



CAMBRIDGE LOCAL PLAN 2014

STATEMENT OF CONSULTATION AND AUDIT TRAILS

**STATEMENT MADE UNDER REGULATION 22 OF THE TOWN
AND COUNTRY PLANNING (LOCAL PLANNING) (ENGLAND)
REGULATIONS 2012**

MARCH 2014

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1 INTRODUCTION

- 1.1 The Local Plan is used to guide decisions on matters ranging from the location of housing, schools, parks and open spaces to the design requirements of new buildings. Policies in the Local Plan are used when decisions on planning applications are made. The current Local Plan for Cambridge was adopted in 2006 and it is now being reviewed.
- 1.2 The timetable below shows the stages that are involved in the preparation of a new Local Plan. Stages 1 to 4 have been completed and we are now at Stage 5: Submission.

Table 1: Timetable for the production of the Cambridge Local Plan 2014

STAGE	DATES
1 - Preparation and completion of evidence base and preparation of the Issues and Options Report	March 2011 – May 2012
2 - Issues and Options consultation	15 June – 27 July 2012
3 - Consultation on site options for development	7 January – 18 February 2013
4 – Consultation on the draft Cambridge Local Plan 2014	19 July - 30 September 2013
5 - Submission	Spring 2014
6 - Examination	Spring/Summer 2014
7 - Adoption	Winter 2014

Purpose of this report

- 1.3 This report sets out the consultation arrangements proposed by the council in the development of the Cambridge Local Plan 2014: Proposed Submission, prepared in accordance with the requirements of The Town and Country Planning (Local Planning) (England) Regulations 2012. The council recognise the importance of engaging the community from the outset of the Local Plan review process. To this end, in November 2011, the council agreed a Consultation and Community Engagement Strategy for the Local Plan review, which can be viewed via the link below:
<http://www.cambridge.gov.uk/democracy/documents/s6576/Cambridge%20Local%20Plan%20Appendix%20A%20Consultation%20and%20Engagement%20Strategy.pdf>
- 1.4 This document also sets out the key issues raised during the various stages of consultation, as well as setting out the justification for the approach being taken forward into the draft Cambridge Local Plan 2014 (see Appendix 3).

Preparation and completion of evidence base

- 1.4 As part of the early stage of developing a new plan, the council has undertaken a significant amount of work in compiling its evidence base. This has involved the completion of a number of studies as well as working with key stakeholders, organisations and groups across the city. Details of the evidence base for the Cambridge Local Plan 2014: Proposed Submission can be found by visiting the background documents page of the council's website:
<http://www.cambridge.gov.uk/ccm/navigation/planning-and-building-control/planning-policy/background-documents/>

- 1.5 A series of workshops were also held between December 2011 and February 2012, with councillors, stakeholders, developers, agents and residents associations. The purpose of these workshops was to explain how the Local Plan will be prepared, to encourage people to get involved from an early stage and to discuss issues and concerns.
- 1.6 Written reports of these workshops and a summary document can be found by visiting www.cambridge.gov.uk/localplanreview
- 1.7 One to one meetings were also offered and a number were held with various organisations in order to help understand future needs and concerns. The issues identified as part of these workshops and one to one meetings, alongside evidence developed as part of background studies, were then incorporated into the development of the Cambridge Local Plan Towards 2031 - Issues and Options Report.

2 CONSULTATION ON THE ISSUES AND OPTIONS REPORT

- 2.1 The Cambridge Local Plan Towards 2031 – Issues and Options Report was made available for a six-week period of public consultation between 15 June and 27 July 2012. This consultation provided an opportunity for local residents and other key stakeholders to have sight of and discuss a range of issues and options that are relevant to the future planning and development of the city.
- 2.2 Consultation on the Issues and Options Report took place between 15 June and 27 July 2012. During this time, people were able to comment on both the Issues and Options Report and its associated Sustainability Appraisal. The planning regulations¹, establish minimum requirements for consultation and at the Issues and Options stage the council is required to consult specific and general consultation bodies, as appropriate to the document. Appendix A includes the list of consultees.
- 2.3 In accordance with the council's Consultation and Community Engagement Strategy, consultation arrangements included:
- Consultation for 6 weeks between 15 June and 27 July 2012;
 - Letters and emails informing consultees of consultation dates and how to view and respond to the consultation material (see Appendix 1 for list of consultees);
 - A public notice (see Appendix 2);
 - All documents made available on the council's website and Customer Service Centre including a small exhibition;
 - Libraries received hard copies;
 - Article in the summer edition of Cambridge Matters which goes to every household in the city;
 - Publicised the consultation through the council's Facebook page and Twitter as well as developing a Local Plan news blog;
 - Leaflets promoting the Local Plan consultation were handed out at key locations including Cambridge Station, Addenbrooke's Hospital and Cambridge Science Park;
 - Opportunities were also explored to engage with young people and other groups.

¹ The Town and Country Planning (Local Planning) (England) Regulations 2012

2.4 A series of exhibitions across the city were also held, to enable as wide an audience as possible to have their say on the Issues and Options Report, as outlined in Table 2 below.

Table 2: Exhibitions held as part of the Issues and Options consultation

Event	Dates	Where
West Cambridge Exhibition	Tuesday 19 June 3pm - 8 pm	West Cambridge Sports Pavilion, Wilberforce Road, CB3 0EQ
North Cambridge Exhibition	Saturday 23 June 10am - 3pm	The Meadows Community Centre
East Cambridge Exhibition	Tuesday 26 June 3pm - 8 pm	Barnwell Baptist Church
South West Cambridge Exhibition	Saturday 30 June 10am - 3pm	Trumpington Village Hall
South East Cambridge Exhibition	Tuesday 3 July 3.30pm - 8 pm	Cherry Hinton Village Centre
Central Cambridge Exhibition	Wednesday 4 July 10am - 8 pm	Small Hall – Guildhall
Central Cambridge Exhibition (Stall with ChYPPS)	Saturday 7 July 10am - 3pm	The Big Weekend
North East Cambridge Exhibition	Tuesday 10 July 3pm - 8 pm	Brown’s Field Community Centre
Central Cambridge Exhibition	Monday 16 July 10am - 8 pm	Small Hall – Guildhall
East Cambridge Exhibition	Saturday 14 July 1pm - 5pm	Ross Street Community Centre

2.5 A public notice was placed in the Cambridge News, setting out the details of the consultation including where consultation documents can be viewed. A copy of this public notice can be found in Appendix 2.

2.6 The council set up an interactive website to assist access to the Issues and Options Report and to facilitate making responses online. Over 11,000 comments were received to the Issues and Options Report and its accompanying Sustainability Appraisal from 858 respondents.

Key Issues

2.7 Appendix 3 contains a summary of the key issues raised during the Issues and Options consultation, alongside the justification for each of the policy approaches being taken forward in the Cambridge Local Plan 2014: Proposed Submission. An approach has been taken whereby representations with similar themes have been grouped together to enable a more effective approach to responding to representations and drafting the Local Plan. The key issues that received the most interest and comment relate to:

- The need for a joint plan with South Cambridgeshire District Council in order to plan for housing an employment provision across the two areas;

- Recognition of housing need but significant concern about the environmental impacts as well as the ability for appropriate infrastructure to be provided;
- Mixed support for further development in the Green Belt. Many respondents made the point that the Green Belt should be protected;
- The majority of the land within the broad locations are considered to be important to the setting and special character of the city;
- Support for the continued redevelopment at the station and the fringe sites developments at the Southern Fringe and North West Cambridge;
- Concern about the capacity in the City Centre, especially in relation to space and the quality of the public realm;
- Support for employment led development at Northern Fringe East although other uses have been suggested;
- General support for the opportunity areas put forward along with suggestions for other opportunity areas such as Mitcham's Corner;
- Support for being ambitious in relation to climate change and water related policies although concern about viability and implementation;
- Support for options relating to design, historic environment, landscape and biodiversity;
- Mixed support for options relating to density, tall buildings, space standards and lifetime homes;
- Support for employment provision although concern about the lack of land for provision;
- Support for local, independent shops and diversity in centres;
- Support for a sub regional community stadium in principle although the majority of those in support live outside the city and are Cambridge United supporters. There was no overall support for a particular site;
- Support for an ice rink in Cambridge;
- Support for continued emphasis on non car modes;
- Support for a review of residential car parking standards to better reflect national guidelines; and
- Support for the option relating to timely provision of infrastructure.

2.8 The Issues and Options Report also set out ten potential broad locations for development at the edge of Cambridge. As these are an important consideration in the development of the sustainable development strategy for the Local Plan, the key issues raised to each of these broad locations are set out in Appendix 5. These comments informed the development of the approach to sites consulted on as part of the Part 1 document of the Issues and Options 2 consultation, which is considered in more detail in Section 3 below.

Sustainability Appraisal

Interim Sustainability Appraisal Report

2.9 It is a requirement of the Planning and Compulsory Purchase Act (2004) for all planning policies documents to undergo a Sustainability Appraisal (SA) in order to determine their impact on social, economic and environmental objectives. The first stage in the process is to determine the scope of the Sustainability Appraisal and to set out the Sustainability Appraisal Framework, which will be used to assess the Local Plan.

2.10 The draft Scoping Report was made available for consultation between February and March 2012, in line with requirements of the Environmental Assessment of Plans and Programmes Regulations, 2004. Consultation was carried out with the SEA Consultation Bodies (the

Environment Agency, Natural England and English Heritage) and other key stakeholders. A number of changes were made to the Scoping Report as a result of this consultation, which provided further detail to the sustainability themes identified in the report. Further detail of these changes is provided in Annex II of the Scoping Report².

- 2.11 The next stage of the SA process was to appraise the options presented in the Issues and Options Report. To this end, the Issues and Options Report was appraised and an Interim Sustainability Appraisal Report produced by consultants URS (May 2012). This document was made available for consultation at the same time as the Issues and Options Report.
- 2.12 A total of 300 representations were received to the SA, of which there were 174 representations in support and 122 objections. Many of these representations echoed comments made to sections of the Issues and Options Report, rather than having a focus on the findings of the SA itself. As the SA was carried out by independent consultants in order to inform the preparation of the new Local Plan, it was felt that no changes should be made to the SA as a result of this consultation. Officers took account of the representations received to the SA when preparing the Draft Local Plan.

3 ISSUES AND OPTIONS 2 CONSULTATION

- 3.1 The next stage of consultation was the Issues and Options 2 consultation, which took place between 7 January and 18 February 2013. The Issues and Options 2 document was split into two parts: the Part 1 document was a joint consultation between Cambridge City Council and South Cambridgeshire District Council on options for the development strategy for the wider Cambridge area and for site options for housing or employment development on the edge of Cambridge on land currently in the Cambridge Green Belt. It also included site options for a community stadium. It built upon the Issues and Options consultations that both councils undertook in Summer 2012 and provided background information in relation to the housing and employment needs for the area as a whole, as well as outlining what that means for the future development strategy. The site options included in Part 1 had regard to the comments submitted in response to the Issues and Options consultations on the ten broad locations in the Green Belt on the edge of Cambridge, a summary of which can be found in Appendix 5.
- 3.2 The Part 2 Site Options Within Cambridge consultation document considered both site allocations and designations. The site allocations focussed on strategic sites that were considered central to the achievement of the development strategy for Cambridge, for example achievement of housing requirements or land for employment development. It also sought people's views on designations that were to be included in the new Local Plan and its accompanying Policies Map. These designations will include areas of protection, such as protected open space, and land-use designations such as local and district centres. In addition, the Part 2 document considered more detailed matters such as consultation on residential space standards and car and cycle parking standards.

² URS (June 2012) Cambridge Local Plan Sustainability Appraisal Scoping Report.

Consultation Arrangements

3.3 In accordance with the planning regulations and the council’s consultation and community engagement strategy, consultation arrangements included:

- Consultation for 6 weeks between 7 January and 18 February 2013;
- Letters and emails informing consultees of consultation dates and how to view and respond to the consultation material, including consultees listed in Appendix 1 and all those who responded to the Issues and Options consultation;
- A public notice was placed in the Cambridge News (see Appendix 4);
- Posters to advertise local exhibitions;
- All documents were made available on the Council’s website and the Customer Service Centre at Mandela House;
- Libraries received hard copies;
- Article in Cambridge Matters, which included dates on exhibitions, including those being held jointly with South Cambridgeshire District Council;
- Use of the council’s Facebook page and Twitter account to publicise consultation;
- Use of the Local Plan blog; and
- Use of site notices for each of the site options, with letters sent to adjacent neighbours to inform them of the consultation.

3.4 A series of exhibitions across Cambridge and South Cambridgeshire were held, some of which were joint exhibitions, as shown in Table 3 below. Exhibitions were advertised in each council’s magazine and were attended by officers of both councils (shaded in the table below).

Table 3: Exhibitions held for the Issues and Options 2 consultation

Date	Venue	Exhibition Time
Monday 7 January	Grantchester – Village Hall	2.30pm – 7.30pm
Tuesday 8 January	Castle Street Methodist Church	2.30pm – 7.30pm
Wednesday 9 January	Fulbourn, The Swifts	2.30pm – 7.30pm
Thursday 10 January	The Hub, Camborne – Main Hall	2.30pm – 7.30pm
Saturday 12 January	Trumpington Village Hall – Jubilee Room	12– 4pm
Monday 14 January	Guildhall – Small Hall	2.30pm – 7.30pm
Wednesday 16 January	Great Shelford – Memorial Hall	2.30pm – 7.30pm
Friday 18 January	Meadows Community Centre, Cambridge – Room 2	2.30pm – 7.30pm
Monday 21 January	Guildhall – Small Hall	2.30pm – 7.30pm
Tuesday 22 January	Histon and Impington Recreation Ground	2.30pm – 7.30pm
Friday 25 January	Cherry Hinton Village Centre – Large Meeting Room	2.30pm – 7.30pm

Saturday 26 January	Netherhall School – Atrium Hall	12 – 4pm
Monday 28 January	Newnham Croft Primary School	5pm – 8.30pm
Friday 1 February	Brown’s Field Community Centre, Cambridge – Hall	2.30pm – 7.30pm
Thursday 14 February	East Area Committee, Cambridge United Football Club – Dublin Suite	5pm – 7pm

3.5 The council’s interactive website was also set up to enable people to view and respond to the Issues and Options 2 consultation online. A total of 6,432 representations were received to the Issues and Options consultation, of which 5,224 were to the Part 1 document, and 1,208 were to the Part 2 document. For those who do not have access to a computer, paper response forms were also made available.

Key issues – Part 1 Document

3.6 One of the key issues that was considered in the Part 1 document, was the appropriate approach to take regarding the development of a sustainable development strategy for the city of Cambridge and the settlements and rural area that surrounds it. As part of the joint consultation, a number of strategic issues were consulted on in the Part 1 document, including:

- The appropriate approach to delivering growth in or close to Cambridge;
- Policy options relating to the Cambridge Green Belt;
- The role of Cambridge East in the new development plan strategies;
- Cambridge Northern Fringe East; and
- Proposals for Community Stadia and other facilities.

3.7 Appendix 5 sets out the detail of the approach that has been taken in reaching the preferred approach for the sustainable development strategy for Cambridge and South Cambridgeshire. It presents the cooperative basis upon which this work has been prepared, the matters that have been taken into consideration in the development of the recommended approach, the representations to consultations carried out at the Issues and Options and Issues and Options 2 stages of relevance to the strategy and the sustainability assessment of the recommended approach.

Key issues – Part 2 document

3.7 The summaries of the key issues raised to the various sections of the Part 2 document and how these have influenced the development of policy can be found as follows:

- Site Allocations (Chapters D – H of the Part 2 document): see Appendices 3 and 6. Appendix 3 sets out the justification for the approach being taken to site allocations being taken forward. Appendix 6 sets out the key issues relating to five sites from Issues and Options 2 consultation which are not being taken forward;
- Residential Space Standards: see Appendix 3 and the audit trail for Policy 50 (Residential Space Standards);
- Car and Cycle Parking Standards: see Appendix 3 and the audit trail for Policy 82 (Parking Management);

- Protected Industrial Sites: see Appendix 3 and the audit trail for Policy 41 (Protection of business space)
- District and Local Centres: see Appendix 3 and the audit trail for Policy 72 (Development and change of use in district, local and neighbourhood centres);
- Protected Open Spaces: see Appendix 3 and the audit trail for Policy 67 (Protection of Open Spaces).

Sustainability Appraisal

- 3.8 Alongside the Issues and Options 2 consultation documents, we also consulted on Sustainability Appraisals (SA) for both the Part 1 and Part 2 documents. For the Part 1 document, a joint SA was prepared, which considered the impact of the site options on the sustainability objectives identified in the SA Scoping Reports of both Councils. The SAs were made available for consultation at the same time as the Issues and Options 2 documents. A total of 28 representations were received to the SA, of which 30 were made to the appraisal of the Part 1 document, and 8 were made to the appraisal of the Part 2 document.
- 3.9 Many of these representations echoed comments made to sections of the Issues and Options Report, rather than having a focus on the findings of the SA itself. There was some comment as to the nature of the site appraisal criteria related to climate change mitigation and renewable energy provision, with a concern that these did not go far enough to deal with the issues of our changing climate. It is considered that the wider coverage of climate change within new local plan policies will help to address these concerns. As the SA was carried out by independent consultants in order to inform the preparation of the new Local Plan, it was felt that no changes should be made to the SA at that time as a result of this consultation.

4 DEVELOPMENT OF THE CAMBRIDGE LOCAL PLAN 2014 PROPOSED SUBMISSION

- 4.1 Following on from the Issues and Options and Issues and Options 2 consultations, the council has prepared the Cambridge Local Plan 2014: Proposed Submission document, which includes a key diagram setting out broad locations for strategic development. Sitting alongside the plan, a Policies Map was also prepared, setting out land-use designations, sites allocated for various types of development and areas of protection, including sites of nature conservation importance, protected open spaces and conservation areas.
- 4.2 In drawing up the Cambridge Local Plan 2014: Proposed Submission, account has been taken of the National Planning Policy Framework, representations to the Issues and Options and Issues and Options 2 consultations, the Sustainability Appraisal, local circumstances and the available evidence base, which includes viability assessments. Considerable joint working has been undertaken between Cambridge City Council, South Cambridgeshire District Council, Cambridgeshire County Council and other Cambridgeshire local planning authorities in developing the draft plan, as outlined in Section 6 below.

5 CONSULTATION ON THE CAMBRIDGE LOCAL PLAN 2014: PROPOSED SUBMISSION

- 5.1 The Cambridge Local Plan 2014: Proposed Submission was subject to a ten-week period of public consultation between 19 July and 30 September 2013. This consultation gave local residents and other key stakeholders the opportunity to have their say on the policies and proposals contained within the plan, prior to its submission to the Secretary of State (see

Section 7 for the next steps). Around 3,000 consultation responses were received, and the key issues are set out in the audit trails contained within Appendix 3.

Consultation Arrangements

5.2 Consultation on the Cambridge Local Plan 2014: Proposed Submission took place between **19 July and 30 September 2013**. During this time, people were able to comment on both the Cambridge Local Plan 2014: Proposed Submission and its associated Sustainability Appraisal.

5.3 In accordance with the council’s Consultation and Community Engagement Strategy, consultation arrangements included:

- Consultation for 6 weeks between 19 July and 30 September 2013;
- Letters and emails informing consultees of consultation dates and how to view and respond to the consultation material (see Appendix 1 for list of consultees);
- Letters and emails informing all those who responded to the Issues and Options and Issues and Options 2 consultations of consultation dates and how to view and respond to the consultation material;
- A public notice (see Appendix 7);
- All documents were made available on the council’s website and Customer Service Centre including a small exhibition;
- Libraries received hard copies;
- Article and “pull out” response sheet included in the summer edition of Cambridge Matters which went to every household in the city;
- Publicising the consultation through the council’s Facebook page and Twitter as well as developing a Local Plan news blog;

5.4 A series of exhibitions across Cambridge and South Cambridgeshire were also undertaken. Some of these were joint exhibitions, which were advertised on each council’s magazine and were attended by officers of both councils (shaded in the table below). Dates and venues are shown in Table 4 below.

Table 4: Exhibitions held for the Cambridge Local Plan 2014: Proposed Submission consultation

VENUE	TIME	DATE
Trumpington Pavilion	14:30-19:30	Monday 22 July
Guildhall – Large Hall	14:30-19:30	Tuesday 23 July
Cambridge United Football Ground - Dublin Suite	14:30-19:30	Wednesday 24 July
Great Shelford Memorial Hall	14:30-19:30	Friday 26 July
Large Meeting Room, Cherry Hinton Village Centre	14:30-19:30	Friday 26 July
Wolfson College – Seminar Room	14:30-19:30	Monday 29 July
Meadows Community Centre	14:30-19:30	Wednesday 31 July
The Hall, Castle Street Methodist Church	14:30-19:30	Tuesday 27 August
The Hall, Queen Emma Primary School, Gunhild Way	14:30-19:30	Wednesday 28 August

VENUE	TIME	DATE
Guildhall – Large Hall	14:30-19:30	Wednesday 4 September
Histon and Impington Recreation Ground	14:30-19:30	Thursday 5 September
Brown’s Field Youth and Community Centre, Green End Road	14:30-19:30	Friday 6 September
Bharat Bhavan, Mill Road (Old Library)	11:00-17:00	Saturday 7 September

A specific event was organised by FeCRA (the Federation of Cambridge Residents Associations), primarily for Resident Associations. This event took place on 13 July 2013 and involved presentations by officers from Cambridge City Council, South Cambridgeshire District Council and Cambridgeshire County Council.

- 5.5 A public notice was placed in the Cambridge News, setting out the details of the consultation including where consultation documents can be viewed. Once people had viewed the Cambridge Local Plan 2014: Proposed Submission, comments on the document could be sent to the council. There were a number of ways in which comments could be made:
- **Using the Council’s online consultation system** – This is the Council’s preferred means of receiving representations because it is the fastest and most accurate method, helping us to manage representations quickly and efficiently. Separate instructions on how to use the online consultation system are provided on the [local plan review website](#), with the online consultation system address being: <http://cambridge.jdi-consult.net/ldf/>;
 - **Using a response form** – For those without access to a computer, a paper form was made available to be completed and sent to the council. Copies of the response form were available from the planning policy team, at exhibitions and from the Customer Service Centre.
- 5.6 Comments were to be submitted before **5.00pm on 30 September 2013**.

Sustainability Appraisal

- 5.7 The Cambridge Local Plan 2014: Proposed Submission was subject to a Sustainability Appraisal (SA). This appraisal assessed the impact of the proposals and policies contained within the plan against a set of environmental, social and economic sustainability criteria. The SA Consultants, URS, carried out the appraisal prior to the draft local plan being made available for public consultation, in order to allow the council the opportunity to amend the draft plan where considered appropriate. Further details of this are outlined in table 5 below and are also included within the audit trail set out in Appendix 3 of this document.

Table 5: Recommendations from the Sustainability Appraisal (SA) of Cambridge Local Plan 2014: Proposed Submission

Sustainability Topic	Policy	Sustainability Appraisal Recommendation	Officer Response	Action
Climate Change Mitigation and renewable energy	Policies in Section Four: Responding to Climate Change and Managing Resources	Work closely with applicants to ensure that design features, mitigation and infrastructure is implemented as fully as possible, given viability constraints.	This is a matter to be addressed through the use of the policy in the consideration of planning applications.	No change proposed.
Economy		Ensure that new employment areas have strong transport links to King's Hedges and Abbey Ward areas so that residents of these income and employment deprived areas can take advantage of new employment opportunities elsewhere in the city. It is notable that no policy is directed specifically at addressing problems of deprivation in these areas, albeit it is recognised that Cambridge is a compact city and hence wherever employment is located it will be relatively easy to access by public transport or bicycle.	Policies in Section 8 seek to ensure that new developments appropriately link to public transport, cycling and walking routes.	No change proposed.
Flood risk Including climate change adaptation		No recommendations made.	N/A	N/A
Landscape, Townscape and Cultural Heritage		No recommendations made.	N/A	N/A
Transport	Policy 81	The policy could be strengthened and	The City Council in	Propose additional wording to

Sustainability Topic	Policy	Sustainability Appraisal Recommendation	Officer Response	Action
	(Mitigating the Transport Impact of Development)	reworded to make it clearer what type of infrastructure the financial contributions would be used for. This policy would better support the transport objectives if these contributions were to be directed towards sustainable transport infrastructure.	collaboration with the County Council is encouraging the use of sustainable modes of transport. Additional text is proposed in the policy.	criterion (c) of Policy 81 so that the second sentence reads: 'This could include investment in infrastructure, services or behavioural change measures to encourage the use of sustainable modes of transport.'
Transport	Policy 56 (Creating Successful Places)	The policy could be reworded to emphasise the need for proposals to be accessible by sustainable modes of transport such as through the inclusion of foot / cycle paths and public transport.	Policy 80 - Supporting sustainable access to development, addresses the need for development to prioritise access by sustainable modes.	No change proposed.
Biodiversity		Encourage additional focus on prioritising brownfield development.	The prioritisation of sites is dealt with in the Spatial Strategy of the Local Plan. The Local Plan needs to avoid repeating the policies in the NPPF, which outlines how Green Belt land should be protected.	No change proposed.
Biodiversity	Policy 8 (Setting of the City)	Increased consideration of the role that new or existing green space can play as part of the wider ecological network of the city, including as green infrastructure (promoting the Cambridgeshire Green Infrastructure Strategy).	Policy 8 already states that development on the urban edge will only be supported where it enhances biodiversity and particular reference is made to supporting proposals for landscape scale enhancement and the conservation or enhancement of biodiversity.	No change proposed.

Sustainability Topic	Policy	Sustainability Appraisal Recommendation	Officer Response	Action
			Other policies in the Plan also seek to enhance biodiversity and linkages in the ecological network (Policies 67, 69 and 70). Also, Policy 7 looks at the enhancement of natural resources and renaturalisation of the River Cam.	
Biodiversity	Policy 35 (Protection of Human Health from Noise and Vibration)	Highlight the need to consider the impacts of noise on wildlife in addition to human health.	Policies 69 and 70 seek to protect both sites of local nature conservation importance and priority species and habitats from the impacts of development, including disturbance.	No change proposed.
Biodiversity	Policy 52 (Protecting Garden Land and the Subdivision of Existing Dwelling Plots)	Encourage consideration of the wildlife value of gardens.	Agree that the policy could be strengthened by referring to the wildlife value of gardens.	Propose change criterion (b) of Policy 52 to read: 'sufficient garden space and space around existing dwellings is retained, especially where these spaces and any trees are worthy of retention due to their contribution to the character of the area and their biodiversity importance.
Biodiversity	Policy 67 (Protection of Open Space)	Ensure that replacement green space is positioned with reference to the City's wider green infrastructure network in order to maximise benefits.	Change suggested to the supporting text to Policy 67.	Propose the inclusion of an additional sentence at the end of paragraph 7.45: 'Where replacement facilities are

Sustainability Topic	Policy	Sustainability Appraisal Recommendation	Officer Response	Action
				provided, consideration should be given to how they link with the wider ecological network and enhance biodiversity.'
Water	Policy 27 (Carbon Reduction, Community Energy Networks, Sustainable Design and Construction and Water Use)	Strengthen the call for increased water efficiency in new development by removing the conditions relating to technical and economic viability.	The flexibility in the policy is required to reflect the fact that each individual planning application will need to be assessed on its own merits.	No change proposed.
Water	Policy 32 (Flood Risk)	Encourage flood risk management in new development to take into account the role SuDS can play in reducing the pollution of watercourses.	An intrinsic benefit of SuDS is their role in reducing pollution of watercourses. Policy 31 seeks to ensure all surface water that is discharged to ground or into rivers, watercourses and sewers has an appropriate level of treatment to reduce the risk of diffuse pollution. Therefore, it is not felt necessary to repeat this in Policy 32.	No change proposed.
Community and Wellbeing	Policy 9 (The City Centre)	Policy could perhaps go further in terms of explicitly requiring that development proposals in the City Centre take into account	Policy 10 which deals with development in the City Centre Primary Shopping Area	No change proposed.

Sustainability Topic	Policy	Sustainability Appraisal Recommendation	Officer Response	Action
		and reflect identified needs associated with the local community.	talks about the use of the upper floors of units for residential, student accommodation, offices and community facilities, which will be of benefit for the local community and potentially increase the residential community in the City Centre.	
Community and Wellbeing	Policy 73 (Community and Leisure Facilities)	Include criteria setting out conditions that would apply should development result in the loss of educational and healthcare facilities.	The 'Loss of facilities' section in Policy 73 is applicable to community facilities which includes educational facilities and healthcare facilities. It also clearly states that the redevelopment of school sites for other uses will be permitted only if it can be demonstrated that they are not required in the longer term for continued educational use. Appendix K explains what information an applicant needs to provide to demonstrate that a community facility (including education facilities and healthcare) is no longer needed. For example, a healthcare facility will need to	No change proposed.

Sustainability Topic	Policy	Sustainability Appraisal Recommendation	Officer Response	Action
			be marketed as a healthcare facility and other community facilities.	
Community and Wellbeing	Policy 29 (Renewable and Low Carbon Energy Generation)	Broaden considerations of the impact of renewable and low-carbon energy generation to include all forms of energy infrastructure.	The focus of this policy is on increasing the proportion of energy generated from renewable and low carbon sources. Other policies in the Plan deal with minimising the impact of development on the environment, for example the policies dealing with design, flood risk, light pollution, protection of human health from noise and vibration and air quality.	No change proposed.
Community and Wellbeing	Policy 83 (Aviation Development)	Make explicit the need to consider the potential health impacts of aviation development at Cambridge Airport.	It is proposed that the policy will be amended to include the following sentence "A health impact assessment will be submitted alongside any planning application to demonstrate that the potential impacts on health have been considered at the planning and design stage."	Propose the policy is amended to include the following sentence: 'A health impact assessment will be submitted alongside any planning application to demonstrate that the potential impacts on health have been considered at the planning and design stage.'
City Centre	Policy 6 (Hierarchy of Centres and Retail Capacity)	The supporting text for Policy 6 could be strengthened to explain how monitoring of retail and leisure capacity will be managed in the period beyond 2022.	At paragraph 2.67, the supporting text to Policy 6 talks about the advice in the Retail and Leisure Study to plan to accommodate retail	Propose additional text to the end of paragraph 2.6, so that it reads: 'This will be subject to monitoring over the plan period, including the monitoring of retail

Sustainability Topic	Policy	Sustainability Appraisal Recommendation	Officer Response	Action
			capacity to 2021 due to the uncertainty in forecasting. The paragraph talks about monitoring, but this could be explained further.	developments in the wider area, which will inform when a review of the Retail and Leisure Study should be carried out.'
City Centre	Section 3	Provide details on how the economic impacts of site allocations that result in the loss of employment space will be identified and addressed.	The economic impacts of site allocations that result in the loss of employment space are considered through the overall assessment of employment land needs versus supply.	No change proposed.
City Centre	Section 3	Make explicit the need to create a safer and improved environment for cyclists in a number of the centre's Opportunity Areas.	Policy 80: Supporting Sustainable Access to Development applies city-wide in respect of sustainable modes of travel such as cycling which needs to be considered alongside any Opportunity Area policies. This requires the prioritisation of cycling in areas to be improved e.g. Opportunity Areas.	No change proposed.
City Centre	Section 3	Call of development proposals in a number of the centre's Opportunity Areas to promote and prioritise the use of sustainable forms of transport.	Policy 80: Supporting Sustainable Access applies city-wide in respect of sustainable modes of transport which needs to be considered alongside any Opportunity Area policies.	No change proposed.

Sustainability Topic	Policy	Sustainability Appraisal Recommendation	Officer Response	Action
			This requires the prioritisation of sustainable modes of travel in respect of proposal sites. Many proposals sites can be found in and around Opportunity Areas.	
City Centre	Policy 27 (Carbon Reduction, Community Energy Networks, Sustainable Design and Construction and Water Use)	Ensure that 'major' development in the Strategic Heating area is defined and that conditions are only relaxed where there is a 'significant' impact on viability.	<p>Major development is defined in the Town and Country Planning (Development Management) (England) Order (2010) as 10 or more dwellings or a site area of 0.5 ha or more where the number of dwellings is unknown, or the provision of a building where the floorspace is 1,000 sq m or more, or where development is carried out on a site having an area of 1 hectare or more. This will be included within the glossary to the Plan.</p> <p>The inclusion of 'significant' does not add anything further to the policy, as each development will be looked at on a case by case basis and it would be difficult to define 'significant'.</p>	Propose inclusion of the definition of 'Major development' in the glossary.
North Cambridge		Ensure that open space infrastructure	Policy 67 and paragraph 7.45	No change proposed.

Sustainability Topic	Policy	Sustainability Appraisal Recommendation	Officer Response	Action
		spending from development in the North Cambridge area goes towards quality improvements in areas of deficiency; particularly Arbury.	make reference to the need to maintain the level of open space provision in the general area surrounding the development. Where it is identified that there is a surplus of provision, Policy 67 requires re-provision of open space to be redirected to areas experiencing deficiencies, such as Arbury.	
North Cambridge	Policy 85 (Infrastructure Delivery, Planning Obligations and the Community Infrastructure Levy)	Prioritise remodelling the High Street in the Chesterton and Ferry Lane Conservation Areas as an infrastructure scheme in Policy 85 in order to reduce heavy traffic and restore the historic character of the areas.	Policy 85 does not set out detailed infrastructure schemes. The update to the Infrastructure Delivery Study will set out a list of schemes, including transport infrastructure, and prioritise these for funding.	No change proposed.
South Cambridge		No recommendations made.	N/A	N/A
East Cambridge		Ensure that transport links and the new multi-modal transport interchange at the rail station allow new employment opportunities surrounding the train station to be accessed by deprived areas in Abbey Ward.	Policy 14 (Northern Fringe East and land surrounding the proposed Cambridge Science Park Station Area of Major Change) ensures that appropriate access and linkages are planned for.	No change proposed.
West Cambridge	Policy 18 (West Cambridge)	Ensure that peripheral employment sites incorporate social spaces.	This is covered by criterion (h) in Policy 13 (Areas of Major Change and Opportunity	No change proposed.

Sustainability Topic	Policy	Sustainability Appraisal Recommendation	Officer Response	Action
	Area of Major Change)		Areas – General Principles) - <i>‘create active and vibrant places which encourage social interaction and meeting, and foster a sense of community’</i> . . This policy relates to all Areas of Major Change including West Cambridge.	
West Cambridge	Policy 18 (West Cambridge Area of Major Change)	Make explicit the need for the provision of publically accessible green space and biodiversity protection in the West Cambridge Area of Major Change.	<p>Green Infrastructure rather than publically accessible green space is an omission in the policy and is made all the more important given the proposed higher density of development. Therefore recommend this is covered through the incorporation of an additional criterion ‘i’ in Policy 18.</p> <p>It is not appropriate to require ‘publically accessible’ as West Cambridge is private, albeit other people are permitted to use it.</p> <p>The supporting text refers to the importance of biodiversity in Para 3.71, and this is reinforced by other policies which cover biodiversity in</p>	Propose add in new criterion (i) to Policy 18 which states: <i>‘proposals provide appropriate green infrastructure which is well integrated with the existing and new development and with the surrounding area.’</i>

Sustainability Topic	Policy	Sustainability Appraisal Recommendation	Officer Response	Action
			<p>the draft Local Plan and which apply to West Cambridge including Policy 8: Setting of the City, Policy 31: Integrated water management and the water cycle, Policy 57: Designing New Buildings, Policy 59: Designing Landscape and the Public Realm. The new criteria (i) also covers biodiversity in the Local Plan definition of green infrastructure.</p>	
West Cambridge	Policy 19 (NIAB 1 Area of Major Change)	Call for a comprehensive transport strategy to be produced alongside development proposals in the NIAB 1 Area of Major Change.	<p>This is an omission for the Policy which should be covered. Whilst current negotiations are quite advanced it is possible that new proposals could be submitted in the future and it would be appropriate to include an additional criterion in Policy 19 with similar wording to Policy 18;</p> <p><i>'it includes a comprehensive transport strategy for the site, incorporating a sustainable transport plan to minimise reliance on the private car.'</i></p>	Propose a new criterion 'h' as follows and then renumber the following criteria in the policy: 'it includes a comprehensive transport strategy for the site, incorporating a sustainable transport plan to minimise reliance on the private car'

Sustainability Topic	Policy	Sustainability Appraisal Recommendation	Officer Response	Action
			<p>The last sentence in Policy 18;</p> <p><i>'This should include assessing the level, form and type of car parking that exists on the site.'</i></p> <p>has been removed because there is no existing car parking.</p>	
West Cambridge	Policy 19 (NIAB 1 Area of Major Change)	Ensure that development proposals in the NIAB 1 Area of Major Change take into account the area's noise pollution and footpath related constraints.	<p>The key constraints of noise pollution and footpaths crossing the site are referred to in Paragraph 3.76 of Policy 19.</p> <p>Noise Pollution is also covered in Policy 35: Protection of Human Health from Noise and Vibration which specifically refers to major sites and noise sensitive development, and refers to the need for noise assessments and noise mitigation measures.</p> <p>The existing footpaths are not covered in other policies and therefore an additional criterion is proposed.</p>	<p>Propose a new criterion as follows between the existing criteria (i) and (j), and then renumber the following criteria in the policy:</p> <p>'where possible retain and enhance existing definitive footpaths that cross the site or provide suitable and safe equivalent links of a similar length as part of the new development'</p>

5.8 The SA was made available for consultation at the same time as the Cambridge Local Plan 2014: Proposed Submission. A total of 9 representations were made to the Sustainability Appraisal and its associated Non-Technical summary, mostly from the promoters of alternative development sites. For the most part, these representations were concerned with the process by which the appraisal had been undertaken, for example that undue weight had been given to the importance of the Green Belt and whether an appraisal of the spatial development strategy had been carried out. Natural England made a representation in general support of the appraisal but queried some of the detailed elements of the report. Again, given that the SA had been carried out by independent consultants, and given that only minor changes have been proposed to the Proposed Submission Plan following consultation, it was not considered necessary to amend the SA Report as a result of any of the representations received. The key issues raised are included in Tables 6 - 13 below.

Table 6: Key Issues raised to Section 1 of the Proposed Submission SA

Section: 1 - Background	
Total Representations: 1	
Object: 1	Support: 0
Objections	<ul style="list-style-type: none"> • A joint Sustainability Appraisal of the Spatial Development Strategy has not been undertaken and as such the consequences of restricting development on the second most sustainable location, after the urban area (development on the urban edge), have not been assessed, considered or consulted upon. • Pigeon Land has submitted a critique of the Sustainability Appraisal of the Submission Draft Local Plan, which concludes: <ul style="list-style-type: none"> ○ The Submission Draft Local Plan is not compliant with the NPPF since it is not delivering the most sustainable development strategy; ○ The Submission Draft Local Plan does not comply with the requirements of Sustainability Appraisal and is not therefore sound; ○ There has been no individual or joint strategic appraisal of two critical options; 'no development on the urban edge of Cambridge' and 'limited development on the edge of Cambridge'; ○ The consequences of restricting development on the second most sustainable location, after the urban area of Cambridge, have not therefore been assessed, considered or consulted upon; ○ The Sustainability Appraisal that has been carried out by Cambridge City Council confirms that the proposed growth strategy does not achieve the strategic objectives that the Council has set itself and will only have a neutral impact on the economy and the community, rather than a positive impact; ○ The Sustainability Appraisal disregards fundamental factors that will result from the proposed strategy, including commuting, pollution and congestion. The SA only considers the level of proposed growth, it does not consider the location of the proposed growth; ○ As such, no measures have been envisaged to prevent, reduce and offset any significant adverse effects of the proposed strategy. The

	<p>identification of such measures is a requirement of the Sustainability Appraisal process;</p> <ul style="list-style-type: none"> ○ Undue weight has been given to the importance of the Green Belt considerations in the Sustainability Appraisal, which has in effect skewed the conclusions. ○ The Cambridge South site (Broad Location 5) has incorrectly been assessed as a housing site. Our re-assessment of the site shows that the Cambridge South site (Broad Location 5) supports the Sustainability Topics and Objectives as much as the proposed Site Options identified in the Submission Draft Local Plan; ○ The Cambridge South site (Broad Location 5) would deliver employment and housing in the second most sustainable location, after the urban area of Cambridge, and would support as many of the sustainability objectives as the proposed Site Options. It should therefore be allocated for development in the Submission Draft Local Plan; ○ The Submission Draft Local Plan is not therefore sound and does not meet Sustainability Appraisal requirements. It should therefore be withdrawn to allow for the full assessment of all spatial growth options.
Support	<ul style="list-style-type: none"> ● Not applicable.

Table 7: Key Issues raised to Section 6 of the Proposed Submission SA

Section: 6 – What’s the Sustainability Context?	
Total Representations: 1	
Object: 1	Support: 0
Objections	<ul style="list-style-type: none"> ● The idea that sustainability policy should support economic growth is fundamentally flawed when that growth is funded by unsustainable debt financing.
Support	Not applicable.

Table 8: Key Issues raised to Section 15 of the Proposed Submission SA

Section: 15 - Methodology	
Total Representations: 2	
Object: 2	Support: 0
Objections	<ul style="list-style-type: none"> ● Pigeon Land has submitted a critique of the Sustainability Appraisal of the Submission Draft Local Plan, which concludes: <ul style="list-style-type: none"> ○ The Submission Draft Local Plan is not compliant with the NPPF since it is not delivering the most sustainable development strategy; ○ The Submission Draft Local Plan does not comply with the requirements of Sustainability Appraisal and is not therefore sound; ○ There has been no individual or joint strategic appraisal of two critical options; 'no development on the urban edge of Cambridge' and 'limited development on the edge of Cambridge';

	<ul style="list-style-type: none"> ○ The consequences of restricting development on the second most sustainable location, after the urban area of Cambridge, have not therefore been assessed, considered or consulted upon; ○ The Sustainability Appraisal that has been carried out by Cambridge City Council confirms that the proposed growth strategy does not achieve the strategic objectives that the Council has set itself and will only have a neutral impact on the economy and the community, rather than a positive impact; ○ The Sustainability Appraisal disregards fundamental factors that will result from the proposed strategy, including commuting, pollution and congestion. The SA only considers the level of proposed growth, it does not consider the location of the proposed growth; ○ As such, no measures have been envisaged to prevent, reduce and offset any significant adverse effects of the proposed strategy. The identification of such measures is a requirement of the Sustainability Appraisal process; ○ Undue weight has been given to the importance of the Green Belt considerations in the Sustainability Appraisal, which has in effect skewed the conclusions. ○ The Cambridge South site (Broad Location 5) has incorrectly been assessed as a housing site. Our re-assessment of the site shows that the Cambridge South site (Broad Location 5) supports the Sustainability Topics and Objectives as much as the proposed Site Options identified in the Submission Draft Local Plan; ○ The Cambridge South site (Broad Location 5) would deliver employment and housing in the second most sustainable location, after the urban area of Cambridge, and would support as many of the sustainability objectives as the proposed Site Options. It should therefore be allocated for development in the Submission Draft Local Plan; ○ The Submission Draft Local Plan is not therefore sound and does not meet Sustainability Appraisal requirements. It should therefore be withdrawn to allow for the full assessment of all spatial growth options. ● Natural England are broadly satisfied with the appraisal and recommendations as regards our remit and in terms of the information provided in the report, however we would like to see more details of the sustainability appraisal framework used in order to be satisfied that the appraisal satisfies the requirements of the SEA directive. This should include greater clarity on the sustainability objectives and indicators as well as details of the policy context and baseline data that have informed the appraisal. Natural England would expect to see the full Sustainability Appraisal provided with the submission version of the Plan to provide a clear audit of how the plan has been appraised in relation to the SA objectives, how alternatives have been assessed and how the Plan will be monitored.
Support	Not applicable.

Table 9: Key Issues raised to Section 19.3 of the Proposed Submission SA

Section: 19.3 - Appraisal	
Total Representations: 1	
Object: 1	Support: 0
Objections	<ul style="list-style-type: none"> The appraisal provides an inadequate analysis of the problems and challenges affecting a historic city under exceptional development pressure.
Support	Not applicable.

Table 10: Key Issues raised to Section 19.4 of the Proposed Submission SA

Section: 19.4 - Appraisal	
Total Representations: 1	
Object: 1	Support: 0
Objections	<ul style="list-style-type: none"> The appraisal provides an inadequate analysis of the problems and challenges affecting a historic city under exceptional development pressure.
Support	Not applicable.

Table 11: Key Issues raised to Section 26.4 of the Proposed Submission SA

Section: 26.4 – Conclusions and Recommendations	
Total Representations: 1	
Object: 1	Support: 0
Objections	<ul style="list-style-type: none"> Elements of the Sustainability Appraisal, including on releasing Green Belt sites for development and meeting sufficient land to meet housing needs, need to be reassessed to meet the requirements of the European Directive 2001/42/EC. Reassessment must consider sites at Cambridge South East.
Support	Not applicable.

Table 12: Key Issues raised to Part 4 of the Proposed Submission SA

Section: Part 4 – What are the next steps (including monitoring)?	
Total Representations: 1	
Object: 1	Support: 0
Objections	<ul style="list-style-type: none"> Natural England has recently commented on the Habitats Regulations Assessment (HRA) accompanying the Cambridge Local Plan; please note that, while we were satisfied with the assessment at the time, it is important that the HRA is kept up to date with any changes in the Plan.
Support	Not applicable.

Table 13: Key Issues raised to the Non Technical Summary of the Proposed Submission SA

Sustainability Appraisal – Non Technical Summary	
Total Representations: 1	
Object: 1	Support: 0
Objections	<ul style="list-style-type: none"> • No evidence is put forward for the assertion that taken together, the policies set out in the Local Plan are likely to result in 'no net loss of biodiversity despite the scale of new development proposed'. The insertion of the word 'likely' makes it clear that this is by no means certain. • It is stated that 'it could lead to positive effects', but again this is simply a possibility with no guarantees that these positive effects will actually occur.
Support	Not applicable.

Appropriate Assessment

- 5.9 In accordance with Article 6(3) of the European Directive 92/43/EEC on the Conservation of Natural Habitats and Wild Fauna and Flora, a Habitats Regulations Assessment is required for all local development documents. This is in order to assess the potential effects of a proposed plan or project both alone and in combination with other plans and projects, on one or more Natura 2000 or Ramsar sites. There are four stages to this process: Screening, Appropriate Assessment, Assessment of Alternative Solutions and Compensatory Measures. If the screening stage concludes that are likely to be no significant impacts on European sites, then there is no requirement to proceed to the stage of Appropriate Assessment.
- 5.10 In order to meet the requirements of Article 6(3), the Cambridge Local Plan 2014: Proposed Submission has been subject to a Screening Assessment. Consultation with Natural England has been carried out.
- 5.11 The Screening Assessment was made available as a supporting document during consultation on the Cambridge Local Plan 2014: Proposed Submission. Appendix 8 contains a letter from Natural England regarding Habitats Regulations Assessment.

6 DUTY TO COOPERATE AND JOINT WORKING ARRANGEMENTS

- 6.1 Planning issues are not constrained to local authority boundaries. The National Planning Policy Framework states that public bodies have a duty to cooperate on planning issues that cross administrative boundaries, particularly those that relate to strategic priorities. Councils are required to work collaboratively to ensure that strategic priorities across local boundaries are properly coordinated and clearly reflected in individual local plans.
- 6.2 The council has a long history of joint working and has worked closely with South Cambridgeshire District Council on a variety of planning matters over many years, reflecting the close functional relationship between the tightly drawn city boundary and its rural surroundings. This includes working together on key strategic and joint issues at both officer and Member level through the preparation of Structure Plans, input to Regional Plans, the preparation of existing development plans, joint Area Action Plans for major developments, the preparation of joint evidence base documents on a wide variety of topics, and other planning matters including various transport strategy documents.

- 6.3 The councils have decided to prepare separate Local Plans for Cambridge and South Cambridgeshire, but are fully aware of the need to work effectively together and that they will need to demonstrate how they have cooperated effectively, both with each other and with other key public bodies, including the County Council, on the preparation of their respective new Local Plans. The councils' ongoing approach to joint working is therefore now a specific legal requirement and it will be necessary to provide formal evidence of the cooperation as part of the plan making process.
- 6.4 Joint working arrangements have already been established. At a Member level, previous joint working groups have been replaced by two new Member groups: The Cambridgeshire and Peterborough Joint Strategic Planning and Transport Member Group, which is a County wide group, and the Joint Strategic Transport and Spatial Planning Group, set up specifically to address issues affecting Cambridge and South Cambridgeshire. Work is also ongoing at an officer level, steered by regular meetings of both senior officers: Chief Planning Officers' group for County wide issues and officers from the three councils for more Cambridge-focused issues. The Cambridgeshire councils have already established and commissioned the Joint Strategic Planning Unit to prepare a Memorandum of Co-operation and the spatial approach for Cambridgeshire and Peterborough, which helps demonstrate the coordinated approach to planning for the long term needs of the wider area. This was agreed by the councils in May 2013, and can be found in Appendix 5 of this Statement of Consultation.
- 6.5 The councils have worked together throughout the preparation of the Issues and Options consultations on the Cambridge Local Plan and South Cambridgeshire Local Plan, and also the parallel consultation on issues for a new Transport Strategy for Cambridge and South Cambridgeshire. The councils took the same approach to joint issues in the summer 2012 Issues and Options consultation. Each of the Issues and Options consultation documents took a common approach to the Green Belt on the edge of Cambridge, the future planning of Cambridge East and the Northern Fringe East and sub-regional sporting, cultural and community facilities. Each document also highlighted the corresponding consultation by the other council. A joint approach has also been taken for the Issues and Options 2 consultation, with the Part 1 consultation document being a joint consultation by the councils.
- 6.6 The councils have agreed to continue to work jointly as plan preparation continues. In terms of timetables, the councils' Local Plan programmes have been very similar, although it did not prove possible to align them completely for the summer 2012 Issues and Options and Proposed Submission consultations.
- 6.7 In terms of working with statutory consultees, as part of evidence base preparation, a series of workshops were held between December 2011 and February 2012 with statutory consultees, as well as with councillors, developers and agents and residents' associations. These allowed for early discussion of the key issues to be dealt with as part of the Local Plan Review. Statutory consultees also responded to the Issues and Options Report and were engaged with as part of the process of drafting of policies prior to consultation on the Cambridge Local Plan 2014: Proposed Submission.
- 6.8 The Duty to Cooperate Report is available as part of the examination library.

7 WHAT HAPPENS NEXT?

- 7.1 Following consultation in Summer 2013 on the Cambridge Local Plan 2014: Proposed Submission and its associated Sustainability Appraisal, the council has prepared the plan for Submission to the Secretary of State for examination in Spring 2014. At this stage, an independent Government Inspector will consider the 'soundness' of the Local Plan at a public examination. In other words, the Inspector will consider whether the plan has been positively prepared, and that its policies are justified, effective and are in conformity with the National Planning Policy Framework. Following this, the Inspector will produce a report of his or her findings, and then the council will look to formally adopt the Local Plan in late 2014.

APPENDIX 1: LIST OF CONSULTEES FOR THE LOCAL PLAN CONSULTATIONS

Below is a list of organisations that will be directly informed of the Local Plan consultations via email (individuals are not listed). In addition to this list, the public were informed through articles in *Cambridge Matters*, various press releases, site notices and posters on noticeboards across the city, through the council's web pages and a series of exhibitions to capture the attention of as many people across the city as possible.

Specific Consultation Bodies³

- Anglian Water
- Barton Parish Council
- British Gas
- Cambridge Crown Court
- Cambridge University Hospital (Addenbrooke's)
- Cambridge Water Company
- Cambridgeshire Constabulary
- Cambridgeshire County Council
- Cambridgeshire Primary Care Trust
- Comberton Parish Council
- Coton Parish Council
- Cottenham Parish Council
- E.On Energy
- East Cambridgeshire District Council
- EDF Energy
- English Heritage
- Environment Agency
- Fen Ditton Parish Council
- Fenland District Council
- Fulbourn Parish Council
- Girton Parish Council
- Grantchester Parish Council
- Great Shelford Parish Council
- Hauxton Parish Council
- Highways Agency
- Histon and Impington Parish Councils
- Homes and Communities Agency
- Horningsea Parish Council
- Huntingdonshire District Council
- Madingley Parish Council
- Milton Parish Council
- N Power
- National Grid Transco Property division
- Natural England
- Network Rail

- Norfolk Suffolk and Cambridgeshire Strategic Health Authority – Abolished 31 March 2013 but NHS Cambridgeshire is on the list, and NHS Property Services and Papworth NHS Trust
- Npower Renewables
- Orchard Park Community Council
- Peterborough City Council
- Scottish and Southern Electric (now called SSE)
- Scottish Power
- South Cambridgeshire District Council
- Teversham Parish Council

Councillors and MPs

- 42 x City Councillors
- All County Councillors (City Wards)
- Julian Huppert MP
- Andrew Lansley MP

Community Organisations

- Age Concern Cambridgeshire
- Arthur Rank Hospice Charity
- Cambridge Citizens Advise Bureau
- Cambridge Ethnic Community Forum
- Cambridge Federation of Residents' Associations
- Cambridge Interfaith Group
- Cambridgeshire Older Peoples Enterprise (COPE)
- Cambridge Council for Voluntary Service
- Disability Cambridgeshire
- East of England Faiths Council
- Encompass Network
- Irish Traveller Movement in Britain
- National Federation of Gypsy Liaison Groups
- The Church of England Ely Diocese
- The COVER Group
- The East Anglian Gypsy Council

³ Specific consultation bodies are required under the Town and Country Planning (Local Planning) (England) Regulations 2012

- The GET Group
- Traveller Solidarity Network
- Work Advice Volunteering Education Training (WAVET)

Environmental

- Cam Valley Forum
- Cambridge Carbon Footprint
- Cambridge Friends of the Earth
- Cambridge Past, Present and Future
- Cambridgeshire Local Access Forum
- Campaign to Protect Rural England
- Conservators of the River Cam
- Countryside Restoration Trust
- Hobson's Conduit Trust
- National Trust
- RSPB Eastern England Office
- The Wildlife Trust
- Transition Cambridge

Developers/Agents

- Artek Design House
- Barratt Eastern Counties
- Barton Wilmore
- Beacon Planning Ltd
- Bellway Homes
- Berkeley Homes
- Bidwells
- Bovis Homes Ltd
- Brookgate
- Capita Symonds
- Carter Jonas
- Chartered Institute of Architectural Technologist
- Cheffins
- Countryside Properties
- DPP
- Drivers Jonas
- Estate Management and Building Service, University of Cambridge
- Gallagher Estates
- Grosvenor USS
- Home Builders Federation
- Icen Homes Ltd
- Januarys
- Liberty Property Trust
- RPS
- Savills

- Skanska UK Plc
- Taylor Vinters
- Taylor Wimpey Developments Ltd
- Terence O'Rourke
- The Home Builders Federation
- The Howard Group of Companies
- The Universities Superannuation Scheme (USS Ltd)
- Unex

Businesses

- ARM Holdings
- Cambridge Cleantech
- Cambridge Energy Forum
- Cambridge Hoteliers Association
- Cambridge Network
- Cambridgeshire Chambers of Commerce
- CRACA
- Creative Front
- Ely Cathedral Business Group
- Encompass Network
- Federation of Small Businesses
- Future Business
- Greater Cambridge Greater Peterborough Local Enterprise Partnership
- Love Cambridge
- Marshalls Group of Companies
- One Nucleus
- Redgate Software
- Royal Mail Group Ltd
- St John's Innovation Centre

Education

- Anglia Ruskin University
- University of Cambridge
- All Colleges of the University of Cambridge
- The Bursars' Committee
- Sixth Form Colleges
- Private Schools
- Cambridge Regional College
- Language Schools
- Secondary Schools in Cambridge

Residents' Associations

- All residents associations in Cambridge
- FeCRA (Federation of Cambridge Residents Associations)

Others

- All who responded to the Issues and Options 1 Consultation
- All who responded to the Issues and Options 2 Consultation
- Argyle Street Housing Cooperative
- BT Open Reach Newsites
- Cable and Wireless UK
- Cambridge Association of Architects
- Cambridge Cycling Campaign
- Cambridge Federation of Tenants and Leaseholders
- Cambridge Local Access Forum
- Cambridgeshire Campaign for Better Transport
- Cambridgeshire Fire and Rescue Service
- Design Council/CABE
- Fenner's Lawn Residents Association Ltd
- Friends of Milton Road Library

- Local Strategic Partnership
- Mobile Operators Association
- Registered Social Landlords
- Shape East
- Sport England
- The Linchpin Project

Additional consultees added or of possible importance/interest

- The Magog Trust
- Cambridge Primary Schools
- The Gypsy Council
- Irish Traveller Movement in Britain – which deals with the Traveller reform project
- Persimmon
- UK Power Networks
- Cambridge Allotment Networks

APPENDIX 2: ISSUES AND OPTIONS CONSULTATION PUBLIC NOTICE

Cambridge City Council Cambridge Local Plan Review



Notice of publication of the Cambridge Local Plan Towards 2031 - Issues and Options Report (June 2012) for public consultation

Cambridge City Council is in the process of preparing a new Local Plan, which will plan for and manage development in the City of Cambridge until 2031. The first stage is the identification of the issues the Council believes are facing Cambridge over the next 20 years and the options for dealing with these issues. The Council seeks your views in order to help shape the new Local Plan.

The six-week consultation period on the Issues and Options Report 2012 and its associated Interim Sustainability Appraisal is from **9am on 15th June 2012 until 5pm on 27th July 2012**

The Issues and Options Report, the Interim Sustainability Appraisal and other relevant supporting documents are available for inspection:

- Online on the City Council's website:
www.cambridge.gov.uk/localplanreview
- At Cambridge City Council's Customer Service Centre at Mandela House, 4 Regent Street, Cambridge, CB2 1BY from 8am-6pm on Mondays, Tuesdays, Wednesdays and Fridays, and 9am-6pm on Thursdays.

You can also visit exhibitions and speak to representatives of the Council as follows:

- West Cambridge Exhibition, Tuesday 19th June 3pm - 8 pm, West Cambridge Sports Pavillion, Wilberforce Road, CB3 0EQ;
- North Cambridge Exhibition, Saturday 23rd June 10am - 3pm, The Meadows Community Centre;
- East Cambridge Exhibition, Tuesday 26th June 3pm - 8 pm, Barnwell Baptist Church;
- South West Cambridge Exhibition, Saturday 30th June 10am - 3pm, Trumpington Village Hall;
- South East Cambridge Exhibition, Tuesday 3rd July 3.30pm - 8 pm, Cherry Hinton Village Centre;
- Central Cambridge Exhibition, Wednesday 4th July 10am - 8 pm, Small Hall, The Guildhall;
- Central Cambridge Exhibition, Saturday 7th July 10am - 3pm The Big Weekend, Parkers Piece (Stall with ChYPPS);
- North East Cambridge Exhibition, Tuesday 10th July 3pm - 8 pm, Brownsfield Community Centre;
- Central Cambridge Exhibition, Monday 16th July 10am - 8 pm, Small Hall, The Guildhall; and
- East Cambridge Exhibition, Saturday 14th July 1pm - 5pm, Ross Street Community Centre

The Issues and Options Report and Sustainability Appraisal can also be purchased from the Customer Service Centre (Tel: 01223 457000).

Comments should be made using:

- The online response system available on the City Council website <http://cambridge.idi-consult.net/ldf/>;
- Printed response forms are available from the Customer Service Centre (as above) or can be downloaded and filled in electronically by visiting www.cambridge.gov.uk/localplanreview

Completed response forms should be sent to:

- Local Plan Review Issues and Options Consultation, Planning Policy Team, Cambridge City Council, PO Box 700, Cambridge, CB1 0JH
- Or emailed to policysurveys@cambridge.gov.uk

Please submit your comments before **5.00pm on the 27th July 2012**.

Any representations submitted in relation to the Issues and Options Report may also be accompanied by a request to be notified of the submission of the draft Local Plan to the Secretary of State.

For further information, please contact the Planning Policy team as follows:

- Tel: 01223 457000
- Email: policysurveys@cambridge.gov.uk

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APPENDIX 3: AUDIT TRAIL OF POLICY DEVELOPMENT (INCLUDING KEY ISSUES ARISING FROM ISSUES AND OPTIONS (2012); ISSUES AND OPTIONS 2 (2013) AND PROPOSED SUBMISSION (2013) CONSULTATIONS)

1. This Appendix sets out in plan order the audit trails for the following:
 - All sections of the plan;
 - All appendices of the plan;
 - Glossary;
 - Policies Map.

2. Where relevant, each audit trail commences at either Issues and Options or Issues and Options 2 consultation. This is dependent on the nature of the policy/area of the plan. Although broad locations were assessed as part of the Issues and Options consultation, specific smaller sites were only consulted on as a part of Issues and Options 2 consultation.

AUDIT TRAIL: SECTION 1: ABOUT CAMBRIDGE

1. Section One: About Cambridge within the Cambridge Local Plan 2014: Proposed Submission document was drawn together for the Proposed Submission consultation. This section does not contain any policies, and therefore has not had an audit trail before this stage of plan-making. However, as representations could be made to this section during the Proposed Submission consultation, key issues arising from consultation and any proposed minor modifications are included below.

Key Issues raised during Proposed Submission consultation

Section One: About Cambridge	
Total Representations: 18	
Object: 11	Support: 7
Objections	<ul style="list-style-type: none"> • Context to 14,000 dwellings is contradictory; • Wording throughout document should prioritise which is more important 'economic success' and 'quality of life and space'; • Total figure of protected open space is contested; • Collaboration required under the NPPF's Duty to Cooperate was ineffectual; • Objected to the safeguarding of Cambridge East; • Draft local plan will not be subject to local determination prior to submission; • Incorrect reference to the county's Minerals and Waste Plan; • Text should be amended to meet the needs of disabled people; • Too much development for non-Cambridge residents; • Scheduled Ancient Monuments and Historic Parks and Gardens on English Heritage's Register should feature on the Policies Map.
Support	<ul style="list-style-type: none"> • Support for the criteria listed to assessment land for protection; • Support for the profile of University of Cambridge and its Colleges; • Support in particular the reference in paragraph 1.9 to the essential part of the character of the city played by spaces and grounds around buildings, and the important role of trees and other landscape features.

Minor Modifications suggested following Proposed Submission consultation and implications for Sustainability Appraisal

2. As a result of a representation (Representation Number 27239) made during the Proposed Submission consultation, a minor modification to paragraph 1.15 is suggested for clarity. This change is in the Addendum to the Cambridge Local Plan 2014: Proposed Submission document marked as PM/1/001 and reads:

“On adoption of this plan, the official statutory development plan for Cambridge comprises:

- Cambridge Local Plan 2014;
- Cambridgeshire and Peterborough Minerals and Waste Local Development Framework Core Strategy (July 2011); and Site Specific Proposals Plan (February 2012) Development Plan Documents;
- Cambridge East Area Action Plan (excluding policies CE/3 and CE/35, which are replaced by Policy 12: Cambridge East); and
- North West Cambridge Area Action Plan.

The Cambridge Local Plan 2006 is deleted in its entirety and no longer forms part of the development plan.”

3. Following consideration of the impact of this change on the Sustainability Appraisal Framework, it has been concluded that this change does not materially alter the findings of the Sustainability Appraisal.

AUDIT TRAIL: SECTION 2: THE SPATIAL STRATEGY

Vision and Objectives

EXISTING POLICY TO BE REPLACED (2006 CAMBRIDGE LOCAL PLAN)	OPTION(S) BEING TAKEN FORWARD FROM THE ISSUES AND OPTIONS REPORT (2012) AND ISSUES AND OPTIONS 2 (2013)	OPTION(S) NOT BEING TAKEN FORWARD FROM THE ISSUES AND OPTIONS REPORT (2012)
<ul style="list-style-type: none"> The Vision for Cambridge; Individual chapter objectives 	<ul style="list-style-type: none"> Option 1 – Cambridge 2031 Vision; Strategic Objectives; Individual chapter strategic priorities 	Not applicable

Key issues raised during Issues and Options (2012) and Issues and Options 2 (2013) consultations:

SECTION OF ISSUES AND OPTIONS REPORT	KEY ISSUES
Option 1: Cambridge 2031 Vision	<ul style="list-style-type: none"> Considerable support for the Vision, even if only part (often most) of it; Needs more mention of existing developments, not just new ones; Needs to remain a compact ‘small town like’ city; Cambridge should become a beacon for urban design and sustainable development; Vision should address socio-economic inequalities; Vision should explicitly mention protection of Green Belt; No mention of diverse natural environment or wildlife in Vision; Vision should reflect having healthy lifestyles as a priority; Needs to better reflect housing needs, anticipated workforce and job growth; Needs to tie into Vision for surrounding districts, particularly South Cambridgeshire; More needs to be made of the exceptional heritage of the city and protecting historic buildings.
Strategic Objectives	<ul style="list-style-type: none"> General support for the strategic objectives; Still too much of a presumption that the Vision should be based on new development; Not enough mention of the Green Belt;

	<ul style="list-style-type: none"> • More commentary on ‘what is sustainable’ – too ambiguous; • Protecting the ‘university town’ and green spaces should have higher priority; • Need to mention noise and light pollution; • Should be additional objective about minimising the need to travel through new communications and technology.
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ISSUE: STRATEGIC PRIORITY – INNOVATIVE AND SUSTAINABLE COMMUNITIES

OPTION NUMBER/OTHER	KEY ISSUES ARISING FROM CONSULTATION
Option 41: Innovative and sustainable communities – This option seeks to deliver truly sustainable communities that balance environmental, social and economic goals and minimise environmental impact	<ul style="list-style-type: none"> • Strong support - Should be fundamental approach to all new development; • Cambridge should lead by example; • Recent unpredictable weather patterns confirm the need for extreme caution. New development should not make the situation (re: flooding) worse. • Welcome the reference to innovative solutions, which may required some flexibility in the way that other policies are interpreted and put into effect.
NEW OPTIONS ARISING FOLLOWING COMMUNITY INVOLVEMENT	
	<ul style="list-style-type: none"> • Make reference to the need for local communities to become more self-sufficient by producing their own energy; • Make reference to the role of sustainable transport, notably cycling, in reducing carbon emissions.

STRATEGIC PRIORITY – DELIVERING HIGH QUALITY PLACES

OPTION NUMBER/OTHER	KEY ISSUES ARISING FROM CONSULTATION
Option 60: Delivering High Quality Places This option is a strategic priority which underpins other more detailed design-related options.	<ul style="list-style-type: none"> • Strong support from most responses – seen as a vital policy; • Need to show the significance of city townscape; • Extra policy needed to require pre-application preparation and consultation on development briefs for all major developments (to be defined by housing number and or square metre development thresholds); • Policy needed to prevent demolition of buildings until development starts;

	<ul style="list-style-type: none"> • Site phasing policy needed so development starts with infrastructure and similar percentage of affordable housing at each stage; • Hard to define high quality design; • Developers need to respect the current ‘style of the city’ and not impact upon this with design that is not akin to it.
NEW OPTIONS ARISING FOLLOWING COMMUNITY INVOLVEMENT	
No additional options have been suggested	

STRATEGIC PRIORITY: PROTECTING AND ENHANCING THE HISTORIC AND NATURAL ENVIRONMENT

OPTION NUMBER	KEY ISSUES ARISING FROM CONSULTATION
Option 67: Protecting and enhancing the historic and natural environment (Strategic priority)	<ul style="list-style-type: none"> • The city should have a heritage policy and a discrete environment policy; • Reference should be made to minimising light pollution; • Hazards to heritage assets should be clearly defined so that aims become meaningful; • Concerns at the loss of green spaces and the need for more trees; • English Heritage has commented that the strategic priority needs to be stronger and suggested some wording changes; • Seeks specific inclusion of college playing fields as part of Cambridge’s distinctive historic environment; • Victorian/Edwardian suburbs such as North Newtown should be given special consideration and mention in the Local Plan and their heritage assets protected; • Support the clear distinction between the historic setting of Cambridge and rural area beyond and suggest it is a good reason to retain the Green Belt.
NEW OPTIONS ARISING FOLLOWING COMMUNITY INVOLVEMENT	
No additional options have been suggested.	

STRATEGIC PRIORITY: BUILDING A STRONG AND COMPETITIVE ECONOMY

OPTION NUMBER	KEY ISSUES ARISING FROM CONSULTATION
Option 121: Building a strong and competitive economy	<ul style="list-style-type: none"> • Essential that the Council continues to support the University of Cambridge which supports Cambridge’s economy, social and cultural life and environment; • Sustainable development for homes and jobs close to Cambridge will help build a strong and competitive economy; • Should plan for growth outside Cambridge, close enough to benefit from links to the University;

	<ul style="list-style-type: none"> • Need for growth should not be assumed at this stage; • The report downplays Anglia Ruskin University's role; • Cambridge's economy too skewed towards public sector; • The number of people and jobs need to be balanced; • Emphasis on strong sectors will exacerbate city's imbalance; • Encourage affordable employment space; • Limited land means much employment growth will have to go in surrounding districts; • Need to support economy of Cambridge sub-region; • Good transport links between employment sites important.
NEW OPTIONS ARISING FOLLOWING COMMUNITY INVOLVEMENT	
Most representations did not propose new options but instead sought to change the proposed option, nevertheless some representations wanted to replace the option with an alternative option that did not seek to grow the economy.	

STRATEGIC PRIORITY: PROMOTING SUCCESSFUL COMMUNITIES

OPTION NUMBER	KEY ISSUES ARISING FROM CONSULTATION
Option 163: A green and pleasant city with vibrant and culturally diverse neighbourhoods	<ul style="list-style-type: none"> • Support for this option however <ul style="list-style-type: none"> ○ Neighbourhoods should also be relaxing; ○ Green spaces should be multi-functional and support the objectives of the Cambridgeshire Green Infrastructure Strategy; • The areas should include proper management of the natural environment and 'wildlife corridors'; • Community facilities should be protected and enhanced but not preclude the possibility of change of use, multi use or relocation based upon a strategic assessment in Cambridge. The policy itself should be sufficiently flexible to meet changing circumstances. • Make protection and enhancement (including better management) a priority; • Support the ongoing protection of open spaces; • Support the maintenance of a green network of open space linking areas of Cambridge together along the Cam; • No intrusive developments along the Cam; • Relationship between the city and its open spaces is a defining aspect of Cambridge; • Recognise important transport function of paths alongside the Cam; • Support for Local Green Space designations and the need for guidance on green areas; • Risk of existing areas becoming overused if new provision is not made available;

	<ul style="list-style-type: none"> • Provide new spaces and not allow developers to pay contributions; • Allotments are essential and should be provided for along with design requirements.
NEW OPTIONS ARISING FOLLOWING COMMUNITY INVOLVEMENT	
No additional options have been suggested.	

STRATEGIC PRIORITY: TIMELY PROVISION OF INFRASTRUCTURE

OPTION NUMBER	KEY ISSUES ARISING FROM CONSULTATION
Option 182: Timely provision of infrastructure	<ul style="list-style-type: none"> • Lots of support for the principle of the policy – getting infrastructure into development early is key; • Feeling that the policy hasn't always been successful / implemented strongly enough in the past and caused congestion issues.
NEW OPTIONS ARISING FOLLOWING COMMUNITY INVOLVEMENT	
No additional options have been suggested.	

Evidence base:

- Cambridge City Council (2006). Cambridge Local Plan 2006
- Cambridge City Council (2012). Cambridge Local Plan Towards 2031 – Issues and Options Report;
- See also evidence base for individual sections

How the vision and strategic objectives came about:

1. Setting a vision and strategic objectives for Cambridge involves considering what Cambridge could be like in 2031, outlining what needs to be achieved and how the Local Plan will help bring it to fruition. The vision and strategic objectives need to reflect the council's priorities and be specific to Cambridge, providing a spatial perspective that gives the Local Plan purpose and direction. The strategic objectives elaborate upon the vision and represent broad intentions of purpose that the more detailed policies and proposals within the Local Plan will strive to deliver. It is crucial that the strategic objectives relate to and are capable of addressing local, national and regional issues and drivers, so as to ensure that the vision is deliverable. In line with the requirements of the National Planning Policy Framework, the Local Plan's strategic objectives are positively worded in order to promote the sustainable growth of the city.

Vision

2. The vision sets out high level aspirations for the city. The current vision in the Cambridge Local Plan 2006 has served the city well, but it requires updating to reflect the changing needs and aspirations of the city. The interim Sustainability Appraisal states that this vision should result in significant positive effects across the majority of sustainability topics. The strong support

for an environmentally sustainable and successful economy, which builds on the city's strengths in the fields of higher education and research and the knowledge based economy should help address the key economic issue to maintain and capitalise on Cambridge's position as one of the UK's most competitive cities. The vision to become a low carbon city and recognition of the need to deliver a city where sustainable transport choices are the norm will also contribute significantly to improving the local environment and making Cambridge a destination of choice to live, work and visit. This should ensure the protection and enhancement of the historic environment and promote the character and distinctiveness of the conservation areas, which are two key landscape, townscape and cultural heritage sustainability issues. The option will thus contribute to maintaining the attractiveness of Cambridge as a tourist destination. This vision should help address identified sustainability issues relating to deprivation and inequality across the whole of the city. Its focus on socially mixed and inclusive communities also recognises the value that the city's ethnic diversity contributes to the city's vibrancy and cosmopolitan feel. The extent to which this vision fully addresses water scarcity in the region is unclear, particularly given the anticipated significant growth in housing and employment provision. Furthermore, the extent to which the vision recognises the threat posed by climate change and the need to both mitigate and adapt to its effects could be more clearly stated.

3. Whilst the level of support from the Issues and Options consultation for parts of the vision has been noted, the vision also needs to reflect policies being taken forward. In relation to the wide-ranging representations made about the vision as a part of Issues and Option consultation (2012), changes to the vision have incorporated reference to the Cambridge Green Belt, the city's exceptional heritage and the protection of historic buildings, and high quality sustainable transport infrastructure. In terms of reflecting housing need and jobs growth, the council has addressed objectively assessed need for the growth of the city in respect of both issues. Section 2 within the Local Plan sets out policies addressing both of these needs, but the vision also recognises the need for the city to continue to develop economically and to provide for the delivery of housing within balanced and mixed communities.
4. The wording of the vision now makes reference to the retention of a high quality of life and place and the need to deliver housing to create and maintain balanced and mixed communities, which will help address social inequalities. The council will introduce a number of policies on sustainability and water efficiency, which could be at the forefront in planning policy nationally. In terms of problems faced such as energy supply, climate change, traffic congestion and food security, the vision is positively worded and mentions the need to have a more environmentally sustainable and successful low carbon economy, a city of high environmental quality and a city where green corridors and open spaces are protected and enhanced and new green spaces are established. The terms 'open spaces' and 'green corridors' within the vision do not exclude the need to provide for a diverse natural environment or for

wildlife. Furthermore, a range of policies are proposed to protect and enhance the natural environment, including specific policy protection of nature conservation sites. In relation to making more references to existing development as well as new development, the Local Plan considers the relationship of new development with existing development.

5. As a part of the Issues and Options consultation, the Joint Vision for Cambridge's Quarter to Six Quadrant was submitted by the parish councils of Barton, Coton and Madingley. The vision for the Local Plan is expressed as the vision for the whole city.

Strategic Objectives

6. The strategic objectives represents high level objectives for development within the city and bridge the gap between the vision and the policies in the Local Plan. The interim sustainability appraisal recognises that the Local Plan seeks to guide development in Cambridge in a sustainable way, balancing social, economic and environmental issues and trying to maximise benefits where possible and minimise any adverse impacts. All strategic objectives were considered to contribute to the overall vision towards 2031, which was subject to sustainability appraisal as Option 1 of the Issues and Options Report.

Strategic Objective 1

7. Strategic Objective 1 relates to the vision of Cambridge as an environmentally sustainable city. In responding to the concerns raised in Issues and Options consultation (2012), the council agrees that the use of urban form and new development to reinforce sustainable transport usage is vital. In order to support this, the council has produced a number of policies on sustainable transport, urban design and sustainable development, which contribute to the ongoing sustainable development of the city. It is considered that the suggested alternative objective makes valid points that are suited to inclusion within more detailed policies.
8. The council notes that from 2016 all new homes will be required to be zero carbon, with non-residential development needing to be zero carbon from 2019 onwards. In terms of future growth of the city being limited, the council needs to address objectively assessed need for the growth of the city, whilst addressing the challenges posed by climate change. New development also presents opportunities for greater deployment of renewable and low carbon energy, water efficiency and other sustainability measures to help the city make a transition to a low carbon future.
9. The council recognises that retrofitting development to deal with climate change is a key area for development and is seeking to introduce policy on retrofitting existing homes as well as guidance on climate change and the historic environment. It should be noted, however, that the Local Plan's remit

in this area is limited to dealing with planning issues. Other departments within the council also have a role to play, for example, in helping to implement the Green Deal.

10. In the Issues and Options consultation, the council also asked how people defined 'sustainable development' in Question 1.1. For Cambridge, sustainable means supporting and enhancing an efficient, compact city form that is attractive, highly accessible and meets its needs now and in future: a city where the quality of life and place has underpinned economic success. Development means managing new growth in a positive, caring way so needs are met creatively and innovatively and they also enhance economic success, quality of life and place and contribute to the well-being of the many diverse communities in Cambridge.

Strategic Objective 2

11. The strategic objective represents a high level objective for water related implications of development within the city. Water neutrality involves not only measures to reduce water consumption in new build, but also retrofitting water efficiency measures in the existing built environment. While such an option offers the most innovative and progressive approach to water efficiency, it may prove difficult to implement and would also be the most expensive option, which may impact on viability. There would also be inherent difficulties in applying retrofit measures to existing properties, with associated ongoing maintenance costs. As such, this option has been rejected. It should, however, be noted that the draft Water Bill, which was published in July 2012, is giving consideration to charging mechanisms and connection charges that may enable water neutrality to be implemented in the future without the need for a specific planning policy.
12. Whilst it is recognised that there may be additional energy usage associated with technologies such as grey water recycling being used to deliver improved water management, it is considered that, given the considerable water stress experienced in this region, the Local Plan must be ambitious in addressing water usage. Representing an improvement on the existing situation, a second option was put forward for all new development to be designed to achieve a maximum water consumption of 80 litres per head per day, which is in line with Levels 5 and 6 of the Code for Sustainable Homes. This would offer higher water efficiency than is being delivered elsewhere in Cambridge, apart from the North West Cambridge development. In terms of the impact of setting requirements for water efficiency on the viability of development, this is being tested through the Council's emerging viability work.
13. Although the need to consider flood risk management on a regional basis is recognised, the Local Plan can only address the management of flooding in Cambridge. The council will continue to work with neighbouring authorities and the Environment Agency to address flood risk across a wider area and to

mitigate the impacts of new development by addressing surface water management in an innovative manner.

14. The council recognises that new development should only be permitted if water supplies are sufficient to meet the additional demand. As such, the council is proposing the introduction of policies within the Local Plan to require high levels of water efficiency in new developments. This approach has been supported by the water companies.

Strategic Objective 3

15. The strategic objective represents a high level objective for the design of development within the city. In relation to concerns raised by respondents to the Issues and Options consultation (2012) regarding the need to be consistent in the development of high quality buildings across the city and a strong focus on energy efficiency, it is considered that these matters are given detailed coverage in policies on the delivery of high quality places and sustainability and climate change. However, the need to recognise the impact of sustainable design and construction on the design and of development has been included in the objective. The implementation of the objective and supporting policies is not something which can be addressed through the strategic objective itself.

Strategic Objective 4

16. The strategic objective represents a high level objective for the positive management of Cambridge's historic environment. Whilst this objective was generally supported through the Issues and Options consultation (2012), respondents raised the need to address conservation areas and buildings of local interest. The objective has been amended to make reference to the River Cam corridor, the city's wider setting and its designated and undesignated heritage assets (a term which covers many aspects of the historic environment).

Strategic Objective 5

17. The strategic objective represents a high level objective for the positive management of Cambridge's skyline. The objective was generally supported through the Issues and Options consultation (2012), although respondents expressed concerns about existing tall buildings. No significant changes have been made to the objective as a result of feedback from consultation.

Strategic Objective 6

18. The strategic objective represents a high level objective for the positive management of Cambridge's landscape setting and open spaces. Respondents to the Issues and Options consultation (2012) supported this objective strongly, but raised concerns about the need for further reference to tree

cover and improvements to green corridors. Accordingly, the objective has been amended to refer to the Cambridge Green Belt, green corridors, green spaces and tree canopy cover.

Strategic Objective 7

19. The strategic objective represents a high level objective for the positive management of Cambridge's biodiversity and geodiversity. In response to concerns raised during the Issues and Options consultation (2012), the objective has been amended to make refer to biodiversity, the network of habitats and geodiversity. The reference to open spaces in the draft objective has been placed in Strategic Objective 6.

Strategic Objective 8

20. The strategic objective represents a high level objective on the provision of housing and merges draft objectives 8 and 9 together. In response to concerns raised during the Issues and Options consultation, the strategic objective has been reworded to reflect the need to deliver a mix of housing types and sizes. It is not the role of the Local Plan to determine who is resident in those dwellings and whether commuters inhabit new housing.

Strategic Objective 9

21. The strategic objective represents a high level objective for development within the city. The need to maintain distinct villages outside Cambridge is recognised in the purposes of the Cambridge Green Belt. The development of the wider area, including a range of broad locations on the edge of Cambridge, has been assessed jointly with South Cambridgeshire District Council, with consideration given to the purposes of the Green Belt. This objective was generally supported and has seen no significant changes since the Issues and Options consultation.

Strategic Objective 10

22. The strategic objective represents a high level objective for economic development within the city. The need for further economic growth of the city has been subject to assessment in producing the city's objectively assessed need for homes and jobs. This objective addresses the concerns raised by respondents and merges the draft objective 11 and 12 to deal with economic growth and the need to support knowledge-based industries.

Strategic Objective 11

23. The strategic objective represents a high level objective for retail development within the city. In relation to the inclusion of references to the protection of community shops outside the City Centre and Mill Road, it is considered that

these matters are given consideration in policies on retail provision and opportunity areas within the Local Plan.

Strategic Objective 12

24. The strategic objective represents a high level objective for community and leisure facilities development within the city. In relation to the inclusion of references to health facilities and pollution issues, it is considered that these matters are given detailed coverage in policies on the delivery of community facilities and pollution in Sections 8 and 4 of the Local Plan respectively.

Strategic Objective 13

25. The strategic objective represents a high level objective for development within the city and merges draft objectives 15 and 16. In relation to the need for public transport to be at the top of the hierarchy, walking and cycling is considered by national guidance to be situated at the top of the user hierarchy, with public transport as the next most sustainable transport mode. The council recognises that some people may not be able to walk or cycle and therefore supports improvements to public and community transport schemes. The council also supports reducing access to the city by car, by encouraging use of sustainable modes of transport. It is considered that these matters are given detailed coverage in policies on transport within the Local Plan and will also be addressed by Cambridgeshire County Council's Transport Strategy for Cambridge and South Cambridgeshire. In relation to the need to include reference to shuttle buses and single ticketing systems, it is not considered that these matters can be given coverage in policies that support the delivery of high quality transport as they would not fall within the remit of the Local Plan to deliver. Whilst recognising the value of single ticketing systems, this would be a matter for Cambridgeshire County Council and the relevant transport operators, but is one that the Local Plan could encourage as part of a high quality public transport network.

Strategic Objective 14

26. The strategic objective represents a high level objective for development within the city. Broadband infrastructure is addressed through the detailed infrastructure policies. The suggested alternative objective makes points that may be suited to inclusion within more detailed policies. It should be noted, however, that the alternative objective is very strongly and negatively worded and may prevent development from coming forward. In line with the requirements of the National Planning Policy Framework, the Local Plan's strategic objectives are positively worded in order to promote the sustainable growth of the city. The draft objective has not been subject to significant amendment.

Strategic Objective 15

27. The strategic objective represents a high level objective for development within the city. In relation to concerns raised by respondents in response to the Issues and Options consultation (2012) regarding the need to include reference to the social environment and pollution issues, it is considered that these matters are given detailed coverage in policies on the delivery of high quality places and pollution. It is not considered that the strategic objective, as currently drafted, explicitly excludes these matters. The draft objective has not been subject to significant amendment.

Key Issues raised during Proposed Submission consultation

The Vision for Cambridge	
Total Representations: 21	
Object: 15	Support: 6
Objections	<ul style="list-style-type: none"> • The vision of a compact sustainable city is contradictory and is not supported by overdevelopment, urban sprawl and erosion of the Green Belt and open spaces; • Vision should make reference to the river corridor through the city; • The plan is pitched too low and lacks ambition for long term needs, particularly transport; • Cambridge has already been overdeveloped and has lost much of its character; • Objection on the retention of Cambridge East as safeguarded land; • Concern about need for enforcement of policies; • Further objections to GB1 Land north of Worts' Causeway and GB2 Land south of Worts' Causeway being allocated, with reference to inaccurate forecasting evidence base and release of Green Belt being in conflict with sustainability goals; • At paragraph 2.3, please add "a mixed community includes disabled people of all ages."
Support	<ul style="list-style-type: none"> • Vision is supported by the University of Cambridge in relation to its aims for higher education, research and the knowledge-based economy; • The Environment Agency supports the vision through its recognition of protecting and enhancing the environmental quality of the city in a sustainable way; • General support; • Support for the vision of a compact city within the Green Belt.

Strategic Objectives	
Total Representations: 30	
Object: 20	Support: 10
Objections	<p>General:</p> <ul style="list-style-type: none"> • The strategic objectives are aspirational but not well supported by the plan itself; • The plan needs to be based on sound evidence, public consent and good delivery; • Objectives 1, 6 and 7 should be prioritised over the other objectives; • Add a strategic objective or policy that means decisions on planning applications cannot be used as precedents in the consideration of future planning applications; <p>Strategic Objective 1:</p> <ul style="list-style-type: none"> • This objective should be applied to site GB1 Land north of Worts' Causeway and GB2 Land south of Worts' Causeway; <p>Strategic Objective 2:</p> <ul style="list-style-type: none"> • No specific representations on this objective; <p>Strategic Objective 3:</p> <ul style="list-style-type: none"> • Amend this strategic objective to read: "embracing the principles of sustainable design and construction and Lifetime Homes"; • New and improved infrastructure proposals emanating from the Transport Strategy for Cambridgeshire as they affect the city will be implemented strictly in compliance with the spirit and intent of Strategic Objectives 3, 4 and 7; • Enforcement of this is needed to ensure quality development takes place; <p>Strategic Objective 4:</p> <ul style="list-style-type: none"> • The plan is at odd with this objective due to the proposals to allocate Green Belt land for development; • New and improved infrastructure proposals emanating from the Transport Strategy for Cambridgeshire as they affect the city will be implemented strictly in compliance with the spirit and intent of Strategic Objectives 3, 4 and 7; <p>Strategic Objective 5:</p> <ul style="list-style-type: none"> • No specific representations on this objective; <p>Strategic Objective 6:</p> <ul style="list-style-type: none"> • Building on the Green Belt does not achieve Strategic Objective 6; • Importance of Strategic Objective 6 cannot be emphasised enough;

Strategic Objective 7:

- Natural England welcome the overall Strategic Objective 7 that requires all new development to protect and enhance the city's geodiversity but suggest that in line the with NPPF, the protection of geological conservation impacts should be included as a criteria based policy. Therefore, without a criteria based policy relating to geodiversity, Natural England considers the plan unsound due to inconsistency with national policy;
- Building on the Green Belt does not achieve Strategic Objective 7 due to the impact on red list species and strategically important wildlife habitats if sites GB1 and GB2 are developed;
- New and improved infrastructure proposals emanating from the Transport Strategy for Cambridgeshire as they affect the city will be implemented strictly in compliance with the spirit and intent of Strategic Objectives 3, 4 and 7;

Strategic Objective 8:

- Amend this strategic objective to read: "meet the housing needs of the city within its sub-region, delivering an appropriate mix of housing types, sizes and tenures to meet existing and future needs, including affordable housing, Lifetime Homes and specialist disability housing";
- Strategic Objective 8 should be reworded all not all developments in Cambridge are housing developments;
- North of Barton Road Landowners Group objected on the basis that the development strategy of the plan will not allow this strategic objective on housing to be delivered;
- Objective 8 outlines the requirement to meet the housing needs of the city "within its sub-region." It is considered that the implications of this could be referred to more explicitly;

Strategic Objective 9:

- No specific representations on this objective;

Strategic Objective 10:

- North of Barton Road Landowners Group objected on the basis that the development strategy of the plan will not allow this strategic objective on economic growth to be delivered;

Strategic Objective 11:

- Strategic objective 11 is supported, but concern is raised about the impact of development at the Fitzroy/Burleigh Street/Grafton Area impacting on the vibrancy of the historic core;

Strategic Objective 12:

- Development on the Green Belt conflicts with this objective;

	<p>Strategic Objective 13</p> <ul style="list-style-type: none"> • No specific representations on this objective; <p>Strategic Objective 14:</p> <ul style="list-style-type: none"> • No specific representations on this objective; <p>Strategic Objective 15:</p> <ul style="list-style-type: none"> • Additional strategic objective to read: No. 16. To create an environment where disabled people have full access to housing, work, education, leisure facilities, transport, services, the public realm and private facilities.
Support	<p>General:</p> <ul style="list-style-type: none"> • General support; <p>Strategic Objective 1:</p> <ul style="list-style-type: none"> • The Environment Agency support this objective and would wish to ensure that they are addressed in the policies which follow; <p>Strategic Objective 2:</p> <ul style="list-style-type: none"> • The Environment Agency support this objective and would wish to ensure that they are addressed in the policies which follow; <p>Strategic Objective 3:</p> <ul style="list-style-type: none"> • English Heritage support this objective; • The Environment Agency support this objective and would wish to ensure that they are addressed in the policies which follow; <p>Strategic Objective 4:</p> <ul style="list-style-type: none"> • English Heritage support this objective, particularly the reference to the positive management of change in the historic environment reflecting the NPPF; • The Environment Agency support this objective and would wish to ensure that they are addressed in the policies which follow; <p>Strategic Objective 5:</p> <ul style="list-style-type: none"> • English Heritage support this objective; <p>Strategic Objective 6:</p> <ul style="list-style-type: none"> • General support; • Importance of Strategic Objective 6 cannot be emphasised enough; • English Heritage support this objective; <p>Strategic Objective 7:</p> <ul style="list-style-type: none"> • The Environment Agency support this objective and would wish to

	<p>ensure that they are addressed in the policies which follow;</p> <p>Strategic Objective 8:</p> <ul style="list-style-type: none"> • No specific representations on this objective; <p>Strategic Objective 9:</p> <ul style="list-style-type: none"> • The Environment Agency support this objective and would wish to ensure that they are addressed in the policies which follow; <p>Strategic Objective 10:</p> <ul style="list-style-type: none"> • The Environment Agency support this objective and would wish to ensure that they are addressed in the policies which follow; <p>Strategic Objective 11:</p> <ul style="list-style-type: none"> • No specific representations on this objective; <p>Strategic Objective 12:</p> <ul style="list-style-type: none"> • The Environment Agency support this objective and would wish to ensure that they are addressed in the policies which follow; <p>Strategic Objective 13:</p> <ul style="list-style-type: none"> • Supported by Cambridgeshire County Council and the Cambridge Cycling Campaign; <p>Strategic Objective 14:</p> <ul style="list-style-type: none"> • The Environment Agency support this objective and would wish to ensure that they are addressed in the policies which follow; <p>Strategic Objective 15:</p> <ul style="list-style-type: none"> • The Environment Agency supports this objective and would wish to ensure that they are addressed in the policies which follow.
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Figure 2.1: Key Diagram

Total Representations: 3

Object: 2

Support: 1

Objections

- The policies map and key diagram should map ecological networks based on the strategic green infrastructure schemes identified through the Cambridgeshire Green Infrastructure Strategy 2011, the Cambridge Nature Conservation Strategy or the South Cambridgeshire Biodiversity Strategy;
- In paragraph 2.9, add lifetime house and specialist disability housing;
- In paragraph 2.17, add: "A city study showed that one third of these households with a disabled person live in unsuitable housing and another 20% need alterations to remain in their homes."

	<ul style="list-style-type: none"> • In paragraph 2.18, add: “In all accommodation provision whether housing, student accommodation and hotel rooms there is an under provision of specialist facilities for disabled people.”
Support	<ul style="list-style-type: none"> • Support, particularly for the retention of land in the Green Belt to the west of the city.

The Spatial Strategy for Cambridge to 2031	
Total Representations: 13	
Object: 12	Support: 1
Objections	<ul style="list-style-type: none"> • The Environment Agency supports the approach taken to the spatial strategy for the location of employment and residential development. Support the application of the sequential approach to the allocation of sites for development; • Cambridgeshire County Council objects on the basis that there is inadequate provision for appropriate education provision, notably for the secondary school sector; • Cambridgeshire County Council notes that the transport strategy will be instrumental in supporting development in Cambridge and South Cambridgeshire; • Pigeon Land objects to the Memorandum of Cooperation and the plan on the basis that housing is exported from the areas which need it and the following changes should be made: <ul style="list-style-type: none"> ○ The 2,000 'over-supply' of dwellings in the Memorandum for East Cambridgeshire, when compared to the level proposed in the East Cambridgeshire Submission Draft Local Plan, should be re-distributed to Cambridge and South Cambridgeshire; ○ The 2,500 dwelling requirement, which it is claimed has already been accommodated in Peterborough, should be re-distributed to Cambridge and South Cambridgeshire. • North of Barton Road Landowners Group state that the development strategy is flawed and request that it is amended to identify additional land on the edge of Cambridge to meet objectively assessed housing needs. A comprehensive review of the Green Belt boundary should be undertaken, based on meeting those development needs. Land to the North of Barton Road should be identified as a strategic site allocation; • The criteria for objectively assessing need should be set out in the plan; • Objection to development of Green Belt land; • The plan is contradictory in developing the Green Belt sites, whilst looking to maintain a compact city; • The city's plan for retail growth is ambitious and perhaps not aligned with an increasingly evident fundamental shift in demand for retail floorspace in recent years. The focus for retailers is quality - this is something which traditional retail capacity models

	<p>fail to take into account;</p> <ul style="list-style-type: none"> • In Table 2.1, amend reference from student hostels to student rooms; • Add the following text to the supporting text for Table 2.1: "The identified requirement for 3,016 additional student rooms accounts for an assumed rate of windfall development based upon historic rates and also the development of student rooms that will be delivered by the North West Cambridge Area Action Plan". • Paragraph 2.19's constraints should not restrict the development of Cambridge and prevent it from meeting in full its objectively assessed needs for employment and housing; • Objection to the sustainable development strategy outlined in the paragraph 2.34, particularly on the basis for the need to improve the transport strategy.
Support	<ul style="list-style-type: none"> • South Cambridgeshire District Council supports the spatial strategy, which complements the strategy in the South Cambridgeshire Proposed Submission Local Plan and provides an appropriate strategy for the wider Cambridge area to 2031; • South Cambridgeshire District Council supports the commitment to meet the objectively assessed needs for Cambridge identified in the Cambridge Sub Region Strategic Housing Market Assessment within the City Council area.

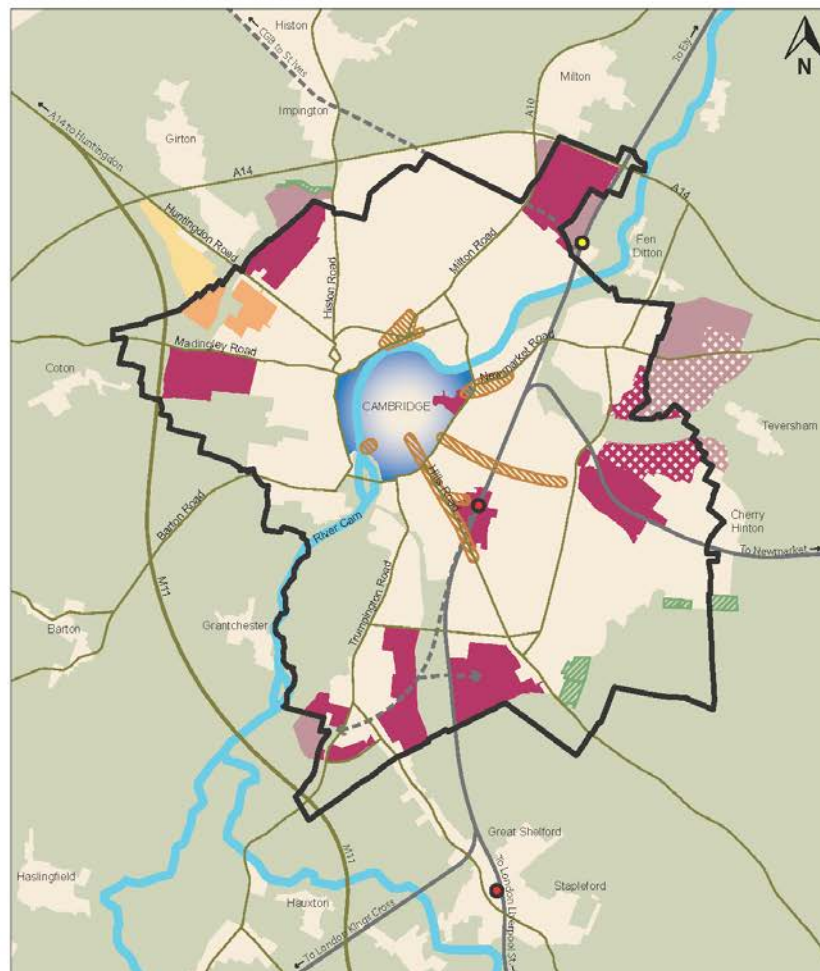
Minor Modifications suggested following Proposed Submission consultation and implications for Sustainability Appraisal

28. As a result of assessment, two minor modifications are suggested for the Vision and Figure 2.1: Key Diagram. Both changes are in the Addendum to the Cambridge Local Plan 2014: Proposed Submission document marked as PM/2/001 and PM/2/002.
29. In response to a representation (Representation Number 27316), PM/2/001 suggests that the second sentence of the Vision should read:

“The city will draw inspiration from its iconic historic core, heritage assets, river and structural green corridors, achieving a sense of place in all its parts, with generous, accessible and biodiverse open spaces and well-designed architecture.”
30. In order to correct a drafting discrepancy between Figure 2.1: Key Diagram and the Policies Map, PM/2/002 seeks the amendment of the areas of major change at Coldham’s Lane and NIAB 1 in Figure 2.1: Key Diagram to reflect the areas of major change shown on the Policies Map and on relevant figures in Section Three. See overleaf for amended Figure 2.1: Key Diagram.

31. Following consideration of the impact of these changes on the Sustainability Appraisal Framework, it has been concluded that these changes do not materially alter the findings of the Sustainability Appraisal.

Figure 2.1: Key Diagram



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- | | |
|------------------------------------|---|
| City boundary | Area of Major Change within Cambridge |
| Major road | Area of Major Change within South Cambridgeshire |
| River Cam | Area of safeguarded land within Cambridge |
| City centre | Area of safeguarded land within South Cambridgeshire |
| Train Station | Area of North West Cambridge Area Action Plan within Cambridge |
| Railway Line | Area of North West Cambridge Area Action Plan within South Cambridgeshire |
| Cambridgeshire Guided Busway (CGB) | Site to be released from the Green Belt |
| Green Belt | Opportunity Area |
| Proposed Science Park Station | |

Areas identified in South Cambridgeshire are indicative only and subject to confirmation via a review of the South Cambridgeshire Local Plan.

Policy 1: Delivering Sustainable Development

EXISTING POLICY TO BE REPLACED (2006 CAMBRIDGE LOCAL PLAN)	OPTION(S) BEING TAKEN FORWARD FROM THE ISSUES AND OPTIONS REPORT (2012) AND ISSUES AND OPTIONS 2 (2013)	OPTION(S) NOT BEING TAKEN FORWARD FROM THE ISSUES AND OPTIONS REPORT (2012)
<ul style="list-style-type: none"> Policy 3/1 	Not applicable	Not applicable

Key issues raised during Issues and Options (2012) and Issues and Options 2 (2013) consultations:

32. While no specific policy related to sustainable development was included in the Issues and Options Report (2012), as part of the Issues and Options consultation we asked people what they considered sustainable development to mean. Some of the representations received included:
- Encouraging growth that is symbiotic with South Cambridgeshire and encouraging economic development that is in character with the historic/academic heritage of the city;
 - Maintain the green and compact nature of the city;
 - Ensuring that there is a well thought out transport policy and infrastructure with significant investment in public transport and provision for cyclists and pedestrians;
 - Balancing housing/employment needs without sacrificing the quality of life and tranquillity of residents and resource availability in the city (notably water);
 - Ensuring that the historic qualities and character of the city, from individual heritage assets to the wider appreciation of townscape and landscape, and the interaction between them, is conserved and enhanced for future generations;
 - Use the Brundtland definition of sustainable development as a starting point;
 - That existing buildings, brownfield sites and infrastructure need to be optimised and retrofitted to meet future needs using high quality sustainable based design;
 - Invest in high speed digital links to enable home working and a reduction in commuter and business travel;
 - Supporting communities and individuals in community life – provision of social infrastructure for all ages.

Evidence base:

- The National Planning Policy Framework sets the context for planning in England. It is a requirement of the planning system to deliver sustainable development.
- HM Government (2005). Securing the Future: delivering the UK sustainable development strategy.

How the policy came about:

33. The purpose of the planning system is to contribute to the achievement of sustainable development. The UK Sustainable Development Strategy sets out five guiding principles of sustainable development:

- Living within the planet’s environmental limits;
- Ensuring a strong, healthy and just society;
- Achieving a sustainable economy;
- Promoting good governance; and
- Using sound science responsibility.

34. At the heart of the National Planning Policy Framework is the presumption in favour of sustainable development, which should be seen as a golden thread running through both plan-making and decision-taking. Policy 1 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 Cambridge Local Plan 2014, will ensure that all new development in the city meets the principles of sustainable development.

Findings of the Sustainability Appraisal of the Cambridge Local Plan (July 2013)

35. No adverse impacts from this Policy on the sustainability objectives were predicted as part of the Sustainability Appraisal process.

Key Issues raised during Proposed Submission consultation

Policy 1: The presumption in favour of sustainable development	
Total Representations: 37	
Object: 24	Support: 13
Objections	<ul style="list-style-type: none"> • CEG objects on the basis that allocation of land at Cambridge South East would allow for sustainable development; • The Quy Estate objects on the basis that allocation of land around Fen Ditton would allow for sustainable development; • More provision of Green Belt land should be made in the Local Plan, particularly in the area around Barton Road and south of the Addenbrooke’s Access Road; • Policy goes further than the NPPF in its presumption supporting sustainable development; • This policy allows too much development and is not sustainable; • The proposed allocations in the plan cannot be sustainable in the absence of a strategic transport plan for the city; • The policy should frame economic growth rather than being subordinate to it;

	<ul style="list-style-type: none"> • Cambridge City Council and South Cambridgeshire District Council have failed to cooperate properly; • Sustainable development is too narrowly defined; • Disability issues must fall within sustainable development; • The plan must not be developer-driven, but must respect and incorporate residents' views; • Constraints identified in the plan (paragraph 2.19) are untested; • Objectively assessed level of need should match the level of affordable housing need in Cambridge; • Further objections to GB1 Land north of Worts' Causeway and GB2 Land south of Worts' Causeway being allocated, with reference to inaccurate forecasting evidence base and release of Green Belt being in conflict with sustainability goals; • Proposed development strategy is inappropriate; • Table 2.1 should be amended to include reference to the University of Cambridge's development needs, by inserting text in the column headed 'Requirements identified by evidence base': The University of Cambridge has a substantial capital building programme which will be delivered on existing University sites.
Support	<ul style="list-style-type: none"> • The Environment Agency has participated in the joint working that has taken place with Cambridge and South Cambridgeshire. This has included cooperation between other partners with interests in the water environment such as Anglian Water and Cambridgeshire County Council to the extent that we advise that, from our perspective, Cambridge City Council has fulfilled its duty to cooperate on cross boundary matters, and issues that concern and overlap with flood risk and surface water quality. Some further liaison on groundwater protection will help to produce an effective plan. • General support; • Support for the development strategy; • Support for retention of the compact city form; • Cambridge needs housing and employment growth; • Welcome recognition of the need for leisure facilities.

Minor Modifications suggested following Proposed Submission consultation and implications for Sustainability Appraisal

36. As a result of assessment, three minor modifications are suggested for Tables 2.1 and 2.2 and paragraph 2.28 of the supporting text to Policy 1: The presumption in favour of sustainable development. All three changes are in the Addendum to the Cambridge Local Plan 2014: Proposed Submission document marked as PM/2/003, PM/2/004 and PM/2/005.

37. PM/2/003 relates to Table 2.1: Summary of other needs in the plan period. In response to a representation (Representation Number 28046), it is suggested that the text in the table row on higher and further education is amended to read:

“Both universities require land for student ~~hostels~~ rooms. The University of Cambridge has identified a need to find space for 3,016 (net) rooms for undergraduates and postgraduates to 2031.”

38. To reflect the housing trajectory produced as part of the council’s Annual Monitoring Report 2012/13, PM/2/004 suggests that paragraph 2.28 should read:

“In detail, the strategy options considered by the JST&SPG (22 May 2013) demonstrate that focusing development on Cambridge remains the most sustainable location for additional development and the Cambridge Strategic Housing Land Availability Assessment (SHLAA), ~~has identified~~ as updated with information for 2012/13 completions from the Annual Monitoring Report 2013, 3,324 identifies 3,308 new homes through windfall sites or allocations within the urban area in the new local plan.”

39. For clarity, PM/2/005 suggests inserting the word “homes” next to each number in the columns 'Structure plan 1999 to 2016' and 'New local plan strategy 2011 - 2031' in the Table 2.2: 2031 strategy approach.
40. Following consideration of the impact of these changes on the Sustainability Appraisal Framework, it has been concluded that these changes do not materially alter the findings of the Sustainability Appraisal.

Policy 2 and 3: Spatial Strategy for the location of employment and residential development

EXISTING POLICY TO BE REPLACED (2006 CAMBRIDGE LOCAL PLAN)	OPTION(S) BEING TAKEN FORWARD FROM THE ISSUES AND OPTIONS REPORT (2012) AND ISSUES AND OPTIONS 2 (2013)	OPTION(S) NOT BEING TAKEN FORWARD FROM THE ISSUES AND OPTIONS REPORT (2012)
Policy 5/1 Housing provision	<ul style="list-style-type: none"> • Option 3 Up to 14,000 new homes to 2031 – the current development strategy; • 	<ul style="list-style-type: none"> • Option 2 12,700 new homes to 2031 ‘urban growth’; • Option 4 up to 21,000 new homes to 2031 ‘enhanced levels of urban and Green Belt growth’ • Option 5 up to 25,000

		<p>new homes to 2031 'significantly increased levels of urban and Green Belt growth'</p> <ul style="list-style-type: none"> • Option 6 Plan for 10,000 new jobs to 2031; • Option 7 Plan for 15,000 new jobs to 2031; • Option 8 Plan for 20,000 new jobs to 2031
<p>NEW OPTIONS ARISING FROM TECHNICAL WORK:</p> <ul style="list-style-type: none"> • Objectively assessed needs confirmed through Cambridgeshire County Council Research and Performance team: Population, Housing and Employment Forecasts Technical report May 2013 • 22,100 new jobs to 2031 		

Key issues raised during Issues and Options (2012) and Issues and Options 2 (2013) consultations:

- The Local Plan for Cambridge must be properly integrated with plans for South Cambridgeshire. Need to look holistically at the housing and economic market area rather than at the administrative area;
- Predictions of growth are based on nothing more than speculated extensions that should not form the basis for a level of growth that would damage the special character of the city;
- Development of brownfield sites should be maximised and the Green Belt must be preserved;
- The new Local Plan should continue with the development strategy set out in the adopted Structure Plan – this remains the most sustainable approach;
- Chesterton Fen needs to be developed properly with supporting infrastructure – consideration of the needs of residential boat dwellers must be included in the Local Plan (Conservators of the River Cam);
- A core issue is whether we want Cambridge to remain a compact green city;
- A radical overhaul of the transport system must go hand in hand with any further development;
- Growth should be in excess of that presented in Option 5 (25,000) on the basis of technical work on housing need;
- Employment sites should not be converted into housing;
- Opportunities are being missed to provide more employment on sites such as Clay Farm and NIAB;
- Look to improve the quality and density of existing residential areas;
- Create areas for new housing and jobs using the connections formed by the Guided Busway;

- Provide adequate and culturally sensitive sites for travelling communities – at least 1% of affordable housing should be earmarked for them.

Evidence base:

- The National Planning Policy Framework sets the context for planning in England. It is a requirement of the planning system to deliver sustainable development.
- The National Planning Policy Framework requires local planning authorities to objectively assess development needs and to positively plan to meet those needs.
- Cambridge City Council (2012). Cambridge Local Plan Towards 2031. Issues and Options Report (including representations to that document);
- Cambridge City Council (2013). Cambridge Local Plan Towards 2031. Issues and Options 2 (Part 1 and Part 2 Documents and representations to these documents).
- SQW (2011). Cambridge Cluster Study 2011;
- Cambridge City Council (2008) Employment Land Review 2008;
- Cambridge City Council. Employment Land Review Update 2012;
- Cambridge City Council. Employment Land Review Update 2013;
- Cambridgeshire County Council. Cambridgeshire Local Economic Assessment 2011;
- Cambridgeshire County Council Research and Performance team: Population, Housing and Employment Forecasts Technical report May 2013;
- Cambridgeshire and Peterborough Joint Strategic Planning Unit – Cambridgeshire and Peterborough Joint Memorandum of Co-operation May 2013; and
- Cambridge Sub-Regional Housing Board SHMA update May 2013.

Various Inspectors' Reports have also acknowledged the importance of the Cambridge Green Belt, including:

- PINS (2006). Cambridge Local Plan Inspector's Report 2006;
- PINS (2006). Report of the Examination into the South Cambridgeshire Core Strategy Development Plan Document;
- PINS (2007). Report of the Examination into the South Cambridgeshire Development Control Policies Development Plan Document;
- PINS (2011). Report on the Examination into the Cambridgeshire and Peterborough Minerals and Waste Site Specific Proposals Development Plan Documents.

How the policy came about:

41. The National Planning Policy Framework sets out the requirement for local planning authorities to set out strategic priorities for their area in local plans, including strategic policies to deliver the home and jobs needed in the area. Policies 2 and 3 represent the refinement of a number of potential options that were consulted upon at the Issues and Options stages. These have been informed by the conclusion of the technical work that has confirmed objectively

assessed needs for homes and jobs for Cambridge over the plan period, as described in further detail below.

42. The Cambridgeshire and Peterborough local authorities have worked together in preparing technical evidence and a memorandum of co-operation and high-level long-term vision for sustainable development across the County. This will not set levels of housing and jobs by district, this is the responsibility of the City and Districts, but is evolving to provide a strategic context for this work.

Housing needs in Cambridge to 2031

43. The National Planning Policy Framework requires local planning authorities to have a clear understanding of housing needs in their area. To achieve this, they should prepare a Strategic Housing Market Assessment (SHMA) to assess their full housing needs, working with neighbouring authorities where housing market areas cross administrative boundaries. The SHMA should identify the scale and mix of housing and the range of tenures that the local population is likely to need over the plan period. This is a key part of the evidence base to address the NPPF requirement of ensuring that local plans meet the full, objectively assessed needs for market and affordable housing in the housing market area, as far as is consistent with the policies set out in the Framework.
44. The Cambridge Housing Market Area includes the five Cambridgeshire districts plus Forest Heath and St Edmundsbury districts in Suffolk. Due to its historic and functional ties with Cambridgeshire, plus its own housing market area overlapping with the Cambridge Housing Market Area, Peterborough City Council has also collaborated on this work with the other local authorities. These eight authorities have collaborated in recent months to meet the requirements of the National Planning Policy Framework. The outputs from this collaboration are a new chapter of the SHMA, which identifies the scale and mix of housing needed across the area by 2031 (and extending to 2036 for Huntingdonshire to meet its proposed local plan end date). The outcome of this work is that an additional 93,000 homes are forecast to be needed across the housing market area between 2011 and 2031, as set out in the table overleaf.

Table 1: Objectively assessed all dwelling need and affordable housing need 2011 to 2031

	Objectively assessed need 2011 to 2031
Cambridge	14,000
East Cambridgeshire	13,000
Fenland	12,000
Huntingdonshire	17,000 (21,000 to 2036)
South Cambridgeshire	19,000
Cambridgeshire	75,000
Forest Heath	7,000
St Edmundsbury	11,000
Housing sub-region	93,000

Source: Strategic Housing Market Assessment

45. The Localism Act 2011 places a Duty to Co-operate on local planning authorities. This requires them to engage constructively, actively and on an on-going basis in the preparation of development plan documents where this involves strategic matters. National policy in the NPPF adds to this statutory duty as it expects local planning authorities to demonstrate evidence of having effectively cooperated to plan for issues with cross-boundary impacts.
46. As already noted, Peterborough has a functional geographic relationship with Cambridgeshire, which is reflected in a history of joint working, notably on strategic spatial planning. Peterborough is the largest urban centre within the travel to work area for the Cambridgeshire sub-region and is a major employment location with good transport links and infrastructure. It has adopted plans for the period 2009 – 2026, which include an additional 25,500 houses.
47. Under the Duty to Co-operate, the local authorities have collectively acknowledged that Peterborough, through its ambitious growth plans, has already accommodated a proportion of the housing need arising in the Cambridge Housing Market Area, amounting to approximately 2,500 homes. Separately, Fenland and East Cambridgeshire District Councils have made considerable progress to date with their local plan reviews and, therefore, have established a good understanding of their areas' development opportunities and constraints. The July 2012 joint statement by Peterborough and the Cambridgeshire authorities confirmed that the 'strategy is to secure sustainable development by locating new homes in and close to Cambridge and Peterborough and to other main centres of employment, while avoiding dispersed development'.
48. Therefore, based on this background and the co-operation between authorities, it is proposed that, in their Local Plans, provision should be made for 11,000 dwellings in Fenland and 11,500 dwellings in East Cambridgeshire,

rather than the full identified need set out in table 1 above. This leaves 90,500 dwellings to be provided in the Cambridge Housing Market Area to ensure that the full objectively assessed need for housing in the Area will be met in forthcoming Local Plan reviews. The details of these figures are set out in table 2 below.

Table 2: Housing provision for local planning authorities in Cambridgeshire, 2011 – 2031 to be delivered through new Local Plans

	All dwelling provision 2011 to 2031
Cambridge	14,000
East Cambridgeshire	11,500
Fenland	11,000
Huntingdonshire	17,000 (21,000 to 2036)
South Cambridgeshire	19,000
Cambridgeshire	72,500
Forest Heath	7,000
St Edmundsbury	11,000
Total	90,500

49. The responses to consultations, the technical work on needs, the evidence provided by the SHLAA and its update as well as the assessment of sites available, the viability work and the interim and final sustainability appraisals provide the Councils with a robust picture of needs and supply.
50. For Cambridge and South Cambridgeshire, the Councils have jointly considered a range of possible development strategy options and associated site options. These have been tested through the Sustainability Appraisal process. They have also been tested through transport modelling and as the long list of site options has been narrowed down, key stakeholders have been asked again for their views on the emerging shortlist of sites to help further refine the preferred strategy and package of sites, such as the education authority.
51. This work has been considered by the Joint Strategic Transport and Spatial Planning Group (JST&SPG), the member governance group set up to guide the collaborative preparation of development plans in Cambridge and South Cambridgeshire and the associated Transport Strategy.
52. The broad strategy options considered by the JST&SPG¹ demonstrates that focusing development on Cambridge remains the most sustainable location for additional development and the Cambridge SHLAA has identified 3,324 new homes through windfall sites or allocations within the urban area in the new Local Plan.

¹ 22 May 2013

53. The edge of Cambridge is the next most sustainable location for growth in the development sequence. However, the joint Sustainability Appraisal of the overall strategy identifies the importance of balancing the accessibility aspects of sustainable development and the environmental and social benefits it brings, against the significant harm to the landscape and setting of the city, and environmental aspects of sustainability that development on land in the Green Belt would have. This would have resulting irreversible adverse impacts on the special character of Cambridge as a compact historic city and the risks that could have to the economic success of the Cambridge area, which is in part built on its attractiveness as a place to live and work. The detrimental impacts of further major development on the edge of Cambridge were demonstrated in the Inner Green Belt Study Review 2012. The assessment process identified six Green Belt sites as potential options for development and this limited refinement of the Green Belt would mean that Cambridge is able to meet its full objectively assessed needs within its administrative area.
54. The conclusion of consideration of reasonable site options for development on the edge of Cambridge is to require development away from the edge of Cambridge to meet the remaining development needs of the wider Cambridge area. The Sustainability Appraisal of broad locations undertaken as part of the joint work presented to the JST&SPG demonstrates clearly that new settlements are the next most sustainable location for growth and that development at villages should be limited for sustainability reasons.
55. The Councils have followed an iterative process in developing the preferred strategy. For Cambridge, the level of objectively assessed need is such that all reasonable options have needed to be included in the Local Plan and the council does not consider that any reasonable alternatives exist for meeting the level of need.
56. For South Cambridgeshire, the options available are the new settlements identified in the new Local Plan and the best available sites in the better served villages.
57. A comparison with the Structure Plan 2003 strategy is provided below.

	Structure Plan 1999 to 2016	Percentage	New Strategy 2011 - 2031	Percentage
Cambridge Urban Area	8,900	27	6,611	20
Cambridge Fringe Sites	8,000	25	11,891	35
New Settlements	6,000	18	10,335	31
Villages	9,600	30	4,748	14
TOTAL	32,500	100	33,585	100

58. The overall percentage of development at Cambridge has actually been increased slightly compared to the previous strategy, with 55% compared with the previous 52%. New settlements have been given a more prominent role than village development with the proportions effectively swapping over. This demonstrates that the proposed new development strategy remains sustainable and is actually more sustainable than the strategy originally proposed in the Structure Plan.
59. Cambridge City Council intends to meet its objectively assessed housing needs in full, within its administrative boundary. The sites and policies that will address the supply of housing to meet these needs, including affordable housing provision are identified in section 3 and 6 of the plan, along with the proposals schedule in Appendix B and the Policies Map.

Green Belt sites as part of the spatial strategy

60. The National Planning Policy Framework provides for Green Belts to be established and revised through local plans, to provide a long term framework having regard to the need to promote sustainable development. The current Cambridge Green Belt was last altered following the 2003 Structure Plan and was intended to last until 2016. However circumstances change and major development at Cambridge East will no longer be deliverable for the foreseeable future. Good progress is being made with the current strategy with the exception of Cambridge East but insufficient land has been found within the urban area of Cambridge to meet identified objectively assessed needs.
61. The National Planning Policy Framework requires that Green Belt boundaries are established in Local Plans, that the boundaries can endure beyond the end of the plan period (2031) and that consideration is given to the consequences for sustainable development of channelling development towards urban areas inside the inner Green Belt boundary, towards villages within the Green Belt and towards locations beyond the outer Green Belt boundary. The Local Planning Authorities have taken and will continue to take a sequential sustainable approach to the location of growth using city brownfield land first before considering land on the edge of Cambridge (including land in the Green Belt), in new settlements beyond the outer Green Belt boundary and then in the most sustainable villages. Considerable and extensive work has been undertaken to assess sites for allocation in the new Local Plan to meet this objectively assessed need, and where possible sites within the urban area have been prioritised.
62. A joint review of the inner Green Belt boundary has established that there is no scope for major Green Belt releases without there being very significant detriment to the purposes of the Cambridge Green Belt. The review did identify several small sites which could be released from the Green Belt on the

edge of Cambridge where the detriment would not be significant to Green Belt purposes. The exceptional circumstances arising from the need to meet the residue of objectively assessed need for homes within Cambridge city's administrative boundary means that these small sites are needed. The Local Plan has to consider objectively assessed needs and how these might be met over the plan period in a sustainable way. On balance the level of harm to Green Belt purposes in losing these small sites is judged to be acceptable when weighed against the broader needs of the City to 2031. This finding together with the guidance in the National Planning Policy Framework concerning sustainability and the need to establish a durable Green Belt boundary provides justification for the release of land from the Green Belt for development.

Jobs needs in Cambridge

63. The National Planning Policy Framework requires local planning authorities, working with others, to prepare and maintain a robust evidence base to understand both existing business needs and likely changes in the market and to understand their changing needs and identify and address barriers to investment, including a lack of housing, infrastructure or viability. This evidence base should be used to assess the need for and supply of employment land or floorspace.
64. The Joint (City and South Cambridgeshire District) Employment Land Review update 2012 looked at demand for, and supply of, employment land in Cambridge and South Cambridgeshire in more detail. The Employment Land Review update 2012 concludes that there is a need for between 13.1ha and 16.2ha of employment land in Cambridge and between 42.4ha and 43.3ha in South Cambridgeshire. The Employment Land Review update 2013 concluded that there is a need for 7.4ha of employment land in Cambridge. The figures were updated in 2013 for Cambridge as the Cambridgeshire authorities agreed through the memorandum of understanding to use the housing and job forecasts from the East of England Forecasting Model, rather than Cambridge Econometrics Local Economic Forecasting Model, which had been used to inform 2012 Employment Land Review update. This allowed for a consistent consideration of jobs growth to be considered across the County. More detail on the models and the supply of employment land can be found in the audit trail for policy 40 Development and Expansion of Business Space.
65. The cluster of high technology companies in and around Cambridge, (variously known as the Cambridge Phenomenon, the Cambridge Cluster or Silicon Fen) have driven the success of the local economy for the last 50 years. While over the last 10 years jobs growth has slowed, future projections of job growth in the area are still strong. The supply of employment land planned for in this plan meets the needs identified in the evidence, indeed the 12.01ha exceeds the 7.4ha identified, this allows for flexibility within the supply of employment land. There will always be a certain amount of churn as businesses start and

grow and move to new premises to meet their needs, a larger supply of employment land means that there is more likely to be empty land or floorspace to move into, and businesses will not have to wait as long for someone else to move out. This also means that the inherent uncertainties in forecasts will not unnecessarily constrain business growth.

66. In the summer of 2012, the council consulted upon potential options for accommodating different levels of housing and job growth to 2031. For jobs these were between 10,000 and 20,000 new jobs; and for homes between 12,700 and 25,000. South Cambridgeshire District Council, with responsibility for parts of the city of Cambridge and for the area that surrounds Cambridge, consulted upon jobs growth between 14,000 and 29,200, and housing growth between 18,500 and 23,500.
67. The responses to consultations, the technical work on needs, the evidence provided by the Employment Land Review and its update as well as the assessment of sites available and the interim and final sustainability appraisals provide the council with a robust picture of needs and supply. The council intends to meet its objectively assessed jobs needs within its administrative boundary and the land supply requirements and policies to meet that need are set out in sections three and five of the plan, with other allocations shown on the proposals schedule (Appendix B) and the Policies Map.

Findings of the Sustainability Appraisal of the Cambridge Local Plan (July 2013)

68. Policy 2 sets the target for 12ha of employment land to be delivered over the plan period. Provision has been made for varied employment opportunities however with a particular focus on knowledge based industries and institutions, of which there will be a range of sites and sizes. Policy 40 supports proposals that help reinforce the existing high technology and research cluster of Cambridge. Delivering such a quantum of employment land of varying sizes should lead to significant positive effects in terms of ensuring provision of appropriate office space for small and growing high tech businesses and research sectors and high tech headquarters, whilst also providing the potential for high tech manufacturing. The provision of employment land and support for the Universities (as described above) should capitalise upon Cambridge's reputation and maintain Cambridge's competitiveness in attracting investment and business.
69. The spatial strategy set out in the Local Plan includes policies dictating the amount of development to be expected in the City to 2031. Policy 2 notes that an additional 12 hectares of employment land are to be brought into use over the Plan period, with Policy 3 meanwhile requiring the delivery of 14,000 additional dwellings. This level of development may place additional strain on the quality and availability of the City's water resources, both through direct impacts (through abstraction) and indirect impacts (such as pollution). The

appraisal notes that there are policies in the plan that seek to deal with these impacts.

70. Policy 3 sets out the spatial strategy regarding residential development whilst Policy 2 sets out the spatial strategy for employment development. Policy 13 sets out the general principles for development at the Areas of Major Change, of which three (Policies 15, 16 and 17) fall within the South Cambridge Functional Area. Additionally, a number of Site Specific Development Opportunities are located in the area under Policy 26. Taken together these policies provide for a significant amount of development in the area, with which it will be important to deliver successful new communities.
71. Policy 3 sets out the overall development strategy for the location of residential development and seeks to focus the majority of new development in and around the urban area of Cambridge. Concentrating new development within the urban area where there are already well established local centres offering a wide range of existing facilities should help to maximize the number of residents accessing services and facilities locally, thereby reducing the requirement for/frequency of longer distance journeys being made and should help to reduce the use of the private car.
72. A number of the policies set out in the Local Plan seek to guide development to the most appropriate locations within the City. Policies 2 and 40 seek to direct employment-related development to the city centre and other key employment areas, which may have help to minimise effects on biodiversity. This approach could potentially be further strengthened by following the approach of Policy 3 which makes clear the need for development to make best use of previously developed land. However, it would also be important to take into account the fact that brownfield sites will often be of greater biodiversity importance than greenfield (Green Belt) sites. In light of this fact, it is also important to draw attention to Policy 4, which focuses on protecting the Green Belt.
73. The appraisal made the following recommendation regarding the economy:

Ensure that new employment areas have strong transport links to Kings Hedges and Abbey Ward areas so that residents of these income and employment deprived areas can take advantage of new employment opportunities elsewhere in the city. It is notable that no policy is directed specifically at addressing problems of deprivation in these areas, albeit it is recognised that Cambridge is a compact city and hence wherever employment is located it will be relatively easy to access by public transport or bicycle.
74. The draft plan has area specific policies and more general policies that seek to ensure new pedestrian, cycle and public transport links are created where

appropriate. No changes were made to the plan following this recommendation.

Key Issues raised during Proposed Submission consultation

Policy 2: Spatial Strategy for the Location of Employment Development	
Total Representations: 16 (including a petition signed by 2,025 people)	
Object: 14 (including a petition signed by 2,025 people)	Support: 2
Objections	<ul style="list-style-type: none"> • Petition signed by 2,025 people and other respondents opposing the further destruction of the Cambridge Green Belt on the basis of: <ul style="list-style-type: none"> ○ lack of exceptional circumstances to justify release of Green Belt land; ○ urban sprawl impacting on the historic and compact character of the city, its surrounding villages and countryside and impact on traffic congestion; ○ plans being based on out-of-date growth forecasts and first consideration should be given to greater re-use of existing brownfield sites not in the Green Belt. • Insufficient certainty provided that sites GB3 and GB4 (Fulbourn Road, west 1 and 2) will support the Cambridge Cluster, incorporate text to assess a firm’s need to locate to these sites so as to support the continued growth of the nationally significant Cambridge Cluster; • The projections for employment generation over the next two decades cannot be forecast with the precision implied in the plan; • The relationship between employment projection and housing target is far from clear – for example, many of the new homes will be occupied by people commuting to London and therefore not contributing to the Cambridge job market; • Mixed use developments are important. The city needs smaller work spaces that contribute to diverse mixed-use communities; • The need for larger employment 'zones' is understood, but there is no evidence of a study into whether these uses could coincide with residential provision. To learn from North West Cambridge providing housing and local centres at the new employment site released from the green belt; • There is a lack of flexibility toward providing small, low cost employment spaces. Flexibility of use and temporary use allowances would provide the mix of size, type and location of creative work spaces the city is lacking; • The plan threatens the loss of our current office space in the Clifton Road area; • The plan fails to address the need for office space in central Cambridge more generally. Our business -- and other Cambridge

	<p>Cluster businesses -- will be harmed if unable to locate in central Cambridge;</p> <ul style="list-style-type: none"> • Concern that the plan's broad-brush approach to spatial strategy ignores the needs of knowledge-based, high-tech businesses like ours to be located truly centrally. It would help to identify and consider a "central Cambridge area" such as defined by the area within a 1.25 mile radius from Market Hill; • Object to the assessment of 22,100 new jobs in Cambridge when many of these are not new jobs but relocation of existing jobs from elsewhere in the country. Cambridge should be more selective than this and this policy should address this issue, which has a direct and malign impact on housing availability in the city. Cambridge should try to ensure that new jobs arise from the growth in the local economy rather than importation of existing jobs, often from areas of the country with less buoyant economies, which can impact on the opportunities for genuine local job creation; • The exclusion of the Triangle site from the specific allocations within the plan would be a potential oversight if not now addressed given the very significant potential for new sustainable employment development that the site offers; • Object to anything other than very limited further employment development, due to the already huge transport problems of commuters getting into Cambridge, the lack of housing and the corresponding imbalance of housing and jobs within the city; • Insufficient land has been allocated for employment use. The employment requirement should be 245,000sqm on 46 hectares of land. The proposed allocations are either not available, not suitable or will be subject to deliverability issues. There are no large scale employment allocations proposed to support the economy. Provision for B1 (b) research and development is location sensitive in Cambridge. Employers want to be located in, or on the edge of Cambridge to attract employees and foster academic links. The proposed science park at Cambridge South site would meet the forecast employment land requirements; • Cambridge has reached capacity and is unable to absorb further development over and above that already committed to. You cannot go on shoe horning houses and industry in to the very limited space available within the city. If further development is seen as vital, then the council is urged to look at brownfield sites or to locate such developments outside the city if there are no available sites within the city. Continued expansion at the expense of the Green Belt is not an acceptable option; • Oppose further destruction of the Green Belt. There are no exceptional circumstances that justify it; • Oppose urban sprawl that will destroy the historic, compact character of Cambridge, its surrounding villages and countryside
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	<p>and will further add to traffic congestion;</p> <ul style="list-style-type: none"> • The councils' plans are based on out-of-date growth forecasts and first consideration should be given to greater re-use of existing sites (including brownfield) not in the Green Belt; • Too much weight on Green Belt protection at the expense of economic development in sustainable locations; • The employment sites identified will satisfy employment requirements for the 5-10 year period; • Insufficient capacity for other smaller companies who may wish to establish an operating base within or on the edge of Cambridge; • Lack of space within existing plots may necessitate business relocation within the Cambridge fringes; • The simplified process of Prior Notification could potentially lead to a large loss of office stock within the city, which in turn may drive greater demand for more strategic employment sites on the edge of Cambridge; • The employment targets should be more ambitious to reflect the significant level of desirability that Cambridge offers to global business; • Greater variety and number of sites identified for employment development within the city and on Green Belt to ensure that there is a flexible supply of employment sites in and around the city; • Consideration should also be given to the potential loss of existing B1(a) buildings to C3 (residential) uses under recent changes to Permitted Development Rights; • The plan requires additional employment land sites (as required by NPPF policy) to meet the Local Plan's employment forecasts; • Growth should be targeted towards non Green Belt locations as part of the overall strategy across Cambridge and South Cambridgeshire.
Support	<ul style="list-style-type: none"> • This policy provides an appropriate level of continuing development; • This town needs to embrace growth and the provision of employment opportunities for all.

Policy 3: Spatial Strategy for the Location of Residential Development	
Total Representations: 58 (including a petition signed by 2,025 people)	
Object: 47 (including a petition signed by 2,025 people)	Support: 11
Objections	<ul style="list-style-type: none"> • Petition signed by 2,025 people and other respondents opposing the further destruction of the Cambridge Green Belt on the basis of: <ul style="list-style-type: none"> ○ lack of exceptional circumstances to justify release of Green Belt land;

	<ul style="list-style-type: none"> ○ urban sprawl impacting on the historic and compact character of the city, its surrounding villages and countryside and impact on traffic congestion; ○ plans being based on out-of-date growth forecasts and first consideration should be given to greater re-use of existing brownfield sites not in the Green Belt. ● The EEFM figure for the demand for new dwellings by 2031 is 12,500 not 14,000. As such there is no justification for spoiling the Green Belt; ● The plan will not adequately provide for Cambridge's housing needs. The plan should release additional lands in Broad Locations 1 and 5 of the Issues and Options Part 1 Joint consultation document; ● Other alternative sites should have been explored, e.g. the use of the brownfield site at the redundant Barrington Cement works; ● Concern about impacts on transport infrastructure; ● Anglia Ruskin University are concerned that the assessment of, and approach to, housing need and its strategy for the location of residential development are unsound. The level of housing growth needs to be reconsidered, making provision for a higher level of provision in order to support the city's economy, tackle affordability and address climate change; ● Sites GB1 Land north of Worts' Causeway and GB2 Land south of Worts' Causeway should be the option of last resort. Alternative sites in South Cambridgeshire should be explored further. Priority should be given to the development of new settlement along good transport links; ● Brownfield first approach should be taken; ● Cambridge needs smaller mixed commercial, retail and residential places; ● A sequence of order of proposed developments in essential to prevent a scramble first for the easy greenfield sites; ● The housing trajectory is wildly over-optimistic and unrealistic; ● The number of windfall sites has been underestimated; ● The release of Green Belt land should be better investigated in terms of the location's suitability for such a development and possibility of housing these numbers through densification on other, better connected sites; ● Some measure of temporary change of use or a live/work environment should be feasible on sites allocated for residential use; ● Sites GB1 Land north of Worts' Causeway and GB2 Land south of Worts' Causeway should be removed from this policy; ● Grosvenor/Wrenbridge state that the plan is unsound in its assessment of, and approach to, housing needs in relation to its
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	<p>strategy for the location of residential development. The methodology used to assess need is flawed. The plan does not look beyond 2031 and hence does not comply with the NPPF. An alternative strategy needs to be set out which maximises the potential growth at Cambridge in order to meet housing needs, support the economy, address affordability and tackle Climate Change;</p> <ul style="list-style-type: none"> • The policy is inconsistent with the terms of windfall housing allowances in the NPPF. The figure should be 706 more, negating any requirement for Green Belt release. The windfall allocation should be amended to take into account the ability to make allowances for windfalls during the first 10 years of the Local Plan; • There will be a shortfall in meeting the housing target as a result of overestimating the capacity of Proposal site R21 315 – 349 Mill Road and Brookfields, which TCG and McLaren Group are pursuing for the development of student accommodation for Anglia Ruskin University in line with the current local plan allocation; • The demographic modelling used to inform the housing target is not robust and the proposed housing target represents a reduction compared with the current adopted target, is insufficient to meet affordable housing needs. The target should be increased to a minimum of 21,300 dwellings between 2011 and 2031; • The evidence base is flawed and does not take into account the most up to date Census information. Market signals have not been taken into account and the assessment uses a basic approach to relate population to dwellings through the use of an occupancy rate. No consideration has been given to how the age structure of the population is expected to change over time and the level of historic under supply of housing has not been considered. The Cambridge South site should be allocated for employment and housing to meet a higher housing target of 21,300 dwellings; • Concern that 893 of the identified housing supply capacity would not be deliverable (sites R6, R8, R14, M1, M2 and M5 are not deliverable within the plan period). There is a need to monitor closely the delivery of housing within both districts and to consider an appropriate mechanism for redistribution in the event of a shortfall becoming apparent; • The extent of land available at GB1 Land north of Worts' Causeway should be reduced to 4.3 hectares and lower density housing should be provided for on the site; • Cambridge has reached capacity and cannot absorb further development; • Based on 2011 Census, housing number should be 12,700 not
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	<p>14,000;</p> <ul style="list-style-type: none"> • Insufficient regard has been given to the inter-relationship of the employment objectives of the plan and the requirements for housing by various groups. Too much reliance has been placed on an historic process of outward-migration of poorer households from Cambridge; • Too little housing is planned for the north of Cambridge, which is a surprise given its close proximity to the high tech cluster of the Cambridge Science Park and the Northern Fringe East. Land at Fen Ditton should be considered in the interests of delivering the most sustainable form of development of Cambridge/South Cambridgeshire; • Nathaniel Lichfield and Partners have identified a need for 42,000 to 45,000 new homes in Cambridge/South Cambridgeshire over the plan period. The Cambridge South East location should be allocated to help meet this need; • There is a need to carry out a review of all major developments since the 2006 Plan was adopted to see what the impact of these have been prior to more growth being committed to; • Allowance of 92.5 dwellings through windfall per year in the local plan is not enough. Usual rate is 325.33 per year. 2011 & 2012 contributed 235 and 191 respectively. Even if no further allocation for the remaining eight years of the plan, using the 2011-2012 average as a guide, over the second half of the plan period, it would equate to an additional 2130, making total of 2556 or 706 more than windfall allowance made by the council meaning no need for Green Belt loss. Take GB1 Land north of Worts' Causeway and GB2 Land south of Worts' Causeway out of plan.
Support	<ul style="list-style-type: none"> • Strong support for policy – more homes need to be located close to the city not at a distance which creates congestion and pollution; • The proposed focus accords with the NPPF in encouraging the reuse of brownfield land; • Pleased to see that options for additional large scale development in the inner Green Belt have been rejected as they would have been very destructive to the setting of the city, particularly around Trumpington; • Strong support for the approach of focussing majority of new development in and around the urban area which will create strong, sustainable, cohesive and inclusive mixed-use communities; • The Environment Agency supports the approach being taken, which is justified by the evidence base contained within the Water Cycle Study, Surface Water Management Plan and Strategic Flood Risk Assessment; • Fenland District Council welcomes the provision of 14,000

	additional homes for the city. This is in line with the Cambridgeshire and Peterborough Memorandum of Cooperation published in Spring 2013.
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Minor Modifications suggested following Proposed Submission consultation and implications for Sustainability Appraisal

75. As a result of assessment, three minor modifications are suggested for paragraph 2.43, Table 2.3: Housing provision to 2031 and Figure 2.2: Housing Trajectory supporting Policy 3: Spatial strategy for the location of residential development. All three changes are in the Addendum to the Cambridge Local Plan 2014: Proposed Submission document marked as PM/2/006, PM/2/007 and PM/2/008.

76. PM/2/006 is a suggested change to paragraph 2.43 to reflect the housing trajectory produced as part of the council’s Annual Monitoring Report 2012/13:

“As of April ~~2012~~ 2013, there is planning permission for ~~9,385~~ 8,400 new homes within the urban area and in the agreed urban extensions. There are a further ~~721~~ 732 planned dwellings on existing allocated sites that do not have planning permission. Completions between 2011/12 and 2012/13 account for ~~331~~ 813 dwellings. In addition, the Council’s strategic housing land availability assessment (SHLAA), which assesses the capacity for future housing within the existing urban area, together with the findings of the council’s annual housing trajectory, indicates capacity for a further ~~3,754~~ 3,738 dwellings in the urban area of Cambridge (including two small Green Belt releases). Taken together, these could provide ~~14,191~~ 14,091 new homes for Cambridge over the local plan period (See Table 2.3 – Housing provision to 2031).”

77. PM/2/007 is a suggested change to Table 2.3: Housing provision to 2031 to reflect the housing trajectory produced as part of the council’s Annual Monitoring Report 2012/13:

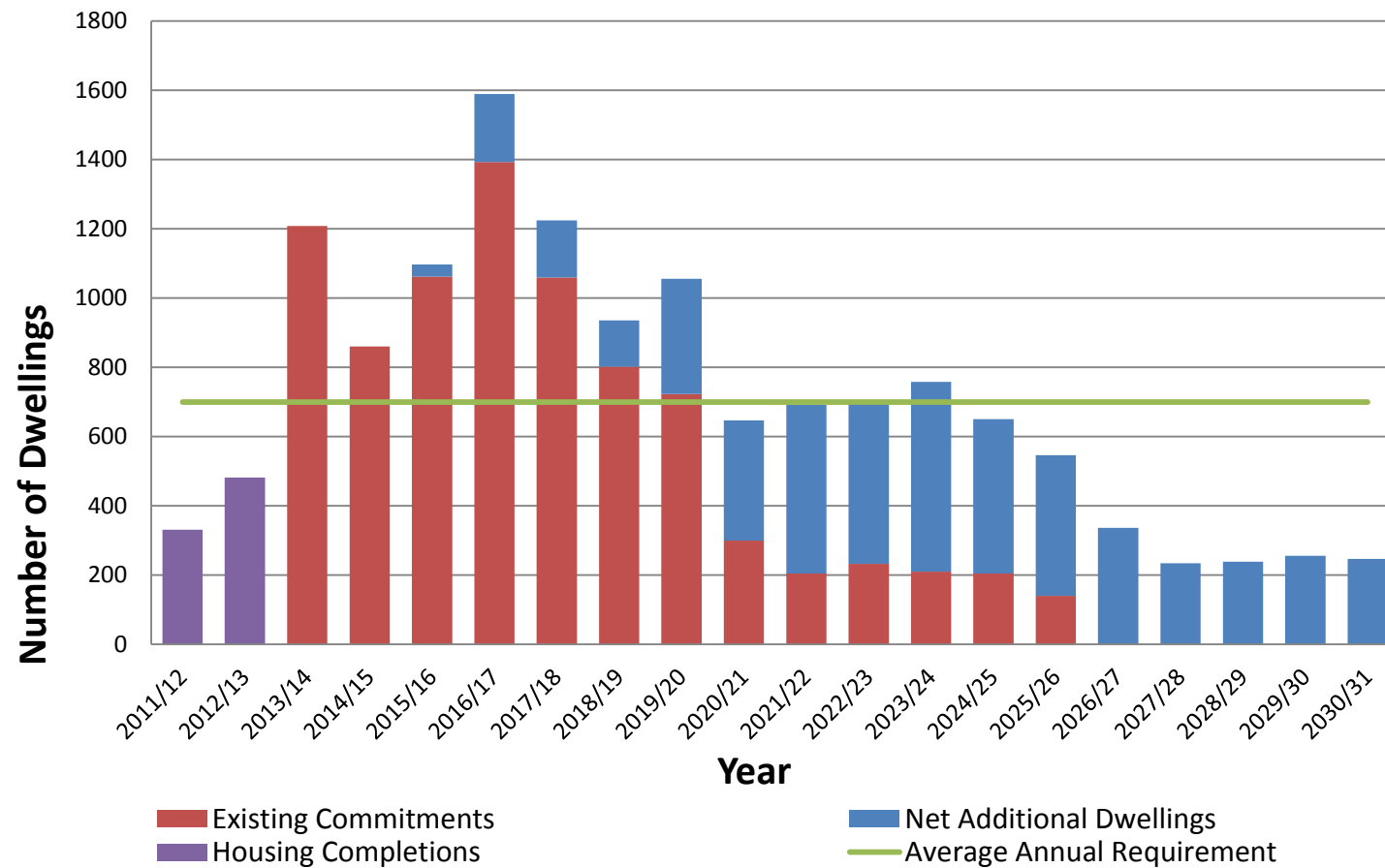
Table 2.3: Housing provision to 2031

Dwelling provision 2011 to 2031	Number of dwellings
Completions	
Completions 2011 - 2012	331
Completions 2012 – 2013	<u>482</u>
Existing Commitments	
Urban extensions with planning permission	7,000 <u>6,659</u>
Urban extensions without planning permission	408
Large allocations with planning permission	1,563 <u>1,346</u>
Allocated sites without planning permission	721 <u>732</u>

Deliverable sites with planning permission (not allocated)	414 <u>395</u>
Potential supply	
Local plan review allocation sites	1,904 <u>1,888</u>
Windfall	1,850
Total	14,191 <u>14,091</u>
Surplus	191 <u>91</u>

78. PM/2/008 is a suggested change to Figure 2.2: Housing Trajectory to reflect the housing trajectory produced as part of the council's Annual Monitoring Report 2012/13 and can be viewed overleaf.
79. Following consideration of the impact of these changes on the Sustainability Appraisal Framework, it has been concluded that these changes do not materially alter the findings of the Sustainability Appraisal.

Figure 2.2: Housing Trajectory



Policy 4: The Cambridge Green Belt

EXISTING POLICY TO BE REPLACED (2006 CAMBRIDGE LOCAL PLAN)	OPTION(S) BEING TAKEN FORWARD FROM THE ISSUES AND OPTIONS REPORT (2012) AND ISSUES AND OPTIONS 2 (2013)	OPTION(S) NOT BEING TAKEN FORWARD FROM THE ISSUES AND OPTIONS REPORT (2012)
Policy 4/1 Green Belt	Option 20 Green Belt	Not applicable

Key issues raised during Issues and Options (2012) and Issues and Options 2 (2013) consultations:

SECTION OF ISSUES AND OPTIONS REPORT (2012)	KEY ISSUES ARISING FROM CONSULTATION
Option 20: Green Belt	<ul style="list-style-type: none"> • A large proportion of comments state that the Green Belt and open spaces are special, should be protected and not built upon; • A policy for protection of the Green Belt is vital; and • There should be a presumption against development within the Green Belt in the Local Plan.

Evidence base:

- Cambridge City Council (2002): Inner Green Belt Boundary Study 2002;
- LDA (2002): Cambridge Green Belt Study;
- The 2003 Cambridge Landscape Character Assessment;
- Cambridge City Council (May 2012): Inner Green Belt Appraisal; and
- Cambridge City Council (December 2012): Inner Green Belt Boundary Study.

Various Inspectors' Reports have also acknowledged the importance of the Cambridge Green Belt, including:

- PINS (2006). Cambridge Local Plan Inspector's Report 2006;
- PINS (2006). Report of the Examination into the South Cambridgeshire Core Strategy Development Plan Document;
- PINS (2007). Report of the Examination into the South Cambridgeshire Development Control Policies Development Plan Document;
- PINS (2011). Report on the Examination into the Cambridgeshire and Peterborough Minerals and Waste Site Specific Proposals Development Plan Documents.

How the policy came about:

80. The Cambridge Green Belt serves a number of purposes, namely:
- To preserve the unique character of Cambridge as a compact dynamic city with a thriving historic city centre;
 - To maintain and enhance the quality of its setting; and
 - To prevent communities in the environs of Cambridge from merging into one another and with the city.
81. The National Planning Policy Framework attaches great importance to Green Belts, and requires that Green Belt boundaries are established in Local Plans, that the boundaries can endure beyond the end of the plan period (2031) and that consideration is given to the consequences for sustainable development of channelling development towards urban areas inside the inner Green Belt boundary, towards villages within the Green Belt and towards locations beyond the outer Green Belt boundary.
82. The current Green Belt was last altered following the 2002 Structure Plan and was intended to last until 2016. However circumstances change and major development at Cambridge East will no longer be deliverable for the foreseeable future. Good progress is being made with the current strategy with the exception of Cambridge East but insufficient land has been found within the urban area of Cambridge to fully meet identified objectively assessed needs. The Council's are currently reviewing their Local Plans to 2031 and have to have regard to future settlement policy and future Green Belt. The Cambridgeshire Local Planning Authorities have taken and will continue to take a sequential sustainable approach to the location of growth using City brownfield land first before considering land on the edge of Cambridge (including land in the Green Belt), in new settlements beyond the outer Green Belt boundary and then in the most sustainable villages. A joint review of the inner Green Belt boundary has established that there is no scope for major Green Belt releases without there being very significant detriment to the purposes of the Cambridge Green Belt. The review did identify several small sites which could be released from the Green Belt on the edge of Cambridge where the detriment would not be significant to Green Belt purposes. The exceptional circumstances arising from the need to meet the residue of objectively assessed need for homes within Cambridge city's administrative boundary means that these small sites are needed. The Local Plan has to consider objectively assessed needs and how these might be met over the plan period in a sustainable way. On balance the level of harm to Green Belt purposes in losing these small sites is judged to be acceptable when weighed against the broader needs of the City to 2031. This finding together with the guidance in the National Planning Policy Framework concerning sustainability and the need to establish a durable Green Belt boundary provides justification for the release of land from the Green Belt for development.

83. A concern raised during consultation on the Issues and Options (2012) and Issues and Options 2 reports was that further release of land from the Green Belt would lead to the coalescence of Cambridge with nearby villages. The new Green Belt boundary proposed on the edge of sites GB1 and GB2 (land north and south of Worts' Causeway) and land south of Fulbourn Road (sites GB3 and GB4) will serve to prevent further built development from encroaching on the surrounding necklace villages, key landscape, and historic features beyond the edge. Given the distance between these sites and nearby villages, it is considered that there is no risk of coalescence. One of the purposes of Green Belt is to prevent this happening, and the council considers that once a new boundary is confirmed this will provide a more defensible Green Belt boundary, serving to prevent any further encroachment occurring.
84. The 2012 Green Belt Appraisal fully recognised the qualities of the landscape to the south on the higher ground, which, as residents say is among the best to be found in the Cambridge area. The new Cambridge Green Belt boundary suggested is intended to be long term and endure beyond the plan period. At Worts' Causeway planting and landscaping of its eastern boundary will form a stronger and distinctive urban edge and will serve to enhance the setting maintain the openness of the surrounding landscape and protect historic features. Its Green Belt status will prevent development creeping any closer to the Gog Magogs and open countryside. The Council acknowledges the unique quality this area has and the physical and psychological benefits of having such high quality open land near where city residents live. It does not however consider this will be harmed by a discrete development some distance away at the bottom of the slope. Indeed the development of this land could serve to enhance the enjoyment of the surrounding countryside by taking steps to reduce traffic in the area, maintain the country lane feel of Worts' Causeway and opening up permissive paths and green infrastructure improvements to help improve such access and enjoyment.
85. At the land south of Fulbourn Road, the proposed small Green Belt release does not cause significant harm to Green Belt purposes. The site is to be allocated for employment uses, and development could be cut into the hill side in the same way as the Peterhouse Technology Park in order to minimise its visual impact when seen from higher ground to the south of the site. Appropriate planting and landscaping would be undertaken on the southern boundary of the site to form a stronger and distinctive urban edge. A wildlife corridor could also be established as part of the development to retain any routes between the adjacent nature reserves and Site of Special Scientific Interest and the wider countryside for wildlife. Improved rights of way could be negotiated as part of the development of this site to provide safer access to the open countryside.

Findings of the Sustainability Appraisal of the Cambridge Local Plan (July 2013)

86. Area-wide policies such as Policy 4 (The Cambridge Green Belt) seek to protect the Green Belt from development unless very special circumstances can justify it. This policy should prevent inappropriate development in the Green Belt, thereby helping to preserve the unique setting and special character of the city. Similarly Policy 8 (Setting of the City) seeks to ensure that the area between the urban edge and the countryside is protected from inappropriate development. The policy will only allow planning permission to be granted for development proposals on the urban edge where it can demonstrate that it “responds to, conserves and enhances the landscape setting, approaches and special character of the city”.
87. An important type of open space in the West Cambridge Functional Area is the Green Belt, with Newnham Ward lying adjacent to the countryside, with areas of Green Belt running through and around the built-up area. Such areas are recognised for their role in providing for sport and recreation, amenity and biodiversity. With this being the case, Policy 4 is likely to result in positive social and environmental effects given its focus on protecting the Green Belt from development except in very special circumstances. Similarly Policy 8 (Setting of the City) seeks to ensure that the area between the urban edge and the countryside is protected from inappropriate development, by requiring proposals to demonstrate that they respond to, conserve, and enhance the landscape setting; again with likely positive effects.

Key Issues raised during Proposed Submission consultation

Policy 4: The Cambridge Green Belt	
Total Representations: 89 (including a petition signed by 2,025 people)	
Object: 73 (including a petition signed by 2,025 people)	Support: 16
Objections	<ul style="list-style-type: none"> • CEG, Grosvenor/Wrenbridge, Turnstone Estates, North of Barton Road Landowners Group object on the basis that the evidence base is flawed and a review of the Green Belt is required; • CEG object on the basis that larger areas of Green Belt, including Cambridge South East area available for release to meet the identified needs for homes and jobs. • Grosvenor/Wrenbridge object on the basis that land to the west of Hauxton Road at Trumpington should be released from the Green Belt and allocated to meet the need for new homes and sporting facilities in the form of the Cambridge Sports Village; • Turnstone Estates object on the basis that the Teardrop Site should be released from the Green Belt and allocated for development; • North of Barton Road Landowners Group object on the basis that land to the north of Barton Road should be released from the

	<p>Green Belt and allocated for development.</p> <ul style="list-style-type: none"> • The Quy Estate object on the basis that land in South Cambridgeshire at Fen Ditton should be released from the Green Belt and allocated for development. • Pigeon Land object on the basis that the methodology used to assess the Green Belt was flawed and the site at Cambridge South is no more important to the purposes of the Green Belt than the sites proposed for allocation; • RLW Estates and Defence Infrastructure Organisation object on the basis that the small-scale Green Belt releases proposed could impact on proposed alternative locations for development, such as Waterbeach New Town; • Cambridgeshire County Council seeks amendments to the policy to strengthen the County Council’s case in instances where a departure application would be required for delivery of education provision in the Green Belt. They require the policy to read: “Planning permission will only be granted for new development in the Green Belt provided it meets the requirements and objectives of the National Planning Policy Framework.” • Natural England considers that, without a criteria based policy relating to the protection and enhancement of soils, the plan is not consistent with national policy and therefore unsound; • More of the Green Belt should be identified for housing, particularly around Barton Road and south of the Addenbrooke’s access road; • Review of the Green Belt should include an assessment of land for safeguarding; • Need for presumption against development in the Green Belt; • Petition signed by 2,025 people and other respondents opposing the further destruction of the Cambridge Green Belt on the basis of: <ul style="list-style-type: none"> ○ lack of exceptional circumstances to justify release of Green Belt land; ○ urban sprawl impacting on the historic and compact character of the city, its surrounding villages and countryside and impact on traffic congestion; ○ plans being based on out-of-date growth forecasts and first consideration should be given to greater re-use of existing brownfield sites not in the Green Belt. • Release of the Green Belt sites around the city is not proven due to the flawed approach to Green Belt evidence base and inadequate justification; • Inadequate evidence base on the historic environment and the river corridor; • Inconsistent argument to preserve the Green Belt, but provide development on the Green Belt;
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	<ul style="list-style-type: none"> • Lack of compliance and inconsistency of approach with reference to national Green Belt objectives; • Need to set out Cambridge's very special circumstances, which do not include provision of further housing; • Many objections stated that very special circumstances do not exist to require release of sites GB1, GB2, GB3 and GB4 from the Green Belt with associated impacts on the infrastructure and landscape quality of the local area; • Many objections required the use of brownfield land over use of Green Belt land for development; • Forecasting for number of homes is flawed; • Policy should be strengthened to ensure no loss of Green Belt land; • Need for policy to enhance the ecological value of the Green Belt.
Support	<ul style="list-style-type: none"> • Ready access from the city to the countryside is a key feature of Cambridge's attractiveness; • Support from a number of respondents that there is no compelling case for release of Green Belt land for the delivery of sub-regional facilities, particularly around the city's southern fringe; • Welcome the approach which involves no further incursions into the Green Belt at Trumpington and to the west of the city.

Minor Modifications suggested following Proposed Submission consultation and implications for Sustainability Appraisal

88. No changes to Policy 4: The Cambridge Green Belt or the supporting text are suggested in the Addendum to the Cambridge Local Plan 2014: Proposed Submission document. There are therefore no impacts on the findings of the Sustainability Appraisal.

Policy 5: Strategic Transport Infrastructure

EXISTING POLICY TO BE REPLACED (2006 CAMBRIDGE LOCAL PLAN)	OPTION(S) BEING TAKEN FORWARD FROM THE ISSUES AND OPTIONS REPORT (2012) AND ISSUES AND OPTIONS 2 (2013)	OPTION(S) NOT BEING TAKEN FORWARD FROM THE ISSUES AND OPTIONS REPORT (2012)
Not applicable	Not applicable	Not applicable

Key issues raised during Issues and Options (2012) and Issues and Options 2 (2013) consultations:

SECTION OF ISSUES AND OPTIONS REPORT (2012)	KEY ISSUES ARISING FROM CONSULTATION
Not applicable	Not applicable

No options related to strategic transport infrastructure were consulted on at the Issues and Options Stage. Policy 5 is a result of representations received to this consultation.

Evidence base:

- Cambridge City Council (2012). Cambridge Local Plan Towards 2031. Issues and Options Report (including representations to this document);
- Cambridge City Council (2013). Cambridge Local Plan Towards 2031. Issues and Options 2 (Part 1 and Part 2 Documents and representations to these documents).

How the policy came about:

89. A number of representations made to the Issues and Options (2012) consultation and the consultation on Issues and Options 2 (2013) called for the Council to ensure the areas in, on the edge and just outside Cambridge were thought about and planned for strategically with the County Council. This was particularly notable in Issues and Options 1, where paragraph 12.6 and 12.7 explained that the County Council were preparing a new Transport Strategy. Furthermore, a number of people expressed concern that transport impacts are felt 'citywide' and not just in the immediate vicinity of a new development.
90. As a result of these responses, and with the need for cooperation with the County Council in mind, it is considered that a policy within the local plan that supports any strategic transport schemes and infrastructure that comes about as a result of the emerging Transport Strategy for Cambridge and South Cambridgeshire, as well as the Local Transport Plan for Cambridgeshire. These transport schemes and infrastructure will be required and sought, often as a result of the added pressure on the network from the planned growth within the new local plan. It is appropriate, therefore, that the plan recognises this and lends support to the County Council strategies aimed at improving upon the current and future transport network.

Findings of the Sustainability Appraisal of the Cambridge Local Plan (May 2013)

91. With regards to transport emissions there are a number of policies that are relevant. Transport emissions, unlike emissions from other sources identified in the Scoping Report, have been rising nationally since the 1990s. In order to counter this and help achieve national targets, Policy 5 sets out the strategic vision for transport infrastructure in the city. It requires that, in line with the Cambridgeshire Local Transport Plan, development should achieve modal shift, i.e. a shift towards sustainable transport with greater priority given to pedestrians and cyclists.
92. Policy 5 (Strategic Transport Infrastructure) requires development proposals to be consistent with and contribute to the implementation of the Transport Strategies and priorities set out in the Cambridgeshire Local Transport Plan (LTP) and the Transport Strategy for Cambridge and South Cambridgeshire. The policy places an emphasis on securing a modal shift and increasing the use of more sustainable forms of transport, requiring developers to work with Cambridge City and Cambridgeshire County Councils to achieve the objectives and implement the Cambridge specific proposals in the LTP, including the implementation of transport schemes that will improve linkages across the region. This should help to ensure that new developments capitalise on opportunities identified in the LTP and in doing so help increase provision and use of more sustainable transport modes across Cambridge.

Key Issues raised during Proposed Submission consultation

Policy 5: Strategic Transport Infrastructure	
Total Representations: 42	
Object: 33	Support: 9
Objections	<ul style="list-style-type: none"> • Plan should create more footpaths and re-develop unused railway lines; • 20mph speed limit should not be implemented; • Transport in Cambridge is detrimental to local businesses; • Redevelop unused railway lines to improve access to the city; • Build on brownfield sites with sustainable transport access; • Build a computer transportation model illustrating the congestion effect of increased housing; • The bus station currently at Christ's Pieces should be moved to create a true multi-modal transport hub at Cambridge Railway Station with a dedicated route for public transport to the City Centre; • The Plan should state: <ul style="list-style-type: none"> ○ "programmes to develop public transport systems in the city will be implemented to bring the current (outdated) system up to the standard of an avant-garde European city with the dimensions of Cambridge." and how this will be achieved; and

	<ul style="list-style-type: none"> ○ "two commuting hubs for train-bus-coach will be established. A small hub in the central train station and larger one in the new station by the science park". ● Re-open Silver Street and Emmanuel Road to normal traffic to improve traffic flow; ● Replace lights at dysfunctional and congested junctions (e.g. Huntingdon Road/Histon Road/Victoria Road junction) by roundabouts. ● Policy wording should be strengthened; ● Need to add design standards suitable for historic environment and conservation areas; ● The transport infrastructure is integral to the effective implementation of spatial planning, yet it is difficult to detect where the Cambridge and South Cambridgeshire Transport Strategy permeates either the city or South Cambridgeshire plans; ● The problem of traffic congestion continues to threaten the success of Cambridge. If this problem persists or even worsens, then options for some form of demand management will be explored; ● There needs to be proper transport planning which specifically addresses major developments and social trends rather than very broad-brush estimates of demand and capacity; ● The approach needs to be less anti-car and simply seek to improve transport facilities for the benefit of residents and visitors, which may include making non-car modes better and hence more attractive; ● There is an absence of specific reference to public transport facilities provision in this policy to facilitate and increase its use by making interchange easier. Local interchange nodes such as now exists at Addenbrooke's would go a long way to achieving this; ● Deletion of policy 5, until the proposals have been fully included in the public consultation process. Not until such consultation has been fully conducted can the policy claim to be representative of the best interests of all stakeholders in the city; ● The plan must "require" greater pedestrian and cycle priority rather than merely "promoting" it. Otherwise, public funds will later have to be expended; ● The policy should place greater emphasis on new development proposals accessing and integrating with existing sustainable transport infrastructure to assist in reducing the impact of the development on the highway network; ● English Heritage objects to this policy because it conflicts with the NPPF and recommended alterations to avoid any misapprehension that - indirectly - all schemes in the draft
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	<p>Transport Strategy document are sanctioned;</p> <ul style="list-style-type: none"> • The policy objective to secure a modal shift will not be achieved with the proposed development strategy; • More explicit reference could be made to: <ul style="list-style-type: none"> ○ the role of rail and other public transport modes in the context of this policy in view of their continued importance to Cambridge; and ○ the movement of people between the city and other housing and employment centres in the wider area; • The council has not demonstrated 'an integrated approach' in the course of the local plan consultation as it failed to provide a strategic transport plan during the Issues and Options stage 1 or 2 consultation, which inevitably meant that residents were unable to properly assess the impact of more housing construction on the 'pressure' that the council admits is impacting upon the city's transport infrastructure; • The most sustainable and deliverable transport capacity in Cambridge is a completely unknown quantity. This position denies the opportunity to test and understand how to best manage the high level of trip movements of alternative community stadium sites. It denies the opportunity to undertake a sequential appraisal of this kind because the ability or otherwise to manage these trip movements would be a primary consideration in this context; • No evidence to establish the most sustainable and deliverable transport capacity within urban Cambridge and across the sub-region. Integrated development options have not been framed and tested taking this capacity into account; • Evidence demonstrates that the plan will not be effective in securing modal shift and the increased use of sustainable transport in accordance with NPPF policy; • No evidence that the city's transport infrastructure can accommodate the additional vehicles resulting from housing and employment growth. Growth will therefore lead to further congestion on the city's road network, with attendant increases in journey times and air pollution.
Support	<ul style="list-style-type: none"> • Support for pedestrian and cycle modes of transport, and other public transport modes, contributes to quality of life for the community by reducing congestion, improving air quality, promoting healthy lifestyles and mitigating climate change.

Minor Modifications suggested following Proposed Submission consultation and implications for Sustainability Appraisal

93. No changes to Policy 5: Strategic Transport Infrastructure or the supporting text are suggested in the Addendum to the Cambridge Local Plan 2014:

Proposed Submission document. There are therefore no impacts on the findings of the Sustainability Appraisal.

Policy 6: Hierarchy of centres and meeting retail needs

EXISTING POLICY TO BE REPLACED (2006 CAMBRIDGE LOCAL PLAN)	OPTION(S) BEING TAKEN FORWARD FROM THE ISSUES AND OPTIONS REPORT (2012) AND ISSUES AND OPTIONS 2 (2013)	OPTION(S) NOT BEING TAKEN FORWARD FROM THE ISSUES AND OPTIONS REPORT (2012)
Policy 6/7 Shopping Development and Change of Use in District and Local Centres	<ul style="list-style-type: none"> • Option 25 Maintain the current hierarchy of centres with new additions; and • Option 26 Change the position of some centres within the hierarchy 	Not applicable

Key issues raised during Issues and Options (2012) and Issues and Options 2 (2013) consultations:

SECTION OF ISSUES AND OPTIONS REPORT (2012)	KEY ISSUES ARISING FROM CONSULTATION
Option 25: Maintain the current hierarchy of centres with new additions	<ul style="list-style-type: none"> • Many support need for hierarchy, and many call for review to widen the scope for the Local Plan to identify additional retail centres; • A couple of larger retailers do not see the need to revisit the hierarchy; • The general need for a policy is supported by most.
Option 26: Change the position of some local centres within the hierarchy	<ul style="list-style-type: none"> • A couple of larger retailers do not see the need to revisit the hierarchy; • Objections tend to centre around fears that local and district centres / shops may lose protection; • The general need for a policy is supported by most.

Evidence base:

- Cambridge Retail and Leisure Study Update (2013)

How the policy came about:

Need for the policy

94. The National Planning Policy Framework requires that in drawing up Local Plans, local planning authorities should define a network and hierarchy of centres that is resilient to anticipated future economic changes. It also requires that planning policies should be positive, promote competitive town centre environments and set out policies for the management and growth of centres over the plan period.
95. Identifying a robust hierarchy of centres is important in applying the sequential approach which is set out in the National Planning Policy Framework. This requires that applications for main town centre uses should be located in town centres, then in edge of centre locations and only if suitable sites are not available should out of centre sites be considered. Different policies can also be developed to manage change in different types of centre within the hierarchy, as is the case in the current Local Plan (Policies 6/6 and 6/7), in order to promote vitality and viability.

Issues and Options Report

96. A survey of all the shops in Cambridge (including local centres, district centres, city centre and retail warehousing parks) was carried out by planning officers in the period November 2011 to July 2012, and this information was used to help identify any potential changes to the hierarchy, which were reflected in the options dealing with this matter in the Issues and Options Report (July 2012) (Options 25 and 26).
97. The main difference between Policy Options 25 and 26 was that Option 25 continues to protect all the centres identified currently and in the same position in the hierarchy. Whereas, Option 26 proposes to change the position of some of the centres within the hierarchy and potentially remove the local centre designation from some of the smaller centres. Both Options proposed additional centres within the hierarchy including Cambridge Leisure Park, and once developed new local centres at Clay Farm, NIAB site, the University of Cambridge's North West Cambridge site and potentially the Station Area. The centres identified for possible removal of their local centre status in Option 26 were centres with a small number of shops (6 or less) or where the shops were dispersed, for example along Victoria Road. However, this Option also cross referred to Option 138 in the Issues and Options Report, which suggested that there might be a need to protect individual or small groups of neighbourhood shops outside centres. Therefore if centres did lose their local centre status they could be potentially protected by such a policy (discussed further below).
98. In general there was support for some changes to the hierarchy to reflect changes that have taken place over time since the last Local Plan. In particular

there was support for the inclusion of the additional centres within the hierarchy, including those being planned in new developments. Although comments were made that there should be better connectivity between Cambridge Leisure Park and the station, perhaps by way of a new bridge. There was some support for Histon Road centre to be identified as a district centre.

99. There were comments that Option 25 (maintain the current hierarchy) is preferable to Option 26 from the point of view of existing businesses, and that the current hierarchy has been working reasonably well.
100. There was some support for the removal of the local centre designation from the smaller centres identified in Option 26, and that individual properties should have the flexibility to react to changing economic demands, thereby preventing properties standing empty where there is an alternative viable use. However, there were also objections to the removal of local centre status, as this provides protection to centres which are providing useful local facilities. In particular, there was concern about Green End Road and Grantchester Street losing their local centre status. Comments included that this would mean that local people would have to get into their cars and travel elsewhere, which is not in the public interest.
101. The National Planning Policy Framework considers that 'town centres' include city centres, town centres, district centres and local centres, but not small parades of shops of purely neighbourhood significance. However, it does not define what constitutes a District or Local Centre. One of the questions in the Issues and Options consultation asked 'what should be the definition of a local centre in Cambridge?'. Responses included that this should be a cluster of shops and other community facilities which satisfy local needs and are accessible on foot. Also that a wide range of shops is important.
102. As referred to above, Options 138 and 139 in the Issues and Options Report considered whether there needed to be a policy protecting neighbourhood shops outside of identified centres in the retail hierarchy or not. These shops often provide a useful function to local people, but they are not currently protected by policy.
103. This policy option is strongly related to Options 25 and 26 which relate to the hierarchy of centres. Option 26 seeks to potentially remove some of the smaller local centres, and if this Option was pursued then additional shops than presently would not have any protection. Alternatively, if it was decided to maintain all of the current local centres as designations, there is less need for an additional policy.
104. Comments on these options varied. Some wanted to protect local shops and services which are useful to the local community, and prevent opportunistic development. Others believed that market forces should determine which

businesses are viable and it is not the place of planning policy to potentially support unsustainable businesses, and that such a policy could result in vacant units.

105. The National Planning Policy Framework refers to town centres as the 'heart of their communities', and does not refer to shops or facilities outside of these locations. Therefore the approach which has been taken forward to policy development is that all of the existing local centres should be retained as designations and additional centres be designated, and none should be declassified. This approach will give renewed support to a wide network of centres, and as such it is not necessary to also protect those individual shops or small groups of shops outside these centres.

Interim Sustainability Appraisal

106. Options 25 and 26 were considered in the Interim Sustainability Appraisal. With regards to Option 25 (Maintain the current hierarchy of centres with new additions), the Sustainability Appraisal stated that 'This Option represents the business-as-usual scenario. It will continue to protect those identified town, district and local centres set out in the Cambridge Local Plan 2006 and will therefore have positive impacts on the economy and the city centre. However, it may be detrimental if it affords protection to inappropriate centres and prevents other legitimate uses. In general if the current approach to town centres is out of date and does not adequately protect emerging centres and at the same time offers protection to small and unviable local centres, then it is not functioning optimally in terms of sustainability'.
107. Option 26 (Change the position of some centres within the hierarchy with new additions) was preferable and the Sustainability Appraisal A stated 'Given the fact that this Option will be based on the most up to date information relating to current, emerging and small urban centres, it performs better than the previous Option. It should ensure that adequate protection is given to important old and emerging centres, while at the same time permitting other types of development in small and unviable local centres. This has a range of positive impacts that relate to communities and well-being and the economy'.

Evidence in Retail and Leisure Study Update

Hierarchy of Centres

108. The Cambridge Retail and Leisure Study Update (2013) looks at the retail hierarchy (in Chapter 5) and states that there has been relatively little change in the overall health and retail composition of the District and Local Centres since the previous Retail and Leisure Study in 2008. The centres generally perform well against the national average in terms of their convenience goods and service provision and, with only a few exceptions, the centres generally have a low vacancy rate.

109. The study recognises that the City Council was looking at the potential to remove or reclassify certain centres and in some cases to redefine the centre boundary reflecting changes since the Cambridge Local Plan 2006. The study therefore makes recommendations for each centre and the justification behind this. The study suggests that one option would be for the council to define a new tier of 'Neighbourhood Centres' to include the smaller centres which serve a more limited local catchment and perform more of a neighbourhood function. However, this change would be largely descriptive and in policy terms there would be little distinction in the approach taken to neighbourhood centres and local centres. The study goes on to say that irrespective of its definition, these centres should be protected to ensure that they continue to adequately meet the day-to-day needs of their immediate local catchment.
110. The study also assesses the potential for new centres to be defined in the emerging Local Plan. The study looks at the potential for the Cambridge Leisure Park to function as a centre, and concludes that whilst leisure is the main function there are other town centre uses which are useful to current local residents and future residents in the proposed housing developments which will be coming forward in the area over the Plan period. As such they consider that there would be some merit in protecting both the retail and leisure uses in this location over the plan period.
111. The study recommends that there is scope for the Station Area to become a local centre and Carlton Way and Hawthorn Way to be designated neighbourhood centres. Also for new local centres to be defined in major planned residential development at the NIAB site and University of Cambridge site and a neighbourhood centre at the Clay Farm site.
112. The assessment in the Retail and Leisure Study Update (2013) has been used to guide the changes to the hierarchy from the previous Cambridge Local Plan 2006.

Need for additional retail floorspace

113. The Retail and Leisure Study Update looks at the need for further convenience and comparison goods floorspace during the plan period to 2031. On the basis of current market shares and forecast growth in population and expenditure no capacity has been identified to support additional convenience floorspace in the City to 2031. This is largely as a result of existing commitments including the extension to the Sainsbury's store on Coldham's Lane, and the new convenience stores coming forward in North West Cambridge and the Southern Fringe. The study therefore recommends that there there is not any need to plan for or allocate sites to accommodate further additional convenience goods provision in the City beyond the convenience developments already planned.

114. With regards to comparison floorspace, the study states that on the basis of current market shares of the city centre and out-of-centre retail provision (an 80% retention rate of expenditure in the study area) and allowing for an inflow of 36% (based upon a in-centre survey carried out in 2008) and known commitments there is capacity to support approximately 3,820 sqm net additional comparison floorspace at 2017, increasing to 14,141 sqm net by 2022, to 31,226 sqm net by 2027 and to 39,976 sqm net by 2031.
115. The Study looks at other factors which could affect the level of capacity forecast for comparison floorspace. These include the potential effect other major planned developments in the area including retail developments at Peterborough and Huntingdon and the planned new town centre at Northstowe, which could potentially claw back a proportion of spend currently directed towards Cambridge. The consequence of wider developments could be to meet all available need in the City in the short – medium term. However, over the longer term there is still forecast capacity to support c.13,637 sqm net additional comparison goods floorspace by 2027, increasing to c.21,563 sqm net by 2031.
116. The forecasts have taken into account growth in Special Forms of Trading (SFT) (particularly internet spending) based upon levels set out by Experian (a firm specialising in retail forecasting rates). However, the Study points out that there is no certainty over this and in physically constrained places like Cambridge, retailers are more likely to maximise the use of the internet or generate new innovations in order to suppress demand for additional floorspace. As a result, the Study has also looked at a forecasting scenario where the proportion of spend on SFT is raised from 16% to 20% over the period 2022-2031. The results of both of these scenarios together reduces the need for comparison retail even further to 4,579 sqm net by 2027 and 12,444 sqm net by 2031. However, the Study is clear that given the inherent uncertainties in forecasting over such a long period of time, longer term forecasts should be treated with caution and updated at regular intervals during the plan period.
117. The Study recommends that for comparison goods, there is an element of uncertainty particularly given new developments coming forward in the wider area which will inevitably effect the capacity forecast for the City. As a result it is not considered feasible for the Council to plan to fully meet the capacity up to 2031, and it is recommended that the Council strategy should, in the first instance, be to focus on planning to meet the capacity identified up to 2022 (ie 14,141 sqm net²). As this capacity is sensitive to developments in the wider area, there will also need to be a degree of cooperation between Local

² For comparison the Grand Arcade is c.41,000 sq m gross, which at a net:gross ratio of 70%, gives c.28,700 sqm net, the Grafton is c.38,460 sq m gross, which at a net:gross ratio of 70%, gives c.26,922 sqm net.

Authorities and on-going monitoring to establish the extent to which some of the capacity identified may be met elsewhere.

118. At the top of the retail hierarchy the City Centre should be the primary focus to meet the identified capacity for additional comparison retail development up to 2022. The historic core is constrained in this respect and is unlikely to be capable of accommodating a substantial amount of additional comparison floorspace. However, the study recommends that there may be scope to accommodate some of the identified capacity in the Fitzroy/Burleigh Street area of the City Centre, and that this should be regarded as the first priority in sequential terms, and that the Council should adopt a pro-active approach in trying to bring this forward.
119. Other evidence for supporting the City Centre is found in the Retail and Leisure Study. The Study shows that whilst Cambridge City Centre is clearly the most dominant comparison shopping destination in the survey area, attracting an overall market share of 57%, this represents a marginal decline in market share (5%) since 2008. At the same time the retail warehousing off Newmarket Road has increased its market share from 15% in 2008 to 24% in 2012. This reinforces the need for the City Council to support the City Centre and maintain the complementary role of the out-of-centre retail warehousing and resist development here which would have the effect of creating direct competition with the City Centre.

Retail Impact Assessment Threshold

120. For out of centre applications for retail, leisure and office development, the National Planning Policy Framework provides a default threshold of 2,500 sq m gross, above which an impact assessment would have to be provided. The National Planning Policy Framework allows local authorities to set their own threshold based on local circumstances (paragraph 26).
121. The Retail and Leisure Study Update (2013) concludes that given the strength of the City Centre, there is not sufficient justification to support a lower locally-set threshold for retail above which an impact assessment will be required. It recognises that the role and function of the district and local centres is more reliant on convenience goods shopping and there might be a justification to adopt a lower threshold specifically for convenience goods. However, it then goes on to say that to maintain a degree of control over both convenience and comparison goods a policy should be developed which acknowledges that in normal circumstances retail development below the NPPF threshold would not normally require an impact assessment but there may be times that the council would require an assessment for proposals below this floorspace. This could be where there are concerns over cumulative impact and/or the role/health of nearby centres within the catchment of the proposal. Applicants should be encouraged to engage with the council on this matter at an early stage in the planning process.

122. This recommendation is reflected in the policy.

Issues and Options 2 Consultation

123. The Issues and Options 2 Consultation, Part 2 included potential changes to district and local centre boundaries. The City Council shopping survey showed that in some cases the boundaries of the district and local centres needed to be changed. In some instances, they could be extended logically to include other shops and facilities at the edge of the centre. In other cases, it was appropriate to remove some properties from the centres as they were residential at ground floor level and not centre uses. The surveys also identified potential new local centres at Carlton Way and Hawthorn Way, and the potential boundary of the Cambridge Leisure Park centre. Some other potential changes in the hierarchy have also been suggested, where the local centres at Arbury Court, Histon Road and Cherry Hinton High Street have been identified for possible reclassification as district centres.

124. Although only a small number of representations were received, these were generally in support of the changes proposed to the hierarchy and the boundaries proposed.

125. A comment was received that Mill Road should be considered as one centre and not split between Mill Road East and West. The centres have been historically treated as two centres because they are physically separated by the railway line. Policy 23 looks at the whole of Mill Road as an Opportunity Area. However, for the purposes of this policy, keeping the centres separate seems logical due to the physical separation and because it will give more control over change of use, as the two different parts of Mill Road have different characteristics.

126. There was some objection to the inclusion of Cambridge Leisure Park as a district centre, because the balance of uses is not typical of a district centre, with it mainly having a leisure function and there was concern that policies may restrict its functioning. However, there was also support because the shops and other facilities at/near the Leisure Park are a very important resource for the increasing numbers of people who live reasonably close to the Park, and the very many who pass this spot on foot or bicycle every day and they should be protected. It is proposed that the retail uses along the Hills Road frontage and the supermarkets on the Leisure Park should be designated as a Local Centre, which is distinct to the leisure uses which make up the rest of the Leisure Park, this could be renamed Hills Road/Cherry Hinton Road Local Centre.

127. There was also concern about the proposed boundary at Trumpington centre and that this should not be extended because the centre focuses on the crescent of shops. The extension proposed seems logical because it also

includes other important community facilities for local people such as the village hall, doctors surgery and a pub and would give these uses further protection. Another comment suggested that Waitrose should be included within the centre. Although Waitrose is considered edge of centre, it is not considered appropriate to provide additional protection for this use by including it within the local centre. If the foodstore was to relocate, due to the size of the site, another use such as housing may be more appropriate at this site rather than retail.

128. There was concern that the proposed extension to the district centre at No 1 Mitcham's Corner, would prejudice further development of the site for mixed use, but recognition that retail would be a suitable use on the frontage. It is proposed to maintain the extension to the centre proposed at Issues and Options 2, in order to recognise the council's desire that there be an active retail frontage. At this stage it would be too difficult to draw an alternative boundary on the map until planning permission has been granted for a use. However, the exact boundary can be refined in the next review of the Plan if development has taken place.
129. The final boundaries of the district, local and neighbourhood centres will be shown on the Local Plan Policies Map.

Conclusion

130. The hierarchy presented in the policy reflects the evidence in the Council's shopping survey, update to the Retail and Leisure Study Update (2013) and the consultation responses from the Issues and Options report (2012) and Issues and Options 2, Part 2 report (2013). The approach taken was to consolidate the network, by retaining all of the existing centres. Some of the centres have been moved between levels of the hierarchy and a new category has been added to the hierarchy, neighbourhood centres, to reflect the conclusions of the Retail and Leisure Study Update. In addition new centres have been proposed in areas developed since the 2006 Local Plan, at the Station Area and Hills Road / Cherry Hinton Road Local Centre. The policy also reflects the fact that there will be new centres in the urban extensions in the North West and Southern Fringe which will need to be recognised in the hierarchy once they have been developed.
131. The policy also addresses the need for additional retail floorspace and where this should be located and the Council's views on the sequential approach and retail impact assessment threshold based upon evidence in the Retail and Leisure Study Update.

Findings of the Sustainability Appraisal of the Cambridge Local Plan (July 2013)

132. Policy 6 sets out the capacity for 14,141m² of additional comparison retail floorspace to 2022. The policy is clear that this should be directed to centres in line with the sequential approach set out in the NPPF, and taking into account the hierarchy of centres³. The majority is to be delivered in the city centre (Policies 9, 10 and 11) but provision is also made for small scale retail at the Areas of Major Change and Opportunity Areas (Policies 13-26) in order to create mixed-use developments. Policy 11 the Fitzroy / Burleigh Street / Grafton Area of Major Change is the primary focus for providing additional comparison retail in the City Centre, redeveloping and/or expanding the site for retail and leisure use with residential and student accommodation on the upper floors.

133. The appraisal made the following recommendation regarding Policy 6:

The supporting text for Policy 6 could be strengthened to explain how monitoring of retail and leisure capacity will be managed in the period beyond 2022.

134. At paragraph 2.67, the supporting text to Policy 6 talks about the advice in the Retail and Leisure Study to plan to accommodate retail capacity to 2021 due to the uncertainty in forecasting. The paragraph talks about monitoring, but this could be explained further.

135. Propose additional text to the end of paragraph 2.6, so that it reads: ‘This will be subject to monitoring over the plan period, including the monitoring of retail developments in the wider area, which will inform when a review of the Retail and Leisure Study should be carried out.’

Key Issues raised during Proposed Submission consultation

Policy 6: Hierarchy of Centres and Retail Capacity	
Total Representations: 15	
Object: 10	Support: 5
Objections	<ul style="list-style-type: none"> • Add: and new centres coming forward for proposed sites at Bell School and GB1 Land north of Worts’ Causeway and GB2 Land south of Worts’ Causeway; • Sequential test must recognise operator requirements; • Impact assessments should not be arbitrarily applied; • Convenience capacity estimates are conservative; • Reduce the 14,141 number to prevent excessive development; • Why is Newmarket Road not listed at all, it houses by far the

³In Cambridge, the hierarchy is set out in Policy 6 and places the City Centre at the top of the hierarchy; then district centres; local centres; and finally neighbourhood centres.

	<p>biggest retailing in the city in terms of floorspace? Please do not build such a large development in the city again, it encourages car travel and has led to appalling congestion. Retail warehousing should be sited outside the city; this will not impact on the city centre which people visit for very different reasons;</p> <ul style="list-style-type: none"> • The threshold for the requirement for a retail impact assessment should be reduced in order to ensure that retail proposals outside of the City Centre do not adversely impact on the vitality and viability of the City Centre, 1,000sqm is suggested; • The council has identified a capacity to support up to 14,141sqm net of comparison goods floorspace between 2011 and 2022. The potential capacity for further retail floorspace beyond 2022 should be monitored and reviewed during the plan period; • Nearby developments should be required to 'support and enhance' existing local and neighbourhood centres; • New communities need identities to cohere and need services to live with any quality of life. We are of the opinion that not enough new centres have been identified in this policy or their possibility allowed for in policy 2. For example, the R10 Mill road depot, R9 Travis Perkins, and R12 Ridgeons sites could be ideal sites for mixed use, while maintaining high density housing provision. Currently they are proposed to be zoned residential. More importantly many large sites, further outside of town, zoned for 200+ houses have not been adequately provided for in terms of either nearby existing local centres (which would then need further encouragement and enhancement through policy) or through the provision of new local centres. With this policy we are of the opinion that temporary use changes and flexibility of use zones would allow for more reactive, creative and entrepreneurial development and use of space in the city; • The city's adopted retail growth scenario does not align with anticipated retailer demand and could serve to dilute the strong retail offer within the City Centre. It also risks harmful retail development coming forward outside the City Centre; • The focus for meeting this identified need implies that the Grafton Centre is the sequentially preferable location and it would appear to suggest that opportunities for selective and sensitive retail development within the Historic Core are of lesser importance. In addition, the numbering of the two locations within in the draft Policy also implies a hierarchy of delivery; • Opportunities for small scale additional retail development in the Historic Core, in addition to appropriate changes of use and the intensification and refurbishment for existing floorspace, should be sufficient to address the growing needs of the city, alongside a modest uplift in retail floorspace at the Grafton Centre;
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	<ul style="list-style-type: none"> • Trumpington Local Centre should be designated a District Centre and be expanded to include Waitrose; • There is no evidence that Cambridge City Council have had regard to our representations to earlier iterations of the local plan and such a failure is contrary to the relevant regulations; • The Beehive Centre should be identified as a District Centre within the Designated Retail Hierarchy; • Any reference to the council potentially seeking a retail impact assessment, at their discretion, "where a proposal could have a cumulative impact or an impact on the role or the health of nearby centres within the catchment area of the proposal" is appropriate. Not only is such vague wording clearly not "effective" it is not consistent with the requirement within the draft National Planning Practice Guidance for addressing different locally appropriate thresholds.
Support	<ul style="list-style-type: none"> • Support the need to protect the vitality and viability of local centres, both existing and new; • The proposal for an impact assessment on nearby shops and centres for any new retail provision greater than 2,500sqm (Paragraph 2.67) is welcome; • The retail capacity (Paragraph 2.65) makes no mention of any special measures to support small independent shops despite the fact that this was one of the suggestions arising from the council's workshop at Hughes College earlier in 2013; • The Market Square area is of such importance to the city that it warrants categorising as a centre in its own right; • The selection appears to reflect local needs; • X-Leisure (Cambridge II) Ltd has no objections to part of the Cambridge Leisure being identified as a local centre because it contains a mix of retail and leisure uses, which would be compatible with local centre designation in principle.

Minor Modifications suggested following Proposed Submission consultation and implications for Sustainability Appraisal

136. No changes to Policy 6: Hierarchy of centres and retail capacity or the supporting text are suggested in the Addendum to the Cambridge Local Plan 2014: Proposed Submission document. There are therefore no impacts on the findings of the Sustainability Appraisal.

Policy 7: The River Cam

EXISTING POLICY TO BE REPLACED (2006 CAMBRIDGE LOCAL PLAN)	OPTION(S) BEING TAKEN FORWARD FROM THE ISSUES AND OPTIONS REPORT (2012) AND ISSUES AND OPTIONS 2 (2013)	OPTION(S) NOT BEING TAKEN FORWARD FROM THE ISSUES AND OPTIONS REPORT (2012)
Policy 3/9 Watercourses and Other Bodies of Water	Option 23 Comprehensive policy for the River Cam Corridor	Not applicable

Key issues raised during Issues and Options (2012) and Issues and Options 2 (2013) consultations:

SECTION OF ISSUES AND OPTIONS REPORT (2012)	KEY ISSUES ARISING FROM CONSULTATION
Option 23: Comprehensive policy for the River Cam corridor	<ul style="list-style-type: none"> • Generally a very good level of support for the policy; • Support for a waterspace study; • The majority of the objections based on a concern about increased pressure on the river as a result of this policy.

Evidence base:

- Anglian River Basin Management Plan (2009);
- The Cambridge Landscape Character Assessment 2003;
- Cambridge City Council (2006). Cambridge Nature Conservation Strategy.

How the policy came about:

137. The Council has a duty to ensure that there is improvement to water body quality through its policies and actions, including planning. When considered in the context of the Anglian River Basin Management Plan (2009) and the Water Framework Directive (2000), the status of the water body quality in Cambridge currently varies from 'poor' to 'moderate' across a number of water bodies and groundwater supplies including the Cam and Ely Ouse Chalk. The city's water bodies have not achieved 'good' status as a result of canalisation, with a loss of their natural characteristics, and the flow of untreated surface water runoff into the watercourses and the River Cam.

138. Only one option was put forward for policy development because the Council has a statutory duty to have regard to the Water Framework Directive and the associated Anglian River Basin Management Plan. The National Planning Policy Framework is clear that the planning system should contribute to and enhance the natural and local environment.

139. This option attracted strong support at the Issues and Options consultation, with most responders recognising that the Cam corridor is an important and distinctive place in Cambridge that requires an individual policy.
140. The Cambridge Landscape Character Assessment 2003 was adopted in January 2003 as a material planning consideration. It recognises that the River Cam and its tributaries represent one of the most important natural features in Cambridge. The Cam flows through Cambridge from south-west to the north-east in a loop which encloses the city centre. The unifying element is the watercourse and the associated water meadows and flood plain which are, by and large, relatively undeveloped because they are damp and low-lying.
141. As the river flows through the city it passes through different landscapes, commons and open spaces, 'The Backs', and residential development on Riverside as well as development such as the college boathouses. The following character types and areas associated with the rivers and streams are identified.
- Open rural comprising of shallow valley landscape; ancient hedgerows, veteran trees including pollard willow and important habitat including riverbank and associated flood meadows; and views over the water meadows, across the floodplain and to the river, especially where it is lined with willows.
 - Commons comprising of character of individual commons; open areas linking green space right through the city; and views across the meadows to the river and beyond to other commons.
 - Urban edge comprising boat yards and associations with the 'bumps' and other river based activities; built form that closely associates with the river and from which there are fine views of the river; industrial process associated with the river including the industrial buildings and warehouses, locks and bridges; and pocket landscapes.
 - College Backs comprising meadows and gardens; tree avenues; views across meadows to colleges; walks; and semi-public space, a space which is not owned by the community but brings significant public realm benefits through landscape enhancement, views and or access.
142. It recognises that there are pressures on the Cam from new development, tourism, boat moorings, and recreational activities. This policy seeks to address these pressures.
143. Cambridge is a target area with the Cambridgeshire Green Infrastructure Study 2011 and also recognises that the rural hinterland is especially close to the west of the city, although nowhere in Cambridge is very far from the countryside or the green corridors that run into the city. The green spaces strongly define and encircle the central area, allowing the historic core of Cambridge to be seen across open ground. The transition between the relative peace and space of the open space and the bustle and intimacy of the densely packed city streets is very marked. These qualities are fragile, finite and

irreplaceable, and should be safeguarded. This policy seeks to safeguard the largest of these green corridors.

144. The Cambridge Nature Conservation Strategy, adopted in 2006, provides a technical document to guide the nature conservation activities of all departments and partners across the city of Cambridge. The vision is that over 10 years (2006 to 2016) Cambridge will see a “net gain” in biodiversity, both within the city and its immediate hinterland. Wildlife will be protected, enhanced and where possible expanded and linked. Everyone who lives or works in Cambridge will have access to high quality natural green spaces within walking distance of their home or place of work, and there will be a greater awareness and understanding of biodiversity.

145. Within the strategy, a number of actions and projects have been proposed which includes:

- The favourable management of County and City Wildlife Sites.
- Restoration of Cambridge Commons and floodplain.
- Enhanced biodiversity management of public parks and open spaces.
- Improved public access to, interpretation and promotion of Cambridge’s natural Green Spaces.

It recognises that the Cam forms the major green corridor through the city and helps define the character of the city.

Findings of the Sustainability Appraisal of the Cambridge Local Plan (July 2013)

146. The Scoping Report highlights that tourism makes a significant contribution to the local economy; however the current Local Plan has a policy of ‘managing rather than promoting’ tourism. In order to promote the sustainable growth of tourism, policies allow for the development and expansion of high quality hotels in sustainable locations (Policy 77); prohibit the loss of hotels and accommodation along public transport corridors (unless no longer viable – Policy 78); and support proposals for new visitor attractions (Policy 79) providing that they complement the existing cultural heritage of the city and are limited in scale. Policy 7 requires development proposals along the River Cam corridor to take account of and support as appropriate tourism and recreational facilities. These approaches should reduce strain on the public transport network and attractions by reducing the number of day trips and diversifying the tourist ‘offer’ of the city; although it is noted that this approach is aspirational and may result in a ‘mini-break’ culture through greater hotel accommodation provision. Other policies seek to preserve the character of Cambridge (a key attraction to tourists) and as such the plan should lead to significant positive effects in terms of promoting the sustainable growth of tourism.

147. Policy 7 (The River Cam) aims to ensure that the special character of the River Cam and its corridor is protected. Its requirement for the design of development proposals to “enhance views to and from the river” should help maintain the quality and distinctiveness of the Cam’s landscape character.
148. Policy 7 is likely to lead to positive effects as it seeks to where possible raise the quality of open spaces adjacent to the River Cam.

Key Issues raised during Proposed Submission consultation

Policy 7: The River Cam	
Total Representations: 25	
Object: 13	Support: 12
Objections	<ul style="list-style-type: none"> • Need for a strategic plan for the river; • Policy should be strengthened to prohibit development which would worsen conditions and views; • The river is poorly managed and polluted; • More housing development will put pressure on the river; • Residential moorings should be restricted or removed from the river altogether; • Qualifying criteria in the policy with “where possible” weakens the policy; • Caution is needed in managing tourism as it may ruin the river; • Concern over lack of control over moorings below Jesus Lock; • Concern over allocation of site RM1 Fen Road for a marina; • Need for more coverage of the historic and cultural importance of the river through a Historic Environment Strategy coupled with review of the effectiveness of existing conservation area appraisals; • Reference should be made to employment related to the river, e.g. chandlery; • Add a summary sentence at the start of the policy itself along the lines: The River Cam is a unique, irreplaceable and geographically limited public asset, and neither water surface or river bank should be surrendered to exclusive private use except in the most exceptional circumstances; • English Heritage object to criterion (d) on the basis that the re-naturalisation of the river is not appropriate in many central areas of the city, e.g. The Backs; • Reword criterion (e) as follows: Protect the intrinsic value of the river Cam water surface and river bank as tranquil places for the public to enjoy, and enable, where possible, opportunities for greater public access and amenity; • Reword criterion (f) as follows: Take account of and support, and where possible enhance, the tourism and recreational opportunities and facilities associated with the river;

	<ul style="list-style-type: none"> • Add a criterion prohibiting further permanent residential moorings on the river bank, other than designated offline marinas; • English Heritage suggest reordering the supporting text to highlight the importance of the historic environment; • Reference to the camToo project is needed in the supporting text; • The supporting text could be strengthened through specifically identifying the River Cam and its associated floodplain habitats and tributaries as an ecological network requiring enhancement, in line with paragraph 117 of the NPPF. • Paragraph 2.69, which gives an unduly rosy view of the wildlife status of the river, should be amended. The second sentence should be altered to read: Although the river is almost entirely modified by human action, and its wildlife value severely depleted by river works and the effects of draining and raising the level of the riverside commons, nevertheless it supports a healthy population of fish and their predators, including otters and kingfishers.
Support	<ul style="list-style-type: none"> • Environment Agency supports the recognition of the River Cam as a key defining part of Cambridge; it has a vital but finely balanced functional role to convey flood water, be a habitat for aquatic species, and a green corridor for recreation and biodiversity that links with other key habitats beyond the city; and the need to naturalise the Cam given its legacy of modifications that have not always promoted a natural and healthy river system. We advise that this is a crucial part of Cambridge fulfilling the Water Framework Directive and the Anglian River Basin Management Plan; • General support; • Specific support for reference to the river as an integral, defining feature of the setting of the city and a wildlife resource; conservation of natural river features; and for assessment of the impact of development on views of the river.

Minor Modifications suggested following Proposed Submission consultation and implications for Sustainability Appraisal

149. No changes to Policy 7: The River Cam or the supporting text are suggested in the Addendum to the Cambridge Local Plan 2014: Proposed Submission document. There are therefore no impacts on the findings of the Sustainability Appraisal.

Policy 8: Setting of the City

EXISTING POLICY TO BE REPLACED (2006 CAMBRIDGE LOCAL PLAN)	OPTION(S) BEING TAKEN FORWARD FROM THE ISSUES AND OPTIONS REPORT (2012) AND ISSUES AND OPTIONS 2 (2013)	OPTION(S) NOT BEING TAKEN FORWARD FROM THE ISSUES AND OPTIONS REPORT (2012)
Policy 3/2 Setting of the city	Option 21 Setting of the city; Option 82 Support for strategic biodiversity enhancement proposals	Not applicable

Key issues raised during Issues and Options (2012) and Issues and Options 2 (2013) consultations:

SECTION OF ISSUES AND OPTIONS REPORT (2012)	KEY ISSUES ARISING FROM CONSULTATION
Option 21: Setting of the city	<ul style="list-style-type: none"> Green Belt and '5 green corridors' are key to preserving the setting of the city; Needs to be a clear distinction between green corridors, Green Belt and the 'urban edge'; Care needs to be taken with development on the edge of the city, to protect the Green Belt; Some question the deliverability and whether it will work as intended.
Option 82: Support for strategic biodiversity enhancement proposals	<ul style="list-style-type: none"> This option is essential to support the creation of a viable and functioning ecological network across the city to deliver the Green Infrastructure Objectives; Large sites need to have this assessment; The 2011 Green Infrastructure Strategy will provide a useful starting point for the identification of proposals.
NEW OPTIONS ARISING FOLLOWING COMMUNITY INVOLVEMENT	
No additional options have been suggested.	

Evidence base:

- Cambridge City Council (2002): Inner Green Belt Boundary Study 2002;
- LDA (2002): Cambridge Green Belt Study;
- Cambridge City Council (May 2012): Inner Green Belt Appraisal;
- Cambridge City Council (December 2012): Inner Green Belt Boundary Study.

How the policy came about:

150. A number of studies have considered the setting of the city and the features that are considered to be critical to this setting. These include:
- Cambridge City Council (2002): Inner Green Belt Boundary Study 2002;
 - LDA (2002): Cambridge Green Belt Study;
 - The 2003 Cambridge Landscape Character Assessment;
 - Cambridge City Council (May 2012): Inner Green Belt Appraisal; and
 - Cambridge City Council (December 2012): Inner Green Belt Boundary Study.
151. These studies have all identified the importance of the interface between the urban edge and the countryside to the setting and special character of Cambridge. Development on the urban edge of Cambridge therefore has the potential to detrimentally affect the setting of the city. The findings of these studies have been upheld at a number of examinations, including the examination of the Cambridge Local Plan 2006 and the Cambridgeshire Minerals and Waste Site Specific Allocations examination in 2011.
152. This policy approach seeks to ensure that development conserves and enhances the setting of the city. The promotion of high quality development, of an appropriate scale, that responds positively to context is in line with the National Planning Policy Framework. The National Planning Policy Framework states that development that fails to take the opportunities available for improving the character and quality of an area and the way it functions should be refused.
153. Some respondents to the Issues and Options consultation questioned the deliverability of this approach. However, it is considered that this policy presents the best opportunity to conserve, enhance and improve the setting of the city. The Interim Sustainability Appraisal of the Issues and Options Report (2012) noted that such a policy should have a positive effect in ensuring that new developments on the edge of the city do not adversely impact biodiversity, and maintain connectivity between existing green infrastructure. This is because the option is likely to protect the green fingers of countryside that into the city the river.
154. Promoting access to the surrounding countryside will also have positive health and well being benefits. Health and wellbeing as they relate to the environment are now well documented and every opportunity of enhancing links to the countryside in and around the city should be taken.
155. Taking the opportunity to conserve and enhance the edge of Cambridge should help maintain the setting of the city while still providing support for appropriate development. This is likely to have a positive effect on landscape, townscape and cultural heritage as the option seeks to conserve and enhance landscape setting and special character. Such a policy may also help to maintain Cambridge as a compact city with a clear distinction between the

urban area and the countryside, which is key to the distinctiveness of Cambridge.

156. Following consultation on the Issues and Options Report, it was decided to include a reference to the promotion of green infrastructure and biodiversity enhancement within the setting of the city policy. This was originally consulted on as a separate policy option in the Issues and Options Report (option 82). However, it is considered that the objective of improving habitat connectivity both within and outside of Cambridge, helping to create a stronger ecological network could be achieved by including a reference to the delivery of large scale strategic biodiversity enhancement projects at a landscape scale within the setting of the city policy. Such an approach is in keeping with the requirements of the National Planning Policy Framework, which requires planning policies to plan for biodiversity at a landscape scale across local authority boundaries, promoting the preservation, restoration and re-creation of priority habitats, ecological networks and the protection and recover of priority species.
157. With regards to the mapping of strategic biodiversity enhancement projects, this process has already taken place as part of the Cambridgeshire Green Infrastructure Strategy, which forms a background document to the Local Plan Review. The Council will continue to work with partners including the Wildlife Trust, South Cambridgeshire District Council and Cambridgeshire County Council to implement projects identified in this study as appropriate.

Findings of the Sustainability Appraisal of the Cambridge Local Plan (July 2013)

158. Policy 8 (Setting of the City) seeks to ensure that the area between the urban edge and the countryside is protected from inappropriate development. The policy will only allow planning permission to be granted for development proposals on the urban edge where it can demonstrate that it “responds to, conserves and enhances the landscape setting, approaches and special character of the city”.
159. Policy 8 promotes access to the countryside or open space from development on the urban edge and calls for landscape improvements, with likely positive effects.
160. Policy 8 requires development proposals on the urban edge, within green corridors, green belt and open space to conserve and enhance landscape setting, promote access to the countryside / open space where appropriate, and include landscape improvement proposals that improve visual amenity and enhance biodiversity.
161. The appraisal made the following recommendation regarding Policy 8:

Increased consideration of the role that new or existing green space can play as part of the wider ecological network of the city, including as green infrastructure (promoting the Cambridgeshire Green Infrastructure Strategy).

162. Policy 8 already states that development on the urban edge will only be supported where it enhances biodiversity and particular reference is made to supporting proposals for landscape scale enhancement and the conservation or enhancement of biodiversity.
163. Other policies in the Plan also seek to enhance biodiversity and linkages in the ecological network (Policies 67, 69 and 70). Also, Policy 7 looks at the enhancement of natural resources and renaturalisation of the River Cam.
164. No change was made to the plan.

Key Issues raised during Proposed Submission consultation

Policy 8: Setting of the city	
Total Representations: 24	
Object: 13	Support: 11
Objections	<ul style="list-style-type: none"> • CEG objects to the policy’s reliance on earlier Green Belt assessments cited. Methodology used in these studies was flawed and the resulting conclusions were incorrect. Policy should be reworded to provide for the objective assessments of effects on a site by site basis; • Pigeon Land objects to criterion (a) of the policy as it is unduly protective, restricts development, prevents the city meeting its objectively assessed need for homes and jobs. It is not compliant with the NPPF; • Natural England considers that, without a criteria based policy relating to the protection and enhancement of soils, the plan is not consistent with national policy and therefore unsound; • Natural England considers that the plan should include an overarching green infrastructure policy; • English Heritage requests the inclusion of a commitment to the preparation of a historic environment strategy for the city as a whole that encompasses, builds on, and updates, current studies; • Development proposed at sites GB1 Land north of Worts’ Causeway and GB2 Land south of Worts’ Causeway do not conserve biodiversity or the setting of the city and should be deleted from the plan; • Policy implies that sites will be judged on their merits according to the degree to which they conserve the setting of the city and achieve increased public access. If this would only apply to non-Green Belt land, then this would need to be more explicitly worded;

	<ul style="list-style-type: none"> • Biodiversity could be increased by replacing monoculture arable land with parks and reserves; • Policy needs strengthening with need for an unambiguous statement of presumption against development on the urban edge; • Need for the preparation of an updated Green Belt Study and updated Landscape Character Assessment; • English Heritage requests the amendment of paragraph 2.73 to refer to wider considerations of setting, particularly the Cambridge skyline and views.
Support	<ul style="list-style-type: none"> • Necessary to place limits on developments on the edge of the city to preserve the benefits of the remaining Green Belt and green corridors into the city, particularly in the west of Cambridge; • Support for biodiversity protection and enhancement; • Need for High Level Stewardship of existing agricultural land to allow access and improved habitat whilst allowing farming to continue effectively.

Minor Modifications suggested following Proposed Submission consultation and implications for Sustainability Appraisal

165. No changes to Policy 8: Setting of the city or the supporting text are suggested in the Addendum to the Cambridge Local Plan 2014: Proposed Submission document. There are therefore no impacts on the findings of the Sustainability Appraisal.

AUDIT TRAIL: SECTION 3: CITY CENTRE, AREAS OF MAJOR CHANGE, OPPORTUNITY AREAS AND SITE SPECIFIC PROPOSALS

Note, for the audit trails for individual site allocations within the city centre, areas of major change, opportunity areas and site specific proposals, please see the section of the audit trail covering Appendix B: Proposals Schedule within Appendix 3 of the Statement of Consultation.

Policy 9: The City Centre

EXISTING POLICY TO BE REPLACED (CAMBRIDGE LOCAL PLAN 2006)	OPTION(S) BEING TAKEN FORWARD FROM THE ISSUES AND OPTIONS REPORT (2012) AND ISSUES AND OPTIONS 2 (2013)	OPTION(S) NOT BEING TAKEN FORWARD FROM THE ISSUES AND OPTIONS REPORT (2012)
Policy 6/6 Change of Use in the City Centre	Option 24 City Centre	Not applicable

Key issues raised during Issues and Options (2012) and Issues and Options 2 (2013) consultations:

SECTION OF THE ISSUES AND OPTIONS REPORT (2012)	KEY ISSUES ARISING FROM CONSULTATION
Option 24: City Centre	<ul style="list-style-type: none"> • City Centre capacity (or lack of) is a reoccurring theme – no space for development; • Must maintain the historic centre; • Difficult to advance the City Centre in terms of number of people and commercial interest etc. without impacting its beauty and historical importance; • Some support from Colleges for policy; • Many concerns about Park, Bridge and Magdalene Streets. • Some support for Market Square and Peas Hill suggestions. • Too many buses in City Centre – some responses suggest banning them altogether. • Less chain shops, more variety is cited as a desire by numerous respondents. • Any changes need considerable consultation with public.
NEW OPTIONS ARISING FOLLOWING COMMUNITY INVOLVEMENT	
No new options were suggested.	

Evidence base:

- Arup (2013). Cambridge City Centre Capacity Study
- GVA (2013) Cambridge Retail and Leisure Study Update

How the policy came about:

Need for the policy

1. The National Planning Policy Framework requires that in drawing up Local Plans, local planning authorities should recognise town centres as the heart of their communities and pursue policies to support their vitality and viability. Policy 6 defines the hierarchy of centres in Cambridge and this policy focuses on the City Centre which is at the top of the hierarchy. Policy 10 then goes on to look more specifically at development and change of use in the Primary Shopping Area in the City Centre.
2. The Cambridge Local Plan 2006 identified 'a thriving and accessible historic core' as one of the main components of the spatial strategy. This is still the case, and this policy recognises the importance of the City Centre. It sets out a number of high level criteria against which proposals for development and redevelopment will be assessed and identifies opportunity areas within and at the edge of the City Centre. More detail about these areas is provided in other policies in the Plan.
3. The policy also focuses on how new development should contribute to improving the public realm in Cambridge. The National Planning Policy Framework is clear about the importance of good design and townscape which responds to local character and history and establishes a strong sense of place.

Issues and Options Report

4. The Issues and Options Report included Option 24 relating to the City Centre. The supporting text to this Option set out the strengths and weaknesses of the City Centre and at paragraph 4.36 some potential ideas for possible development / redevelopment in the City Centre. Reference was also made to the fact that the City Council would be looking further into the capacity of the City Centre. Consultants were commissioned to undertake a study, and the results of this are set out below.
5. A large number of representations were received in relation to Option 24 on the City Centre. A summary of these is provided below:
 - Lot of support for a policy on the City Centre.
 - Historic character must be protected.
 - Manage the demand before the City Centre loses its qualities and attractiveness.

- Plan for more Local Centres rather than the City Centre.
- Don't want a clone of other City Centres.
- An increase in people and businesses and maintaining the quality and attractiveness of the place is incompatible.
- Look at street signage clutter, particularly pedestrian zone signs.
- University and Colleges should be fully involved in the study as primary landowners.
- Reverse the clone town effect by supporting independent retailers and reduced rents for independent retailers.
- There should be an affordable shop quota for all retail areas as recommended in Portas Report.
- Investigate use of low cost air quality measures such as moving bus services to biomethane (like Malmo in Sweden).
- There should be selective retail development with supermarkets, built on the periphery to reduce inward trip making.
- Strong support for improvements to the public realm – consistency of design and paving.
- Large number of buses in the City Centre is a hazard to pedestrians and cyclists.
- The uncertain future for retail in terms of increased internet shopping is another factor to be considered.
- Mixed views on use of market square as flexible space.
- Lack of free of charge public toilet facilities.
- Some support for use of Peas Hill for market, but some find this area useful for dropping off/ pick up – especially for students living nearby.
- Generally support for keeping Park St as a car park.
- Support for improving Hobson Street and Hobson's passage.
- Broad support for leaving Council offices in Guildhall.
- Lots of comments about Love Cambridge and the proposed BID, saying that it is a tax and that most of the financial contribution will be from big businesses with their focus.
- Support for a policy maintaining and enhancing the City Centre.
- There is a need for a policy on overcrowding of the City Centre as it will become more so if the number of jobs and houses is increased further.
- Need for a policy and a masterplan with a clear vision for any opportunities e.g. Mill Lane space.
- Need useful shops in centre, not just fashion – market is good in this respect.
- Many people feel the capacity has nearly been reached or has already been reached.
- Need to consider the negative impact of tourism.
- Better quality design which reflects Cambridge's character – the Grand Arcade could be anywhere.
- Need further cycle park expansion – Grand Arcade is usually full.
- Encourage independent retailers – reduced business rates, support for start-ups.

- Keep rents low on properties that the City Council owns, like the market.
 - Properly pedestrianise the centre.
 - Make it more accessible in the evening – open bollards, cheaper parking, smaller eco shuttle buses from Park and Ride.
 - Restrict access by bus and close Drummer St bus station. Coach park at one of the Park and Ride sites.
 - Outdoor City Centre culture in the Summer if market place opened up.
 - Plant some trees and more benches.
 - Ideas in para 4.36 generally thought to be good.
 - Support for free low emission shuttle buses in the City Centre (eg like Badger bus in Bath).
 - Water taxi service from Fen Ditton, Chesterton to Jesus Green for shoppers in the summer (eg like Spalding).
6. Generally there is support for maintaining the City Centre as the focus for a mix of uses, but with suggestions as to how best manage the limited space without compromising the important historic environment which makes the City Centre so special.

Interim Sustainability Appraisal

7. The Interim Sustainability Appraisal stated that ‘the overall aim of this Option is to maintain and enhance the viability and vitality of the City Centre and improve the public realm. This will clearly have a range of positive impacts. However, given the competing use for the City Centre some uses will inevitably be preferred over others and there will be trade-offs. Without knowing the priority uses for the City Centre and how competing uses would be assessed it is difficult to assess the sustainability of this option’.

Evidence in Cambridge City Centre Capacity Study

8. The Cambridge City Centre Capacity Study (2013) was produced by consultants Arup. It looks at the current uses and functionality of the City Centre, the growth of the City during the Plan period and how this might affect the City Centre. Also, how the capacity of the City Centre could be increased, through the identification of development sites and alternative management of uses to free up capacity.
9. The study shows the large number of competing uses in the City Centre and the constraints to growth from open spaces, University and College land ownership and historic buildings. There are few opportunities from Council owned property and redevelopment of car parks and a limited number of vacant properties. However, there is a need for retail, leisure, offices, student accommodation, hotels and housing.
10. The study looks at the sites identified in evidence based studies produced for the City Council and the sites identified by the City Council at Issues and

Options 2 consultation. It also makes an assessment of development opportunities on a street by street basis in the City Centre. The study identifies six areas of potential change, in or at the edge of the City Centre. It sets out existing conditions, known plans for the area and opportunities for future development for each. These areas include:

- Mill Road
 - Old Press / Mill Lane
 - Regent Street / Hills Road / Station Road
 - Castle Street / Magdalene Street
 - East Road / Grafton / Fitzroy Street / Burleigh Street
 - Market Square / Guildhall / New Museums
11. The potential for development in these areas is recognised in the Local Plan through the Fitzroy / Burleigh Street / Grafton Area of Major Change and Opportunity Area policies for Mill Road, Old Press / Mill Lane, Eastern Gate, Cambridge Railway Station, Hills Road Corridor to the City Centre. The potential improvements to the Market Square is recognised in the policy on the City Centre. The potential for enhancing the visitor experience as part of a tourism loop running between King's Parade, Silver Street, and along the Backs to the Folk Museum and Kettles Yard and then back over Magdalene Bridge, Bridge Street and through the City Centre is recognised in Policy 79 - Visitor attractions.
 12. The study looks at potential transport and public realm improvements that will help to increase capacity in the City Centre. The study recognises that sustainable modes of transport are key in the City Centre. It does not recommend that pedestrians are segregated from cyclists because shared space is often safer, as cyclists will tend to go slower. It also recognises the need for further cycle parking facilities in the City Centre. With regards to bus services the study agrees that City Centre bus services should continue to be routed through the City Centre, to provide easy accessibility. However, it recognises the capacity problems of Drummer Street bus station and suggests that opportunities for other hub facilities could be considered such as at a redeveloped Grafton Centre, and if feasible the railway station.
 13. The study states that a public realm strategy will ensure a clear vision for the City Centre, with a strategic goal of creating a high quality, safe and accessible urban environment. It will be key in promoting sustainable modes of transport and ensuring that there is a consistent and coherent approach to street furniture, lighting, tree planting and material palettes. This approach has been taken forward into the policy on the City Centre which recommends the production of a Public Realm Strategy Supplementary Planning Document.
 14. The study makes recommendations on the extent of the City Centre boundary and the Primary Shopping Area, which have been taken into account in the drawing of these boundaries on the Policies Map. The study recommends that

no change needs to be made to the City Centre boundary which is shown on the 2006 Local Plan Proposals Map. This is because it follows a logical boundary along roads and the river, and although there are hubs of activity developing outside the City Centre, such as around the station and at the retail parks on Newmarket Road, they lack a physical coherence with the main centre. The Council agrees with this assessment and no change is proposed to the City Centre boundary.

Issues and Options 2 Consultation

15. There was no consultation on the city centre boundary or primary shopping area boundary at Issues and Options 2 stage, because the evidence from two key studies was being awaited - the Cambridge Retail and Leisure Study Update and Cambridge City Centre Capacity Study.

Findings of the Sustainability Appraisal of the Cambridge Local Plan (July 2013)

16. The appraisal notes that the plan should lead to significant positive effects in terms of encouraging economic growth through capitalising on the four strengths of Cambridge's economy, which includes retail. The appraisal highlights that retail growth should increase the city's attractiveness to shoppers and visitors. In requiring new development in the city centre to "preserve or enhance heritage assets and their setting, green spaces and the River Cam", this policy should have positive effects in terms of landscape, townscape and cultural heritage objectives. Requirements within the policy for development to help promote sustainable modes of transport should also have a positive effect on reducing private car use.
17. The Appraisal did make a recommendation that the policy could perhaps go further in terms of explicitly requiring that development proposals in the city centre take into account and reflect needs associated with the local community. However, it is considered that this is dealt with within Policy 10 (Development in the City Centre Primary Shopping Area), which talks about the use of the upper floors of units for residential, student accommodation, offices and community facilities, which will be of benefit for the local community and potentially increase the residential community in the City Centre. Given that the plan should be read as a whole, it is not considered necessary to duplicate the requirements of Policy 10 within this policy.

Key Issues raised during Proposed Submission consultation

Policy 9: The City Centre	
Total Representations: 12	
Object: 4	Support: 8
Objections	<ul style="list-style-type: none"> • Policy needs to acknowledge that the city’s retail offer is increasingly biased towards a narrow market sector – the needs of older residents need to be met along with the need to increase the middle price range sector; • It is not clear what is meant by heritage assets in this policy – clarification should be provided; • Critical to learn from previous attempts to improve the market square and ensure that the council works with other partners such as the BID and potentially City Deal to develop a shared vision with the market holders; • The policy does not set out any means by which to specifically assess the impact on the night time economy on uses of a residential nature in the city centre (such as Colleges). A new criterion should be added to the policy; • More needs to be added to the policy to improve provision for disabled people.
Support	<ul style="list-style-type: none"> • Full support as the city centre is shockingly neglected in terms of public realm, streetscape, provision of seats, etc; • In seeking to ensure that the city centre is the main focus for retail and other town centre uses the policy is in accordance with the NPPF. Particularly support the identification of the Fitzroy/Burleigh/Grafton area as the main focus for new comparison retail floorspace; • The area around the market square is crucial and the SPD should focus on making this a far more accessible and attractive public space for use in the evening as well as shopping hours; • Strong support for the development of a public realm strategy for the city centre – a focus on improving connections between the Historic Core and the Fitzroy/Burleigh Street/Grafton Area will be key in lessening the potential impacts of the Grafton Centre redevelopment through encouraging linked trips.

Minor Modifications suggested following Proposed Submission consultation and implications for Sustainability Appraisal

18. No changes to Policy 9: The City Centre or the supporting text are suggested in the Addendum to the Cambridge Local Plan 2014: Proposed Submission document. There are therefore no impacts on the findings of the Sustainability Appraisal.

Policy 10: Development in the City Centre Primary Shopping Area

EXISTING POLICY TO BE REPLACED (CAMBRIDGE LOCAL PLAN 2006)	OPTION(S) BEING TAKEN FORWARD FROM THE ISSUES AND OPTIONS REPORT (2012) AND ISSUES AND OPTIONS 2 (2013)	OPTION(S) NOT BEING TAKEN FORWARD FROM THE ISSUES AND OPTIONS REPORT (2012)
Policy 6/6 Change of Use in the City Centre	Option 137 Separate policy options for different types of centre	Option 136 General shopping policy that applies to all centres

Key issues raised during Issues and Options (2012) and Issues and Options 2 (2013) consultations:

SECTION OF THE ISSUES AND OPTIONS REPORT (2012)	KEY ISSUES ARISING FROM CONSULTATION
Option 136: General shopping policy that applies to all centres	<ul style="list-style-type: none"> • A number of objections to Option 136 which proposes a general policy for all centres. Preference for Option 137, which separates criteria for different types of centre, as different centres perform different roles and functions in the retail hierarchy; • Objection to larger retail developments providing smaller units. This would be an unnecessary restriction on development. Not in line with NPPF; • The growth of internet shopping is likely to reduce use of retail outlets in the city and reduce the need for increasing retail jobs; • There should be no loss of shops without justification; There is a need for economic vitality in all parts of the city, not just the City Centre; • The city requires more and smaller local shops outside the City Centre; • Economic downturn means that there does not seem to be any sort of justification for additional floorspace; • Object to control of floorspace by percentage of A1 use; During an economic climate where there should be a drive for town centre vitality and viability, such policies are considered too restrictive.
Option 137: Separate policy options for different types of centre	<ul style="list-style-type: none"> • Lots of support for this option which proposes a specific policy for each of the different types of centre and recognises the role and function of each type of centre would be different.

SECTION OF THE ISSUES AND OPTIONS REPORT (2012)	KEY ISSUES ARISING FROM CONSULTATION
NEW OPTIONS ARISING FOLLOWING COMMUNITY INVOLVEMENT	
No new options were suggested.	

Evidence base:

- Cambridge City Council Shopping Survey (2011/2012);
- Arup (2013). Cambridge City Centre Capacity Study
- GVA (2013) Cambridge Retail and Leisure Study Update

How the policy came about:

Need for the policy

19. The National Planning Policy Framework requires that in drawing up Local Plans, local planning authorities should define the extent of town centres and primary shopping areas, based on a clear definition of primary and secondary frontages in designated centres, and set policies that make clear which uses will be permitted in such locations.
20. It also requires that local authorities should promote competitive town centres that provide customer choice and a diverse retail offer and which reflect the individuality of town centres. Also to retain and enhance existing markets and, where appropriate, re-introduce or create new ones, ensuring that markets remain attractive and competitive.
21. The city centre is at the top of the hierarchy of centres and it is important to have a policy which supports the vitality and viability of the city centre and also sets out how to manage change within the primary and secondary frontages as is the case in the current Cambridge Local Plan 2006 (Policy 6/6).

Issues and Options Report

22. The Issues and Options Report set out two potential options dealing with shopping in different types of centre. Option 136 was a general shopping policy that applies to all centres, with some variations in relation to change of use relating to the type of centre. Option 137 was to have separate policies for different types of centre. In both policy options the policy would cover:
 - supporting vitality and viability;
 - having an appropriate scale of new development according to the nature and scale of the centre;
 - encouraging retail diversity and small shops;
 - control over change of use from retail (A1) to other uses; and

- prevention of over-concentration of food and drink outlets.
23. The consultation showed clear support for Option 137, where there would be separate policies dealing with the City Centre, district and local centres (although some have commented that the district and local centres could probably have shared policies). This approach was supported because it would clearly differentiate between the different types of centre and recognise their different role and functions.
24. With regards to the content of the policies, a summary of the comments received is provided below:
- Support for mixed uses and retail diversity and recognition that this can enhance vitality and viability of town centres.
 - Strong support for measures which promote smaller independent traders. Comments refer to Mill Road and King Street in the City Centre as being successful examples of this.
 - Support for discouraging the conversion of smaller units into larger.
 - Support for using upper floors for residential or other uses such as offices.
 - Comment that fast food outlets should not be located in proximity to schools and young people's amenities to help tackle obesity.
 - Some objection to large retail developments having to provide smaller retail units as this could over burden development with unnecessary restrictions, which is not in line with the National Planning Policy Framework. Other comments suggest that this would have to be subject to viability and suitability tests and any such units should not be held permanently open if there isn't specific interest.
 - Comments that there are vacant units within the City Centre and with the growth of the internet and economic downturn there is no further justification for further retail.
 - Comment that current policies are too precious about change of use from A1, and that we are no longer a nation of shop keepers.
 - Comments that scale, diversity, sustainability and prevention of over-concentration of uses are extremely important in light of local requirements, quality of life and impact.
 - Comment that policy should be used to ensure that large retail units can be delivered in the City Centre to meet existing demand and enable the city to grow as a regional centre.
 - Comment that the City Centre public realm needs to be improved or it could have an impact on Cambridge's competitive retail advantage, particularly under the current economic climate.
 - Comment that higher order centres should also offer the variety of goods found in lower centres.
 - Prevent the demise of local centres with shops being replaced by student housing (eg Newnham Road).

- Comment suggesting that where shopping premises are found to be difficult to let, occasionally permitting office use.
25. As considerable support was given to having separate policies for different types of centre, it is proposed that this approach is followed as it will make it very clear to an applicant dealing with a particular type of centre what the Council's requirements are. This policy deals with the City Centre. Another policy deals with district, local and neighbourhood centres. It was decided that these lower order centres should be grouped together because the policies would be very repetitious otherwise, however where there are differences between centres this is made clear.

Interim Sustainability Appraisal

26. Options 136 and 137 were considered in the Interim Sustainability Arraisal. With regards to Option 136 (General shopping policy that applies to all centres) the Sustainability Appraisal stated 'This Option, based on existing policies would likely result in consent of similar shopping provision as provided to date. Although this would provide greater support for diversity of shopping provision by restricting change of use from small shops to larger units and requiring that large shopping developments provide a proportion of small shops. Furthermore, the encouragement of housing development on upper floors should contribute to meeting the City's housing shortage and provision of smaller (1/2 bed) homes'.
27. With regards to Option 137 (Separate policy options for different types of centre) the Sustainability Appraisal stated 'This Option would provide the opportunity to tailor change of use criteria appropriately at the City, District and Local centre level; thus helping better address their different requirements more effectively. In particular this approach could protect and support provision of convenience shopping in district and local centres, an identified sustainability issue. Meeting local need more effectively should help reduce the need to travel and help mitigate climate change impacts'.

Evidence from Shopping Survey

28. The Cambridge City Council Shopping Survey (2011/2012) has been used to identify the primary and secondary shopping frontages and the primary shopping area (PSA). The proportion of shops (A1) in each of the street frontages and shopping centres in the City Centre has been calculated. This proportion has been used to identify the streets with a high concentration of shops, which are the primary frontages in line with the glossary definition in the National Planning Policy Framework.
29. The table below set out the primary frontages in Cambridge and the proportion of A1 uses. The council wants to maintain a high proportion of A1 uses in the primary frontages and that is why the policy seeks to maintain 70%

A1 uses in these frontages. However, a few streets have less than 70% A1 uses, and in these streets changes of use from A1 to another centre use would not normally be permitted unless it can be shown that such a change would be beneficial to the vitality and viability of the frontage.

Primary Frontages

Frontage	No of units	% A1	Notes
Bridge Street (south of Round Church Street)	13	92	
Burleigh Street	38	68	Burleigh Street is currently secondary frontage, but has been designated as Primary Frontage because this area has been identified as an Area of Major Change
Christ's Lane	6	50	This is an important linkage between the historic core and Fitzroy / Burleigh / Grafton PSAs.
Fitzroy Street	27	85	
Grafton Centre	57	89	
Grand Arcade	52	94	
Green Street	18	78	
King's Parade	20	85	
Lion Yard	24	100	
Market Hill	14	86	
Market Street	18	78	
Petty Cury	29	86	
Rose Crescent	17	82	
Sidney Street	28	68	
St Andrew's Street (north of Downing Street)	19	63	
St John's Street	6	67	
St Mary's Passage	4	75	
Sussex Street	12	92	
Trinity Street	24	83	

Those highlighted in grey are below 70%

30. Below is a table showing the main secondary frontages, where there are more than 10 units. Where streets join together and make a logical frontage, this is

shown. In the secondary frontages the proportion of A1 uses varies, but is as low as 35% on Regent Street / St Andrew's Street. To provide greater flexibility in these frontages it was decided that A1 uses should remain predominant and shouldn't be allowed to fall below 50%. In those frontages already below 50% further loss of A1 to other uses would not be permitted. The current Local Plan specifies that A1 uses shouldn't fall below 60% in the secondary frontages, so 50% will provide additional flexibility over current levels. It was decided to have a blanket threshold, rather than specifying different thresholds for individual streets.

Main secondary frontages

Frontage	No of units	% A1	Notes
Bene't Street / Peas Hill / Wheeler Street / Corn Exchange Street	17	65	
Bridge St (north of Round Church Street)	19	47	
East Road / Dover Street	11	45	
Hobson Street / King Street	36	64	
Magdalene Street / Quayside	21	71	
Regent Street / St Andrew's Street (south of Downing Street)	71	35	

Those highlighted in grey are at or below 50%

Evidence in Retail and Leisure Study Update (2013)

31. The Retail and Leisure Study Update looks at Cambridge City Centre in Chapter 4. It shows that the City Centre as a whole has a strong comparison shopping offer and low vacancy rate compared with the national average.
32. The historic core is largely dominated by comparison goods retail. The study also shows that 60% of all comparison units in the historic core are occupied by multiple retailers, which exceeds the national average (42%). This provides evidence in support of policy measures which support smaller independent traders. The majority of the multiples are concentrated around the Grand Arcade, Lion Yard, Market Place and Sidney Street. The level of convenience goods shopping is below average in the historic core, and provided by the Sainsbury's and M&S Simply Food, and other small health food shops, bakeries and newsagents. Leisure in the form of cafés, restaurants and bars are found

along Bridge Street, St Andrews/Regent Street, King Street and around Market Place and King's Parade and is broadly in line with the national average.

33. The Fitzroy/Burleigh Street area including the Grafton Centre comprises predominantly comparison goods shopping, with service and convenience provision below the national average. There is some leisure in the upper floor of the Grafton, including the cinema, and some cafés along Burleigh Street, but this offer is less than the national average in terms of floorspace and number of units. Vacancy levels are slightly better than the national average.
34. The study recommends that the council should reconsider the appropriateness of the existing Primary Shopping Frontage and where necessary redefine it over those areas which would benefit from remaining principally within higher order retail use (eg Grand Arcade, Lions Yard). However, some flexibility should also be allowed to enable complementary food and drink uses to come forward where it can be demonstrated that retail use is not a suitable or viable option. Outside the defined primary frontage the study recommends that there should be greater scope for some A1 retail frontage to convert to A3 or A4 usage, particularly in areas attracting large numbers of tourists.

Evidence in City Centre Capacity Study

35. The study makes recommendations on the extent of the Primary Shopping Area, which has been taken into account in the drawing of these boundaries on the Policies Map.
36. The study also makes recommendations on the extent of the primary and secondary shopping frontages. The Council is in agreement that only the main secondary frontages should be shown on the Policies Map.

Issues and Options 2 Consultation

37. There was no consultation on the city centre boundary, primary shopping area boundary or primary and secondary shopping frontages at Issues and Options 2 stage, because the evidence from two key studies was being awaited - the Cambridge Retail and Leisure Study Update and Cambridge City Centre Capacity Study.

Findings of the Sustainability Appraisal of the Cambridge Local Plan (July 2013)

38. The appraisal notes that the plan should lead to significant positive effects in terms of encouraging economic growth through capitalising on the four strengths of Cambridge's economy, which includes retail. The appraisal highlights that retail growth should increase the city's attractiveness to shoppers and visitors. The role of this policy in promoting community facilities

in the city centre and protecting existing assets should result in positive effects in relation to the sustainability objectives of community and wellbeing.

39. In terms of the retail growth that is to occur in the city centre, Policy 10 indicates that A1 uses will be supported. It also indicates that proposals for other 'A Class', leisure and tourism uses which are suitable in a centre will be supported were they complement the retail function of the area. The policy also seeks to protect retail uses in the primary and secondary frontages. This includes criteria stating that the loss of centre uses at ground floor level to non-centre uses within primary and secondary frontages will not be permitted, unless it can be demonstrated that the use is no longer viable. These measures to encourage and protect such uses are likely to produce positive effects in terms of the local economy. In addition, the policy will support a mix of uses, including residential and community facilities on upper floors, whilst also protecting and promoting the two outdoor markets. Together these measures should help to ensure significant positive effects in terms of the local economy and the quality of the centre.

Key Issues raised during Proposed Submission consultation

Policy 10: Development in the City Centre Primary Shopping Area	
Total Representations: 7	
Object: 6	Support: 1
Objections	<ul style="list-style-type: none"> • Public transport accessibility must be improved; • Need to provide more support for independent traders; • Amendments need to be made to the policy and its supporting text in order to provide greater flexibility such that the vitality and viability of the city centre can be maintained. 70% retail threshold is a particular concern; • The cap on non-A1 retail floorspace is unduly prescriptive and artificially restricts the range of prospective occupiers who could assist in consolidating and enhancing the viability of the city centre – the cap should be reduced to 50% within the primary shopping frontage; • Provision of retail and leisure floorspace will ultimately be driven by demand and the extent to which individual schemes are viable – reference to provision of large and small units in developments above 2,500 sqm should be amended to reflect this; • The range of suitable uses on upper floors within the Primary Shopping Area should be widened to include the potential, in principle, for the full range of main town centre uses identified in the NPPF; • Re: Market Square – critical to learn from past attempts to enhance the market square and ensure that the council works with other partners such as the Business Improvement District (BID) and potentially City Deal to develop a shared vision with the market holders.

Support	<ul style="list-style-type: none"> • General support.
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Minor Modifications suggested following Proposed Submission consultation and implications for Sustainability Appraisal

40. No changes to Policy 10: Development in the City Centre Primary Shopping Area or the supporting text are suggested in the Addendum to the Cambridge Local Plan 2014: Proposed Submission document. There are therefore no impacts on the findings of the Sustainability Appraisal.

Policy 11: Fitzroy/Burleigh Street/Grafton Centre Area of Major Change

EXISTING POLICY TO BE REPLACED (CAMBRIDGE LOCAL PLAN 2006)	OPTION(S) BEING TAKEN FORWARD FROM THE ISSUES AND OPTIONS REPORT (2012) AND ISSUES AND OPTIONS 2 (2013)	OPTION(S) NOT BEING TAKEN FORWARD FROM THE ISSUES AND OPTIONS REPORT (2012)
Not applicable	<ul style="list-style-type: none"> • Option 24 City Centre (paragraph 4.36) 	Not applicable

Key issues raised during Issues and Options (2012) and Issues and Options 2 (2013) consultations:

SECTION OF THE ISSUES AND OPTIONS REPORT (2012)	KEY ISSUES ARISING FROM CONSULTATION
Option 24: City Centre	<ul style="list-style-type: none"> • City Centre capacity (or lack of) is a reoccurring theme – no space for development; • Must maintain the historic centre; • Difficult to advance the City Centre in terms of number of people and commercial interest etc. without impacting its beauty and historical importance; • Some support from Colleges for policy; • Many concerns about Park, Bridge and Magdalene Streets. • Some support for Market Square and Peas Hill suggestions. • Too many buses in City Centre – some responses suggest banning them altogether. • Less chain shops, more variety is cited as a desire by numerous respondents. • Any changes need considerable consultation with public.

SECTION OF THE ISSUES AND OPTIONS REPORT (2012)	KEY ISSUES ARISING FROM CONSULTATION
NEW OPTIONS ARISING FOLLOWING COMMUNITY INVOLVEMENT	
No new options were suggested.	

Evidence base:

- Arup (2013). Cambridge City Centre Capacity Study
- GVA (2013) Cambridge Retail and Leisure Study Update

How the policy came about:

Need for the Policy

41. The National Planning Policy Framework requires that in drawing up Local Plans, local planning authorities should allocate a range of suitable sites to meet the scale and type of retail, leisure, commercial, office, tourism, cultural, community and residential development needed in town centres. It requires that needs for retail, leisure, office and other main town centre uses are met in full and are not compromised by limited site availability. Local planning authorities should therefore undertake an assessment of the need to expand town centres to ensure a sufficient supply of suitable sites.
42. The Cambridge Retail and Leisure Study Update provides evidence of the need for further retail and leisure during the plan period. The City Centre Capacity Study, looks at the capacity of the City Centre for additional uses as this is the Council's preferred location for further retail and leisure uses.

Issues and Options

43. One of the supporting paragraphs (paragraph 4.36) to Option 24 on the City Centre in the Issues and Option Report referred to the Fitzroy, Burleigh Street and Grafton as an area which could potentially provide opportunities for redevelopment and expansion with improved links to the historic City Centre and the retail parks. The consultation responses received did not make specific reference to this potential area of opportunity, other than a response from English Heritage, which said that 'it may be better to give this area a speciality than for it to compete with the city centre'. The comment is referring to the historic core as the City Centre, but the Fitzroy, Burleigh Street, Grafton area is already a recognised part of the City Centre. The Grafton already markets itself as more affordable, family orientated shopping and the suggestion that it has a different type of offer to the historic core is appropriate.

44. The Sustainability Appraisal did not address this area as having potential for redevelopment and expansion, as it was not referred to specifically in Option 24.

Evidence in Cambridge Retail and Leisure Study Update (2013)

45. The Retail and Leisure Study Update looks at the need for further convenience and comparison goods floorspace during the plan period to 2031. With regards to comparison floorspace, the study states that on the basis of current market shares of the city centre and out-of-centre retail provision (an 80% retention rate of expenditure in the study area) and allowing for an inflow of 36% (based upon a in-centre survey carried out in 2008) and known commitments there is capacity to support approximately 3,820 sqm net additional comparison floorspace at 2017, increasing to 14,141 sqm net by 2022, to 31,226 sqm net by 2027 and to 39,976 sqm net by 2031.
46. The Study looks at other factors which could affect the level of capacity forecast for comparison floorspace. These include the potential effect other major planned developments in the area including retail developments at Peterborough and Huntingdon and the planned new town centre at Northstowe, which could potentially claw back a proportion of spend currently directed towards Cambridge. The consequence of wider developments could be to meet all available need in the City in the short – medium term. However, over the longer term there is still forecast capacity to support c.13,637 sqm net additional comparison goods floorspace by 2027, increasing to c.21,563 sqm net by 2031.
47. The forecasts have taken into account growth in Special Forms of Trading (SFT) (particularly internet spending) based upon levels set out by Experian (a firm specialising in retail forecasting rates). However, the Study points out that there is no certainty over this and in physically constrained places like Cambridge, retailers are more likely to maximise the use of the internet or generate new innovations in order to suppress demand for additional floorspace. As a result, the Study has also looked at a forecasting scenario where the proportion of spend on SFT is raised from 16% to 20% over the period 2022-2031. The results of both of these scenarios together reduces the need for comparison retail even further to 4,579 sqm net by 2027 and 12,444 sqm net by 2031. However, the Study is clear that given the inherent uncertainties in forecasting over such a long period of time, longer term forecasts should be treated with caution and updated at regular intervals during the plan period.
48. The Study recommends that for comparison goods, there is an element of uncertainty particularly given new developments coming forward in the wider area which will inevitably effect the capacity forecast for the City. As a result it is not considered feasible for the Council to plan to fully meet the capacity up to 2031, and it is recommended that the Council strategy should, in the first

instance, be to focus on planning to meet the capacity identified up to 2022 (ie 14,141 sqm net¹). As this capacity is sensitive to developments in the wider area, there will also need to be a degree of cooperation between Local Authorities and on-going monitoring to establish the extent to which some of the capacity identified may be met elsewhere.

49. At the top of the retail hierarchy the City Centre should be the primary focus to meet the identified capacity for additional comparison retail development up to 2022. The historic core is constrained in this respect and is unlikely to be capable of accommodating a substantial amount of additional comparison floorspace. However, the study recommends that there may be scope to accommodate some of the identified capacity in the Fitzroy/Burleigh Street area of the City Centre, and that this should be regarded as the first priority in sequential terms, and that the Council should adopt a pro-active approach in trying to bring this forward.
50. Other evidence for supporting the City Centre is found in the Retail and Leisure Study. The Study shows that whilst Cambridge City Centre is clearly the most dominant comparison shopping destination in the survey area, attracting an overall market share of 57%, this represents a marginal decline in market share (5%) since 2008. At the same time the retail warehousing off Newmarket Road has increased its market share from 15% in 2008 to 24% in 2012. This reinforces the need for the City Council to support the City Centre and maintain the complementary role of the out-of-centre retail warehousing and resist development here which would have the effect of creating direct competition with the City Centre.

Evidence in Cambridge City Centre Capacity Study (2013)

51. The City Centre Capacity Study identifies East Road / Grafton / Fitzroy Street and Burleigh Street as an area of potential change. It refers to a long-term opportunity to plan for the comprehensive redevelopment of the Grafton shopping centre and potentially Fitzroy and Burleigh Street, although recognising that this may be difficult given the multiple ownerships. There is potential for additional retail and leisure with residential and / or student accommodation above. Although the study looks at potential floorspaces for these uses, this cannot be quantified with any certainty until detailed masterplanning and design has taken place.
52. The study also makes suggestions in relation to streetscape, highway and public realm improvements along East Road and Fitzroy / Burleigh Street, and linkages to the historic core. These opportunities can be considered in the masterplanning of the area.

¹ For comparison the Grand Arcade is c.41,000 sq m gross, which at a net:gross ratio of 70%, gives c.28,700 sqm net, the Grafton is c.38,460 sq m gross, which at a net:gross ratio of 70%, gives c.26,922 sqm net.

Findings of the Sustainability Appraisal of the Cambridge Local Plan (July 2013)

53. The findings of the Sustainability Appraisal are that the plan as appraised should lead to significant positive effects in terms of encouraging economic growth through capitalising on the strengths of Cambridge’s economy, including retail. Through proposing sustainable growth in the retail sector, the plan should help protect against negative or undesirable effects. The inclusion of criteria to promote/provide access by sustainable modes of transport this should help to discourage private car use and enhance the use of more environmentally friendly modes of transport. The appraisal also found that the policy should have positive effects on the sustainability objectives of community and wellbeing through the provision of housing, retail and employment opportunities.
54. The Sustainability Appraisal notes that particular focus for the development of additional comparison retail in the city centre, along with other mixed uses, will be the Fitzroy/Burleigh Street/Grafton Area of Major Change. Policy 11 notes that the precise quantum of development to take place in the area is to be subject to testing and demonstration through the development of a masterplan. This should help to provide flexibility to developers whilst ensuring that an optimum outcome is achieved. In addition, the policy calls for townscape and public realm improvements and a focus on providing access by sustainable modes of transport which should result in wider benefits. Given the varying quality of shops and the public realm in this area currently, this policy approach should result in positive effects.

Key Issues raised during Proposed Submission consultation

Policy 11: Fitzroy/Burleigh Street/Grafton Area of Major Change	
Total Representations: 11	
Object: 8	Support: 3
Objections	<ul style="list-style-type: none"> • Implies that the existing shopping in these streets is varied in a bad sense. Residents enjoy the variety and openness of this area, blending with its traditional layout. The Grafton Centre is big enough – we do not want a blanket mall over the whole area, as originally put forward by Grosvenor Estates in the 1970s; • M&G Real Estate and The Prudential Assurance Company Limited, while supportive of the overarching objectives of the policy, are concerned that only limited discussions about development potential have been carried out. Of particular concerns are the references to the development of a masterplan and the onus being put on us to produce such a document when

	<p>the feasibility of such an approach has yet to be properly explored. The policy should be reworded;</p> <ul style="list-style-type: none"> • Policy is too restrictive in terms of mixed use. It could also accommodate B1 on upper floors and B2 (general industry) not on street frontages. D1 could also be accommodated on upper floors; • The area should not duplicate the City Centre retail offer but provide a real contrast; • Policy should include some reference to building heights, which will need to respect the setting of the adjacent historic core and demonstrate an understanding of how the development may appear in the backdrop to listed buildings and important areas of open space. Height as viewed from Elizabeth Way bridge also needs careful assessment and consideration; • References to this area being the primary focus for additional comparison retail in the City Centre are a concern due to the implications this may have for existing and future investment in the historic core. While potential for regeneration of this area is acknowledged, it cannot be allowed to undermine the vibrancy of the historic core. Reference needs to be included to the undertaking of a retail impact assessment; • Support regeneration of this area but needs to be done sensitively and strategically. Look to create more innovative use of multi-storey car parks, for example make them accessible for use by residents overnight; • Proposals for substantial redevelopment of this area must also be required to contribute to investment in the city's infrastructure, to be identified as part of masterplanning.
Support	<ul style="list-style-type: none"> • Support for the development of a masterplan for the area. The area needs a revamp and cycle access in particular needs to be improved.

Minor Modifications suggested following Proposed Submission consultation and implications for Sustainability Appraisal

55. No changes to Policy 11: Fitzroy/Burleigh Street/Grafton Area of Major Change or the supporting text are suggested in the Addendum to the Cambridge Local Plan 2014: Proposed Submission document. There are therefore no impacts on the findings of the Sustainability Appraisal.

Policy 12: Cambridge East

EXISTING POLICY TO BE REPLACED (CAMBRIDGE EAST AREA ACTION PLAN 2008)	OPTION(S) BEING TAKEN FORWARD FROM THE ISSUES AND OPTIONS REPORT (2012) AND ISSUES AND OPTIONS 2	OPTION(S) NOT BEING TAKEN FORWARD FROM THE ISSUES AND OPTIONS REPORT (2012)

	(2013)	
<ul style="list-style-type: none"> • Policy CE/3 The Site for Cambridge East • Policy CE/35 Phasing North of Cherry Hinton 	<ul style="list-style-type: none"> • Option 35 Cambridge East – safeguarded land 	<ul style="list-style-type: none"> • Option 34 Cambridge East – retain current allocation • Option 36 Cambridge East – return the land back to the Green Belt

Key issues raised during Issues and Options (2012) and Issues and Options 2 (2013) consultations:

SECTION OF THE ISSUES AND OPTIONS REPORT (2012)	KEY ISSUES ARISING FROM CONSULTATION
Cambridge East – general comments	<ul style="list-style-type: none"> • The airport pollutes the city and is too near to built-up areas; • Designate the site in the plan as an airport; • Any future development should factor in the need for high quality provision for cycling in order to reduce impacts on the local transport infrastructure; • Retain the existing approach of 4 major growth areas, ensuring public transport connectivity; • Consider the need for provision for household recycling centre and a commercial waste management facility in the Cambridge East area.
Option 34: Cambridge East – Retain current allocation	<p>ARGUMENTS IN SUPPORT OF THIS OPTION:</p> <ul style="list-style-type: none"> • Housing is needed; • If this area is built out, consideration must be given to how people travel in to Cambridge as Newmarket Road is highly congested; • Marshall should be encouraged to relocate. <p>OBJECTIONS TO THE OPTION:</p> <ul style="list-style-type: none"> • Marshall confirms its intention to remain at Cambridge Airport for the foreseeable future; • We should not continue an approach predicated on Marshall moving away from Cambridge Airport, including the land North of Newmarket Road; • This option will have negative impacts on biodiversity according to the Sustainability Appraisal.
Option 35: Cambridge East – Safeguarded Land	<p>ARGUMENTS IN SUPPORT OF THIS OPTION:</p> <ul style="list-style-type: none"> • Cambridge and its sub-region have a history of buoyant growth over many years. Growth will continue. Designating Cambridge East as safeguarded land reflects its inherent qualities as a sustainable

	<p>location and will give flexibility in the longer term;</p> <ul style="list-style-type: none"> • Support the retention of the allocation in the interests of safeguarding a direct cycleway between Cambridge East and Lode; • Marshall should be encouraged to relocate. <p>OBJECTIONS TO THE OPTION:</p> <ul style="list-style-type: none"> • Delays decision-making with associated waste and costs incurred from business uncertainty; • Transport infrastructure is inadequate to deliver a sustainable development in this location; • This option will have negative impacts on biodiversity according to the Sustainability Appraisal.
<p>Option 36 – Cambridge East – return land back to the Green Belt</p>	<p>ARGUMENTS IN SUPPORT OF THIS OPTION:</p> <ul style="list-style-type: none"> • If Marshall decides to leave, the land should be returned to Green Belt. Currently, Marshall provides a green lung and barrier between the city and Cherry Hinton, as most of the land is grass around a runway, not intensively developed; • The land was only taken out of the Green Belt because it was to be used for housing. As it is not to be used for housing (for the foreseeable future) it should be returned to Green Belt; • The airport should remain where it is; • Option 36 is likely to deliver significant benefits in addressing key sustainability issues relating to transport, water, flood risk, landscape and biodiversity as compared to protecting this area for future development. <p>OBJECTIONS TO THE OPTION:</p> <ul style="list-style-type: none"> • Housing in sustainable locations is needed over Green Belt; • Successive studies have confirmed that land at Cambridge East does not fulfil any Green Belt function. The 2012 Green Belt Study by LDA Design confirms that Green Belt boundaries are to endure and should only be altered in response to exceptional circumstances. None exists (Marshall); • Site is of little value ecologically in comparison to other Green Belt sites; • The Green Corridor opposite Teversham should be retained as Green Belt: the rest of the site should be Safeguarded Land outside Green Belt designation.
<p>Whilst in South Cambridgeshire</p>	<ul style="list-style-type: none"> • Land north of Newmarket Road remains an obvious site for development, providing public transport along

<p>District Council, what issues do you think there are for the city with development coming forward on land north of Newmarket Road?</p>	<p>Newmarket Road corridor can be improved;</p> <ul style="list-style-type: none"> • There should be a much more serious look at potential for enhanced flood risk caused by building on green areas. Permission for new development should only be granted if consistent with Strategic Objective 2 (reduction of flood risk); • A good opportunity for development - probably housing, but also a site for a football stadium; • This development would put yet more pressure on traffic on Newmarket Road; which is badly designed, badly congested and the least attractive approach to the city. The whole area from Barnwell Bridge to Elizabeth Way roundabout needs remodelling, including the retail park which could be reduced in size, with a service road to reduce pressure on the main road. Some scope for housing development if the retail area was reduced; • Development north of Newmarket Road should safeguard the open spaces between Cambridge and Fen Ditton to preserve an extensive area of open land in this part of the city and South Cambridgeshire given the increasingly intensive developments that are likely in the immediately adjacent urban areas; • Sustainable transport infrastructure is key to the development of this area;
<p>Are there any other reasonable alternatives that should be considered at this stage?</p>	<ul style="list-style-type: none"> • Retain Cambridge Airport and add new option to protect and develop the airport further.

Evidence base:

- South Cambridgeshire District Council and Cambridge City Council (2008). Cambridge East Area Action Plan

How the policy came about:

56. Cambridge East was taken out of the Cambridge Green Belt in the Cambridge Local Plan 2006 and Cambridge East Area Action Plan 2008 for the development of a major new urban extension. This was dependant on the current operator relocating, something they were actively seeking to do at the time. In 2010 it became clear that the site operator could not find a new site to relocate to and they announced that they would remain at the Airport for the foreseeable future. This left the Councils with decisions to be made as to how to plan for land at Cambridge East, with residential development across the wider site unlikely in the plan period.

57. In June 2012, Cambridge City Council consulted upon three broad options in the Issues and Options consultation as to how Cambridge East should be planned for. These were:
- Retain the current allocation – this would keep the area as a housing allocation for a major new urban quarter. However, the full level of housing provision would not be relied upon in plans, as it would be unlikely to be developed. This approach would provide flexibility if development could occur in the plan period, although it would also create uncertainty, and residential delivery options elsewhere would still have to be explored.
 - Safeguard the land – this would keep the area as ‘safeguarded land’ that could be developed in the longer term, outside the plan period. This would allow a future review of the plan to consider the wider site again if circumstances change.
 - Return the land to the Green Belt – this would return the site in whole or in part to the Cambridge Green Belt, on the basis that development would not occur.
58. The consultation showed there was little appetite for retaining the site as a residential allocation. Returning the site to the Green Belt received the most representations, with safeguarding the land for future development receiving slightly less support.
59. Key points raised include:
- Concerns over pollution from the airport;
 - Housing is needed;
 - Concerns over transport impacts of any options;
 - Safeguarding retains flexibility;
 - Marshalls should be encouraged to relocate;
 - Marshalls are not going to relocate and should be supported on their current site;
 - Impacts of development on biodiversity;
 - The site provides a green lung for the city;
 - Airport growth should be supported.
60. The Interim Sustainability Appraisal Report of these options stated:
- Retaining the current allocation for development would help safeguard potential future housing provision. If delivered this would contribute significantly to addressing key communities and well being sustainability issues relating to housing, community and education provision and may help address aspects of deprivation in this area. Although this Option is likely to increase pressure on transport infrastructure this is uncertain; as the development is unlikely to be delivered until 2031 by which time transport provision may be radically different to today. Should

development be brought forward more quickly (for which this Option provides flexibility) then adverse transport impacts would be expected. As the AAP notes the development of Cambridge East would take many years to complete and as it wouldn't be delivered for a number of years this appraisal is inherently uncertain.

- Safeguarding land for future development would result in largely similar effects across the sustainability topics. However it would provide less certainty to developers and may hamper confidence in the local economy.
- Option 36 is likely to result in adverse effects against the community and well being sustainability topic. The loss of this land that could otherwise deliver significant housing, employment and community service provision is likely to minimise the opportunities to help address housing, health and potentially employment deprivation within this area. In contrast this Option would likely deliver significant benefits in addressing key sustainability issues relating to transport, water, flood risk, landscape and biodiversity as compared to protecting this area for future development. Notwithstanding, this appraisal is inherently uncertain as It is not expected that this land would be made available until 2031, in which time key issues identified for this appraisal may have changed.

61. Given the change in circumstances with the airport operator remaining on site for the foreseeable future, and the lack of support for retaining the current allocation it is not appropriate for the current allocation of the whole airport site in the Cambridge East Area Action Plan to remain 'live'. Were circumstances to change in the future then a review of the plan could consider this.
62. Likewise it is also inappropriate to put the site (in whole or in part) back into the Green Belt. If circumstances on the site were to change in the future and the wider site was capable of coming forward for residential development then the findings of the Inner Green Belt Boundary Study 2001 and Green Belt Boundary Study 2002, and the decisions taken in the Cambridge Local Plan 2006 and the Cambridge East Area Action Plan 2008 would still be relevant. Specifically, the site's contribution to the Green Belt purposes would still be low, and the site would still be capable of making a significant contribution to meeting the housing needs of Cambridge if it becomes available for development. Furthermore, putting the site back into the Green Belt, when there is still a possibility that Marshalls may move outside the plan period, may undermine the permanence of the Cambridge Green Belt. Paragraph 85 of the National Planning Policy Framework states that "when defining Green Belt boundaries local planning authorities should... satisfy themselves that Green Belt boundaries will not need to be altered at the end of the development plan period". If the site became available after the plan period the, and the Councils made the decision to allocate the land again, then the site coming in and out of the Green Belt multiple times would undermine the permanence of the Green Belt.

63. Paragraph 79 of the National Planning Policy Framework states that one of the essential characteristics of Green Belts are their openness and their permanence. Paragraph 83 of the National Planning Policy Framework states the once established Green Belt boundaries should only be altered in exceptional circumstances and when considering boundaries regard should be had to their intended permanence, in the long term, so they should be capable of enduring beyond the plan period.
64. Safeguarding the land in order to meet longer term development needs should circumstances change, means that the situation can be looked at again in a future plan review without undermining Green Belt policy.
65. There are a number of opportunities for residential development on the site while the airport remains in operation. One of these: North of Newmarket Road, is almost entirely within South Cambridgeshire; one parcel North of Cherry Hinton (North of Teversham Drift) is partly in South Cambridgeshire, and the other parcel North of Cherry Hinton (North of Coldham's Lane) is entirely in Cambridge. Careful consideration of how these developments interact with the ongoing airport operations will be needed. Similarly, consideration of how the development works when the proposals come forward, and also as part of any potential future wider development.

Findings of the Sustainability Appraisal of the Cambridge Local Plan (July 2013)

66. The findings of the Sustainability Appraisal noted that in terms of protection of health, policy 12 should lead to positive effects. This is due to the fact that the policy calls for residential proposals in Cambridge East to demonstrate that any environmental and health impacts (including noise) from the airport can be acceptably mitigated for residents of new development. In the longer term, any redevelopment of the airport site should lead to positive effects in terms of providing for additional housing and community facilities.

Key Issues raised during Proposed Submission consultation

Policy 12: Cambridge East	
Total Representations: 15	
Object: 11	Support: 4
Objections	<ul style="list-style-type: none"> • No justification for further housing on the Green Belt; • Object to allocation of site R40 (land north of Teversham Drift) due to traffic generation, highway safety and road access, impact on services and local facilities, adverse impact on the environment including wildlife, and locality to airport; • There is no realistic chance of the site being developed in the foreseeable future and the land clearly performs important Green Belt functions. As such it is not appropriate to safeguard the site; • Specific consideration of how the increased use of the airport for

	<p>“international” flights will affect transport and development in the area must be included;</p> <ul style="list-style-type: none"> • Marshalls is a major local employer and the Local Plan should be encouraging them to stay in the area, not safeguarding their site for future redevelopment; • The supporting text should make it clear that the appropriate future development of the site includes delivery of the allocations made by the adopted Cambridgeshire and Peterborough Minerals and Waste Plan. These should also be shown clearly on the Proposals Map (they are currently overlaid by other notations); • Cambridge East cannot be relied on as a safeguarded site and as such, other land needs to be identified that fulfils the requirements of safeguarded land; • Cambridge East should not prevent the release of further sites from the Cambridge Green Belt where proportionate evidence demonstrates such releases could promote sustainable patterns of development.
Support	<ul style="list-style-type: none"> • Support from South Cambridgeshire District Council for the allocation of a small area of land north Newmarket Road and the more substantial area north of Cherry Hinton. The safeguarding of the airport site as long-term strategic reserve maintained outside of the Green Belt is also supported; • Support from the Marshall Group of Companies for the safeguarding of the site for long-term as the site remains a highly sustainable location for development.

Minor Modifications suggested following Proposed Submission consultation and implications for Sustainability Appraisal

67. As a result of assessment following consultation, one modification to the supporting text of Policy 12: Cambridge East is proposed. PM/3/001 in the Addendum to the Cambridge Local Plan 2014: Proposed Submission document was suggested in response to a representation (Representation Number 27312) and to ensure that sufficient consideration is given to the minerals and waste safeguarding areas indicated on the Policies Map and set out in the Cambridgeshire and Peterborough Minerals and Waste plan documents. The change to paragraph 3.17 is as follows:

“There is potential for residential development on several smaller parcels of land while the airport remains on the site. Careful consideration of how the ongoing airport activities will interact with any new residential use will need to be undertaken, to ensure that the new residences have an acceptable level of amenity, and that they do not impede on the ongoing use of the airport. In terms of how any development might impede use of the airport, it will be for the airport operators to demonstrate how the development does this. Any development that comes forward in advance of the wider site will have to be carefully planned so that it is capable of working both with and without the

wider development. This policy makes it clear that these areas are not part of the wider safeguarded site and could come forward for development before 2031, if the site becomes available and following a review of the Cambridge East AAP. In delivering appropriate future development across the wider site, consideration will need to have been given to the allocations made by the adopted Cambridgeshire and Peterborough Minerals and Waste plan documents.”

68. Following consideration of the impact of this change on the Sustainability Appraisal Framework, it has been concluded that this change does not materially alter the findings of the Sustainability Appraisal.

Policy 13: Areas of Major Change and Opportunity Areas – General Principles

EXISTING POLICY TO BE REPLACED (CAMBRIDGE LOCAL PLAN 2006)	OPTION(S) BEING TAKEN FORWARD FROM THE ISSUES AND OPTIONS REPORT (2012) AND ISSUES AND OPTIONS 2 (2013)	OPTION(S) NOT BEING TAKEN FORWARD FROM THE ISSUES AND OPTIONS REPORT (2012)
<ul style="list-style-type: none"> • 9/1 Further Policy/Guidance for the Development of Areas of Major Change • 9/2 Phasing of Areas of Major Change • 9/3 Development in the Urban Extensions 	Not applicable	Not applicable

Evidence base:

- Cambridge City Council (2006). Cambridge Local Plan 2006;
- Fenland Local Plan Core Strategy Proposed Submission February 2013 (Policy CS7 (urban extensions) and CS16 (Delivering and Protecting High Quality Environments Across the District)).

How the policy came about:

69. This policy is required for Cambridge because of the high levels of planned growth in the Areas of Major Change and Opportunity Areas and the resulting significant impacts on the city. It is important to ensure that new development in these areas is delivered in an appropriate manner and is of highest quality taking into account the constraints, needs and opportunities of the city.
70. The policy wording is a review and reworking of policies in Chapter 9 of the Cambridge Local Plan 2006 on Areas of Major Change;

- 9/1: Further Policy/Guidance for the Development of Areas of Major Change
 - 9/2: Phasing of Areas of Major Change
 - 9/3: Development in the Urban Extensions
71. The three policies have been brought together into a single coherent policy and then amended to reflect latest best practice from other local authorities and officers within the council.
72. The policy focuses on the defined Areas of Major Change and Opportunity Areas, but the supporting text indicates it could also apply to other developments that come forward which are of a comparable size and complexity.
73. The National Planning Policy Framework provides planning guidance, which has also been taken into account in the Local Plan review, including the development management considerations for the formulation of these general principles. With regards to the Areas of Major Change and Opportunity Areas, the following elements of the National Planning Policy Framework are relevant:
- supporting patterns of development that facilitate the use of sustainable modes of transport;
 - development of policies to promote a mix of uses for day-to-day activities including work on site. Key facilities such as primary schools and local shops should be within walking distance of properties;
 - delivery of a wide choice of high quality homes, including the provision of new homes through planning for larger scale developments such as extensions to towns; and
 - delivery of social, recreational and cultural facilities and services to meet community needs.
74. The policy is consistent with the requirements of the National Planning Policy Framework and provides positive guidance on the delivery of the major developments in the city, complementing the individual area policies provided later in section 3 of the draft Cambridge Local Plan 2014.
75. As the issue was not raised at the Issues and Options stage the matter was not covered in the Interim Sustainability Appraisal. The SA Consultants will comment on the draft policy in due course.

Findings of the Sustainability Appraisal of the Cambridge Local Plan (July 2013)

76. The Sustainability Appraisal found that this policy would have positive effects in terms of reducing transport related emissions as it calls for higher densities

of development at major transport interchanges, for new development to be fully integrated into transport networks and be supportive of public transport and active travel, providing for public transport improvements including buses and park and ride services. Locating development in sustainable locations should reduce the need to travel and reduce the need for motorised transport.

77. The policy requires new infrastructure to support development, including open space, recreation, green infrastructure, drainage and flood defences. This should lead to positive effects in terms of flood risk by ensuring that new development contributes to reducing flood risk across the city. The requirement within the policy for new developments to create a new, strong landscape framework guided by and incorporating existing and historic character and positive features should lead to positive effects in relation to landscape, townscape and cultural heritage.
78. The appraisal did consider that the wording of the policy could be strengthened in relation to the wider role that open spaces and strategic landscaping can play in maximising gains for biodiversity. However, no changes to the plan have been made as Policy 59 (Designing landscape and the public realm) already calls for biodiversity enhancement as part of the landscaping of new developments. Given that the plan should be read as a whole, it was considered that there was no need to duplicate the requirements of Policy 59 in this policy.

Key Issues raised during Proposed Submission consultation

Policy 13: Areas of Major Change and Opportunity Areas – General Principles	
Total Representations: 21	
Object: 13	Support: 8
Objections	<ul style="list-style-type: none"> • Needs more recognition of the need to protect and enhance the natural environment, including biodiversity; • Concern regarding the detailed elements of the policy relating to masterplanning and strategic landscaping. Policy should be amended to remain of a general nature, with bullet e) amended to read "Where the development is based on clearly articulated and justified objectives and approach through the provision of strategies and other overarching coordination documents as prescribed through the relevant planning permission". Reference to site-wide masterplans in paragraph 3.26 should be removed; • Policy wording needs rewording to provide more flexibility to reflect the different circumstances of each of the Areas of Major Change and Opportunity Areas; • Criterion (k) should be strengthened to read "...new strong, landscape framework in keeping with local character"; • It is not always possible to ensure all necessary infrastructure is in place and it is not appropriate to delay development if there

	<p>is not the potential for certain infrastructure to be in place;</p> <ul style="list-style-type: none"> • Criterion (d) is unrealistic in requiring support for development proposals from all landowners; • Need clarification as to who will produce masterplans; • Need to recognise that large scale projects are subject to funding restrictions, market conditions and occupier demands. Policy needs to be flexible in order to enable delivery; • Inset maps for the Areas of Major Change need to include Minerals and Waste Allocations and designations; • Protection of heritage assets should be referred to in the policy; • The density criterion (g) should be established by site-specific assessment and design and layout considerations to maximise site development proposals; • Natural England welcome criterion (j) of Policy 13 that ensures that public rights of way are protected, and enhanced where possible by development in Areas of Major Change and Opportunity Areas (AOMC), in line with paragraph 75 of the NPPF. However we advise that a more general policy to cover all development, not just in these particular areas, should be considered.
Support	<ul style="list-style-type: none"> • Important in ensuring that areas of major change are developed to the highest quality according to a comprehensive implementation plan; • It is essential that criterion (d) be retained as this seeks to minimise the potential for development proposals becoming inappropriately stymied or ransomed by third parties; • Environment Agency supports the policy, in particular criteria (i) to (j) in respect of water, which link to criteria (a) to (f).

Minor Modifications suggested following Proposed Submission consultation and implications for Sustainability Appraisal

79. As a result of assessment following consultation, two minor modifications were identified for Policy 13: Areas of major change and opportunity areas – general principles and paragraph 3.26 of the supporting text. Both changes are in the Addendum to the Cambridge Local Plan 2014: Proposed Submission document marked as PM/3/002 and PM/3/003.

80. PM/3/002 is a suggested change to Policy 13, criterion (e) in response to a representation (Representation Number 26571) and to ensure sufficient flexibility in bringing forward development in the areas of major change and opportunity areas. The amended criterion (e) reads:

“e. where the development is based on clearly articulated and justified objectives and approach through the provision of a site-wide masterplan, strategies and/or other over-arching coordination documents; and,”

81. PM3/003 is a suggested change to the supporting text for Policy 1 in response to a representation (Representation Number 26571) and to ensure sufficient flexibility in bringing forward development in the areas of major change and opportunity areas. The amended paragraph 3.26 reads:

“~~Substantive~~ Substantial development will not be permitted in advance of the preparation and approval of a site-wide masterplan, strategies and/or other over-arching documents as required by the scale and nature of development. Limited small-scale development may be permitted, providing it would not prejudice the longer-term development of the sites and is not considered to be premature in advance of the preparation of these documents.”

82. Following consideration of the impact of these changes on the Sustainability Appraisal Framework, it has been concluded that these changes do not materially alter the findings of the Sustainability Appraisal.

Policy 14: Northern Fringe East and land surrounding Cambridge Science Park Station

EXISTING POLICY TO BE REPLACED (CAMBRIDGE LOCAL PLAN 2006)	OPTION(S) BEING TAKEN FORWARD FROM THE ISSUES AND OPTIONS REPORT (2012) AND ISSUES AND OPTIONS 2 (2013)	OPTION(S) NOT BEING TAKEN FORWARD FROM THE ISSUES AND OPTIONS REPORT (2012)
<ul style="list-style-type: none"> Policy 9/6 Northern Fringe 	<ul style="list-style-type: none"> Option 33 Northern Fringe East 	<ul style="list-style-type: none"> Not applicable.

Key issues raised during Issues and Options (2012) and Issues and Options 2 (2013) consultations:

SECTION OF THE ISSUES AND OPTIONS REPORT (2012)	KEY ISSUES ARISING FROM CONSULTATION
General comments on the Northern Fringe East	<ul style="list-style-type: none"> Mixed use aspect is critical, requiring local retail, commercial and domestic elements; Support for the new Cambridge Science Park Station; Need for an exciting wider vision for the area to complement the delivery of the new station; Water treatment works should be downsized and recreated as a practical demonstration of a modern high tech sewage works; Need to consider increased use of energy from waste; Need to include provision of a new relief road linking Cowley Road and Fen Road; Support for the Chisholm Trail cycle route and cycle and

	<p>pedestrian bridge;</p> <ul style="list-style-type: none"> • There is scope at Northern Fringe East for higher density but there must be full consultation with the local community to ensure that it does not detract from the character of the wider area; • Proposals for the Northern Fringe East will need to consider impacts on local biodiversity and identify suitable mitigation and enhancement options; • Water treatment works should be moved to free up valuable development land; • In order to meet the growth that is currently envisaged, Anglian Water has investment plans in place to expand and upgrade the wastewater treatment works at Cambridge. This work is currently at feasibility stage and could involve relocation of assets on the site. This does not necessarily mean that the footprint of the works will become smaller. In any event, Anglian Water cannot envisage any situation where housing development on or close to the Anglian Water site would be acceptable; • Need to understand the impact of the development on traffic problems in Fen Road; • CamToo will destroy Stourbridge Common and Ditton Meadows. Furthermore, the creation of a bridge link to Chesterton does not depend on a sporting facility; • Need to consider the impact of CamToo on biodiversity, landscape and visual amenity; • Land should not be safeguarded for a busway across Stourbridge Common and Ditton Meadows as it would impact on landscape quality and amenity; • Need to move the waste water treatment works; • Need for high quality cyclist and pedestrian facilities, including a high-quality cycle route to Waterbeach and completion of the Chisholm Trail; • Need to consider the wider impact on the level crossing on Fen Road and the need for alternative access arrangements; • Need for consideration of the mix of uses, particularly the desire and need for residential use and hotel development in the locality as a result of station development; • Route required to reduce pressure on Chesterton High Street; • Gentrification with improvements to landscape, sewerage, drainage and access.
Option 33: Northern Fringe East	<p>ARGUMENTS IN SUPPORT OF THIS OPTION:</p> <ul style="list-style-type: none"> • The three authorities need to work closely together to

	<p>produce site-specific detailed analysis of the land use, transport, urban design and environmental planning options for the area's future use;</p> <ul style="list-style-type: none"> • Need for unified development of the area; • Priority should be given to employment; • Need to provide a new relief road to link Cowley Road to Fen Road; • Need to improve access for and safety of cyclists and pedestrians; • Support the delivery of development at Northern Fringe East, which should not involve any further land being released from the Green Belt. <p>OBJECTIONS TO THIS OPTION:</p> <ul style="list-style-type: none"> • Need to consider revising the Northern Fringe East to include the Fen Road area; • Need for flexibility to be built into any site specific policy for the area to ensure that redevelopment proposals can respond to market conditions operating at the time of delivery of development; • Need to clarify the boundaries of the site; • Need to clarify the approach to building heights in this location; • Need for detailed environmental assessment to ensure no adverse effects.
<p>What should the boundary be for this area?</p>	<ul style="list-style-type: none"> • The railway sidings and the land between the railway and Fen Road should be included leaving the river corridor between Fen Road and the river; • Bounded by the A1309, the line of the former railway line to the south of the Cambridge Business Park, the River Cam, taking in both sides of Fen Road, and the A14; • The railway line to the East should be the boundary, but the plan must allow for road access to Fen Road across the railway line; • The boundary should include Chesterton Fen, with a common interest in waste recycling and vehicle maintenance; • The boundary should include Chesterton Fen, there is scope for marina development independent of the CamToo project; • The boundary for commercial use should extend east of the railway up to Fen Road with an appropriate link road. To the east of Fen Road, it could be developed as a nature reserve; • The whole area on the map should be included;

	<ul style="list-style-type: none"> • No further than the city’s northern boundary.
<p>What should be the vision for the future of this area?</p>	<ul style="list-style-type: none"> • Possibility for a trans-shipment centre to enable lorries of unsuitable sizes to be kept out of the city centre; • Science Park reaching maturity. A demonstration of sustainable development and as a flagship for the city of the 21st century; • Well designed city district, with high density buildings and areas of greenery. A good mix of locally owned shops, businesses and leisure facilities. Transport geared towards bicycles and pedestrians, with provision of the Chisholm Trail; • Preservation of the village of Chesterton with a prosperous community, incorporating industry, transport infrastructure, the commons, the river and leisure pursuits; • This is an area where more intensive development could provide real benefits and resolve adequate access to Chesterton Fen at the same time. It is also a site where taller buildings could be appropriate as long as they do not overpower Chesterton; • Planning of Northern Fringe East must take the Fen Road area into account, particularly in terms of transport infrastructure; • The operation of the waste water treatment works must not be prejudiced by any other development in the area; • The new station should meet the highest standards of design. Car parking should be multi-storey and partly underground. Space above the station should be used for shops and offices. The road layout should be planned strategically using minimum space. Separate road access to Chesterton Fen should be provided and pedestrian and cycle access points carefully considered to minimise the impact on existing residents and green spaces; • Area needs to be considered as a key transport interchange.
<p>What should the key land uses be within this area?</p>	<ul style="list-style-type: none"> • Employment-led, rather than provision of housing for commuters; • Provision of the community stadium at Northern Fringe East; • Sustainable industry with some on-site retail provision; • Residential, with supporting transport infrastructure; • Mixed use development incorporating employment, retail and residential uses; • Upgraded waste water treatment works, mixed use to

	<p>maximise benefits of the station development and upgraded sewerage;</p> <ul style="list-style-type: none"> • Upgraded transport infrastructure, particularly for Fen Road area; • Waste compatible development near to waste water treatment works and safeguarding of land for sustainable transport infrastructure.
Do you think land in this area should be safeguarded for sustainable transport measures?	<ul style="list-style-type: none"> • Support for safeguarding land for sustainable transport measures; • Support for provision of the new railway station as part of a key transport interchange; • Endorsement of the extension of the guided busway or similar dedicated link along the railway line to Cambridge Station; • Improved bus links; • Monorail provision could be revisited; • Cycle route provision is essential; • Impact on on-street parking in wider area needs to be dealt with; • A new river crossing for pedestrians and cyclists is desirable; • New bridleways should also be included.
Are there any other reasonable alternatives that should be considered at this stage?	<ul style="list-style-type: none"> • Provision of a Community Stadium; • Provision of residential development, with supporting transport and other infrastructure.

Evidence base:

- Roger and Tym Partners (2008). Cambridge Northern Fringe East – Viability of Planning Options.
- Barry Shaw (2013). Workshop notes.
- AtisReal (2006). Cambridge Northern Fringe (East) Financial viability and feasibility assessment.
- Cambridgeshire County Council (2004). Cambridge Northern Fringe Traffic Assessment.

How the policy came about:

83. Cambridge Northern Fringe East is an area in the northern edge of the city near the Cambridge Science Park, which stretches across the administrative boundary into South Cambridgeshire. It has a number of uses within the area, essential to the city and wider area, but which do not make the best neighbours. Existing uses include, a Waste Water Treatment Works (WWTW), Railway Sidings, Aggregate transfer and various business uses.

84. Cambridge Northern Fringe East was allocated for residential-led development in the Cambridge Local Plan 2006 and South Cambridgeshire local Plan 2004. This allocation was dependant on the relocation of the WWTW to release land and remove the odour source from the area. Alongside this residential-led development a new railway station was proposed to serve the northern side of the city, linking into the road, bus, cycle and pedestrian routes.
85. The viability of relocating the WWTW was explored again following the adoption of these plans through the [Cambridge Northern Fringe East: Viability of Planning Options report](#). This report concluded that relocation of the WWTW was not viable and consequently comprehensive redevelopment of the site was not viable, an employment-led allocation should be explored. This approach is also consisted with the findings of the [Cambridge and South Cambridgeshire Employment Land Review 2008](#) (and its [2012 update](#)) and the [Cambridge Cluster Study 2011](#), both which highlighted the opportunities for enhancing the business uses on the northern fringe of Cambridge around the new railway station.
86. In June 2012 Cambridge City Council consulted upon a development option for the Northern Fringe East area. This option set out some key principles for the development:
- Regeneration of the wider area in a coherent and comprehensive manner;
 - Provision of high density mixed employment-led development including associated supporting uses to create a vibrant new employment centre;
 - Development to achieve excellent standards of sustainability and design quality;
 - To secure delivery of a major new transport interchange to service Cambridge and the Sub-region based on high quality access for all modes;
 - Improvements to existing public transport access to and from Northern Fringe East, with extended and re-routed local bus routes as well as an interchange facility with the Guided Bus;
 - Improved access for cyclist and pedestrians;
 - Delivery of high quality, landmark buildings and architecture; and
 - To minimise the environmental impacts of the WWTW and to support greater environmental sustainability in the operation of the site.
87. The consultation asked people what they thought of these priorities, as well as what their vision was for the area's future and what the boundary of this area should be. Issues raised during the consultation include:
- Strong support for close working with South Cambridgeshire District Council and Cambridgeshire County Council to ensure an integrated approach to the area;
 - Some support for employment-led development, but also some support for more of a mix of uses to enhance vitality;
 - Support for the new Cambridge Science Park Station;

- Concern for the transport implications of development and the need for new infrastructure solutions;
- Concern on impacts on biodiversity;
- Concern over the WWTW remaining onsite;
- Concern over noise and odour impact on existing and new development;
- Concern over the impact of development on the WWTW;
- There was no consensus over what the boundaries of the site should be. The eastern boundary was the most contentious, some said to include land east of the railway, some though the railway should be the eastern boundary;
- Various visions for the area were put forward, themes from these visions include:
 - Sustainable development;
 - High quality design;
 - High density;
 - Green;
 - Mixed-use;
 - Incorporation into existing communities;
 - High quality transport interchange;
 - Employment-led;
 - Upgraded WWTW; and
 - Upgraded transport infrastructure.

88. The Interim Sustainability Appraisal Report of this option noted that this option should deliver significant effects in terms of addressing deprivation and the wider need for regeneration in North East Cambridge. The Options focus on transport led growth should have significant effects on reducing the reliance on the private car and help mitigate related transport emissions. Provision for an interchange between local buses and the Guided Bus as well as improved access for cyclist and pedestrians should also contribute significantly to transport and climate change mitigation sustainability issues. The Option's identified key principles require high standards of sustainability and design quality which should help address key sustainability issues relating to the need for high standards of water efficiency, minimising landscape impacts and improving the quality of the built environment.

89. In April 2013 Cambridge City Council, South Cambridgeshire District Council and Cambridgeshire County Council held a workshop on the future of this area. Stakeholders were invited, including local Residents Associations, Anglian Water (who run the WWTW), local landowners and businesses and others. The workshop produced a number of headline findings, these are set out below:

Headlines

- Need to think long term, site-wide for the WWTW and to work with Anglian Water on future planning of the area (status quo with WWTW responding to, rather than part of, future plans will not be acceptable....);

- Employment-led, mixed use is the way to go in order to create a more vibrant area. Phasing / staging of any plans will need to be clear;
 - A form of "framework" or "master plan" needs to be progressed at a later stage, but for now a simple "loose fit" plan to support policy in both plans is what is needed with a hook to setting out a future framework is needed (based on land use needs and Anglian Water long term plans)
90. The facilitator also pulled together a set of issues arising from the workshop, these are set out below:

The Waste Water Treatment Works

- It was concluded that the Waste Water Treatment Works was critical to determining the future character of the area. (The implications, costs and impact of change went beyond current Anglian Water thinking.) A number of suggestions were made as to how the impact of the sewage works could be reduced while maintaining the facility on site, such as the work carried out in Brighton. These now need to be explored with a view to reducing its impact in the medium/long term.
- It was noted that the business planning process being undertaken by Anglian Water was on a short time scale and different time horizon to other planning work. It was also limited in its ambition. There was consensus in the need for something to happen that would reduce the negative impact of the works. This might be addressed by a joint consultancy study. A paper should be prepared that sets out the issues and prepares the ground for a high level meeting with Anglian Water. (Leader to Chairman level)
- Network Rail Depot: The railway lands presented the clearest opportunity to establish the new character of the area. A very powerful vision was presented at the beginning of the workshop by Tom Holbrook's 5th Studio which produced a cogent analysis of the opportunity and presented an achievable high quality urban plan. Delegates recognised that coordination between the railway management of the station and the development of the site was critical. It was concluded that the aggregate business could be reduced in area while remaining on the site for the short/medium term. Plans for this site need to be developed by a partnership between the public and private sectors.

Timescales:

91. The workshop adopted a phased approach to making suggestions and recommendations by reviewing the potential redevelopment of the area against three time scales of short, medium and long term. These were not precisely defined but short was assumed to be the next 5 years, medium 5 – 10 years and long term 10 -15 years and beyond.
92. It became clear that all the bodies involved were working to their own timescales. It was recommended that a paper should be produced that set out

all the plan making activity being undertaken by the public and private sectors in the area with a view to co-ordinating the different approaches. It was recommended that the three main private landowners should be part of the process. It was recommended that the paper setting out the issues should go forward to the local chief executives committee for high level agreement as to the process.

Boundaries:

93. The focus of the site was fine but the boundaries might be reviewed in terms of delivery and delivery partnerships. In particular the Green Belt / Fen Road issues were commented on by a very local group. Are there other groups with an interest in the green belt and its future shape that it would be helpful to involve besides the local community? How is the overall Cambridge green belt managed? Is there a need to review traveller policies in partnership? Does the existing Joint Planning Committee need to be reviewed in the light of this site's importance to Cambridge as a whole? (Reference was made to the London Legacy Development Corporation that is taking forward the redevelopment of the Olympic site.)

Type of Plan:

94. The workshop agreed that they wanted to see the detailed observations incorporated in future thinking. The specific nature of the site means that Local Plan policies are not likely to be sufficiently detailed to give certainty to the outcome. Alternative and additional plans should be considered including a local area action plan or non-statutory plan such as a masterplan or opportunity plan.

Private/public partnership:

95. The private sector land owners should be invited to work with the LA's to produce an overall document or provide funds for it to be jointly commissioned.

Conclusion:

96. Good places need a successful long term vision. This comes from leadership, citizen engagement and technical input. Sense of place is not just physical it is social and economic. Place making is an evolutionary process – the professional role is about enabling the vision and about co-production. The opportunity is to take the Innovation Areas on to the next stage, to build on brand, the success and the energy that exists here and to maintain the reputation for innovative thinking and one of the most attractive places to work in Europe. In the words of one of the delegates, "We must find a suitably creative way to respond to the poetry of the Cambridge phenomenon."

97. Given that the WWTW are likely to remain on the site, certainly for the foreseeable future, then a high quality, mixed use, employment-led development of the area around a new transport interchange is the most appropriate use of this site. Responses to the conclusion in the summer also supported a mixed use or employment-led development on the site.
98. However, given that further work needs to be completed, and the recommendations coming through the workshop, a different document from the Local Plan will be the best place to do this. The Councils, working closely with the major players involved in this site, will develop an Area Action Plan. This Area Action Plan will look at the quantum of development, site capacity, viability, time scales and phasing of development. Planning applications will only be considered when the area action plan has been adopted. Officers are still discussing with SCDC on an AAP being the best approach.

Findings of the Sustainability Appraisal of the Cambridge Local Plan (July 2013)

99. The provision of a mixed use development at the Northern Fringe East should have a positive effect on the sustainability objectives related to economy, through the promotion of the sustainable growth of this area. Policy 14 should have positive effects in relation to biodiversity in that includes criteria related to the local nature reserve at Bramblefields, calling for the provision of appropriate ecological mitigation measures either on, or off-site if necessary.
100. The Northern Fringe Area of Major Change (**Policy 14**) is located to the north east of the area and seeks to deliver an employment-focused area centred around a new train station at the Cambridge Science Park. The area is allocated for high quality mixed use development, including employment uses such as B1, B2 and B8 uses as well as a range of supporting commercial, retail and residential uses, however the final quantum and distribution of uses will be determined through an Area Action Plan. Development in this area of Cambridge which contains the most deprived Super Output Areas in the city should deliver increase employment opportunities and lead to significant positive effects in terms of addressing deprivation in the North Cambridge Functional Area. Provisions within the policy requiring improvements to walking and cycling infrastructure should have significant positive effects in terms of encouraging public transport, walking and cycling whilst also increasing access to employment opportunities from more deprived parts of the city.
101. Policy 14 could be beneficial to Kings Hedges and Abbey Ward as it proposes 5.26ha² of “high quality mixed use development, including employment uses such as B1, B2 and B8 uses as well as a range of supporting uses, commercial, retail and residential uses” which could lead to employment opportunities on-site and improved access to employment in other areas via the busway and rail

² CLP Proposals Schedule Draft

station. Employment opportunities are likely to be of greater benefit to higher-qualified and skilled workers and less beneficial to residents of Kings Hedges and Abbey Ward due to the focus on research and high-tech sectors; although a mix of employment is envisaged including retail and other supporting sectors to the 'Cambridge Cluster' uses. Providing that King's Hedges and Abbey Ward are sufficiently connected to areas across the city they should be able to take advantage of the new job opportunities that the plan creates, which could lead to significant positive effects in terms of income and employment deprivation.

Key Issues raised during Proposed Submission consultation

Policy 14: Northern Fringe East and land surrounding the proposed Cambridge Science Park Station Area of Major Change	
Total Representations: 22	
Object: 14	Support: 8
Objections	<ul style="list-style-type: none"> • Amend allocation to be for residential <u>not</u> business uses; • Re criterion (d) – wording needs to be expanded to include other features of ecological importance, requiring both ecological compensation and enhancement measures as well as mitigation measures; • The current minerals and waste related operations and rail sidings located both within the area and on its perimeter should be fully safeguarded and not allowed to be adversely impacted by new development; • Inference in paragraph 3.31 related to noise and dust resulting from operating the sidings is not acceptable unless an equally viable operational area can be found as a part of the expense of the proposed development. The site is safeguarded for its current use and any proposals that could have a negative impact on its operation must be resisted; • Site drawn is too small - it should include all land to the east of the railway out to Fen Road; • Area shown should also include Cambridge Science Park; • Transport infrastructure must be rationalised – extension into Chesterton Fen must provide for all traffic and any southbound extension should follow the line of the A14 or railway line and not despoil Ditton Meadows or Stourbridge Common; • Policy is not in keeping with the NPPF as it does not give a clear indication as to how the decision maker will react to a proposal. It is not realistic and is not sufficiently flexible to allow for changes in the market or to allow reasonable alternatives to be considered. The policy should be reworded; • Production of an Area Action Plan would severely delay the development, generate an unwarranted onerous financial cost and an unnecessary administrative and time burden; • Boundary of the area needs to be amended to include the

	<p>triangular piece of land at the southern end of the site to allow for greater flexibility and certainty for the intended development proposals and to follow physical boundaries on the ground;</p> <ul style="list-style-type: none"> • The allotments at Nuffield Road should not form part of the development and need to be removed from Figure 3.3; • The area of the site should be extended to include the Milton Teardrop site on basis that the site may be required to help secure strategic highway improvements; • Support subject to amendment in relation to the footprint of the Waste Water Treatment Works (Environment Agency); • No evidence that the site is deliverable; it is premature to allocate the site when limited information is available on how the site will contribute to the development needs of either Cambridge or South Cambridgeshire; • The plan should include an expectation that the sidings and sewerage works will move out of the city; seeking to assist this process by identifying suitable alternative sites; • Should make specific reference to provision of pubs and student accommodation.
Support	<ul style="list-style-type: none"> • South Cambridgeshire District Council supports the proposals for a joint Area Action Plan, which has also been included in the Proposed Submission South Cambridgeshire Local Plan; • A critical area for the future of Cambridge; • Cambridge City Council Property Services Department supports high density, mixed-use employment led development here – Council owned land could form part of this redevelopment and is available for such development; • Comment - Anglian Water investment plans include upgrades to Cambridge Water Recycling Centre to provide capacity for the predicted growth to 2031. Should land become available as a result of this, alternative uses would still need to be restricted to compatible, less sensitive development and not residential; • Strong support for proposals to maximise development of brownfield land in highly sustainable locations.

Minor Modifications suggested following Proposed Submission consultation and implications for Sustainability Appraisal

102. No changes to Policy 14: Northern Fringe East and land surrounding the proposed Cambridge Science Park Station Area of Major Change or the supporting text are suggested in the Addendum to the Cambridge Local Plan 2014: Proposed Submission document. There are therefore no impacts on the findings of the Sustainability Appraisal.

Policy 15: South of Coldham's Lane

EXISTING POLICY TO BE REPLACED (CAMBRIDGE LOCAL PLAN 2006)	OPTION(S) BEING TAKEN FORWARD FROM THE ISSUES AND OPTIONS REPORT (2012) AND ISSUES AND OPTIONS 2 (2013)	OPTION(S) NOT BEING TAKEN FORWARD FROM THE ISSUES AND OPTIONS REPORT (2012)
Not applicable	<ul style="list-style-type: none"> • Option 40 South of Coldham's Lane 	Not applicable

Key issues raised during Issues and Options (2012) and Issues and Options 2 (2013) consultations:

SECTION OF THE ISSUES AND OPTIONS REPORT (2012)	KEY ISSUES ARISING FROM CONSULTATION
Option 40 South of Coldham's Lane	<p>ARGUMENTS IN SUPPORT OF THIS OPTION:</p> <ul style="list-style-type: none"> • Good to use land, which is otherwise wasted, for community purposes; • Good support for not using the site for housing; • This area of Cambridge would benefit hugely from a relaxing area such as this – it doesn't have much by the way of green space; • Would be an excellent family location; • Would boost the local economy; • Site would be safer with public controlled access than it is at present, with no control; • Very few opportunities to enjoy natural water resources near Cambridge – would be a valuable resource; • Helps encourage exercise and sport; • Support for further industrial and employment uses of the site too. <p>OBJECTIONS TO THIS OPTION:</p> <ul style="list-style-type: none"> • Site's wildlife and biodiversity needs protecting; • Dangerous site – cliffs; • Contaminated land issues; • Development on land 'west of Rosemary Lane' will compromise the efficiency of airport; • Increased anti-social behaviour; • Increased traffic to area; • Impact on Spinney School; • Cycle, walking and public transport routes need

SECTION OF THE ISSUES AND OPTIONS REPORT (2012)	KEY ISSUES ARISING FROM CONSULTATION
	improving.
NEW OPTIONS ARISING FOLLOWING COMMUNITY INVOLVEMENT	
No additional suggestions were put forward	

Evidence base:

- Mott MacDonald (March 1999). Blue Circle Site, Coldham's Lane: Review of Health, Safety and Environmental Hazards;
- Cambridge City Council (2012). Cambridge Local Plan – Towards 2031. Issues and Options Report;
- Environmental Protection Strategies Ltd. (May 2013). Environmental Assessment Report, Coldham's Lane Lakes,
- Cambridge City Council (2005). Cambridge City Wildlife Site Survey;
- Planning for Brownfield Biodiversity: A Best Practice Guide, by Buglife - The Invertebrate Conservation Trust;
- Birmingham BMX Club web site and related information to Perry Park BMX Track, Birmingham; and
- Cambridge City Council land ownership information, Property Services, Cambridge City Council.

How the policy came about:

103. This area has played an important role in the city’s industrial past as well as provided land for the construction materials and for waste disposal. Previous uses include quarrying for, and manufacture of, cement. Two quarries created from this activity were filled in during the 1970’s and 1980’s. Land between the two sites, now known as the Norman Way Business Park, have been developed into a mixed use area, including car showrooms, a hotel, a gym and warehousing. Parts of the area are also designated as City Wildlife Sites. South of an existing branch of the West Anglia rail line are three lakes, although recognised public access is permitted to them. Various public footpaths are located in and around the area.

104. In June 2012, the Council consulted on one option (Option 40) to regenerate the entire area to allow for improved recreational and site development opportunities. The option included the potential for a “green and blue” corridor” with, amongst other possibilities, recreational use of the easterly closed landfill site for non-motorised BMX cycling for example, improved pedestrian and cycling facilities, improved access to parts of the lakes, and options for uses on the easterly closed landfill site such as land to relocate commercial uses such as builders merchants sales and storage facilities currently located elsewhere in the city.

105. Consultation results showed there was strong support for an improved recreational focused strategy for the area. Representations noted that this would provide for improved, safer use and access to the area and provide a valuable local resource for residents, as well as provide a chance to improve the economy locally with the development of parts of the former land fill sites. Some concern was expressed over the option given the current conditions and safety of the area e.g. contaminated land and steep cliffs to the lakes.

106. The interim Sustainability Appraisal Report noted the following of this option:

This Option would contribute significantly to improving the health and well being of Cambridge residents by providing greater access to open space and opportunities for walking, cycling and sports activities. This Option will provide additional open spaces and green space and should help address the relatively high levels of health deprivation in this area because it has been inaccessible to the public. Redevelopment of this site should also contribute to increasing the attractiveness of the area. The extent to which this Option would have negative effects on biodiversity is uncertain, although the option is clear that biodiversity value would be considered before any development takes place. The eastern most site is designated as a City Wildlife Site; it is not clear whether redevelopment would have any adverse effects on biodiversity on this site. However, redevelopment could provide opportunities for improved conservation and a net increase in biodiversity, facilitated in part, through the proposal to develop a green and blue corridor through to the Spinney Nature Reserve.

107. The Interim Sustainability Appraisal went on to state the following:

The Opportunity Areas' focus on public realm improvements and recreational provision and are likely to result in significant positive benefits across a number of sustainability topic areas. In each of the areas the proposed improvements should result in a more accessible and attractive public realm and improved pedestrian and cyclists safety; thus helping promote greater uptake of these transport modes and reduce private car use. This will have benefits in terms of addressing key transport and climate change mitigation sustainability issues. There are likely to be economic benefits relating to improvements to shopping areas and tourism. In particular, specific improvements around the station will help present Cambridge as an attractive, sustainable and welcoming City helping maintain its position as a place to live work and visit.

108. The creation of a new recreation and commercial-led regeneration of the area will provide significant benefit to the immediate area and city as a whole. The National Planning Policy Framework, at paragraphs 69, 70, 73 and 75, promotes the development of policy in local plans which facilitate healthy communities and improved access, and provision of, recreational facilities. It also states at paragraph 19 that local planning authorities should "support economic growth through the planning system". The development of part of

the former landfill sites will support local economic growth and this policy is a fundamental tool to help deliver that economic growth.

109. It will be essential to the realisation of this policy that private/public sector input is contributed to help develop a realistic, comprehensive and visionary masterplan for the area. The piecemeal development and improvement of the area is not desirable, rather a phased or staged approach to the regeneration of the area based on an agreed comprehensive masterplan is needed which provides the necessary triggers, funding mechanisms and governance arrangements.

Findings of the Sustainability Appraisal of the Cambridge Local Plan (July 2013)

110. The Sustainability Appraisal found that this policy was likely to have positive effects on a number of sustainability themes. In relation to biodiversity, the requirements within the policy for new development to recognize existing sites of local nature conservation importance within and surrounding the site and implement appropriate ecological mitigation measures should have a positive effect. Requirements within the policy to establish recreational uses within the area, as well as access to jobs should help enhance community and wellbeing. There will be positive benefits in relation to the take up of sustainable transport as the policy makes provision for the upgrading of existing public routes to support increased pedestrian and cycle access to the proposed urban country park. The creation of this country park will also have significant positive effects in relation to open space provision.

Key Issues raised during Proposed Submission consultation

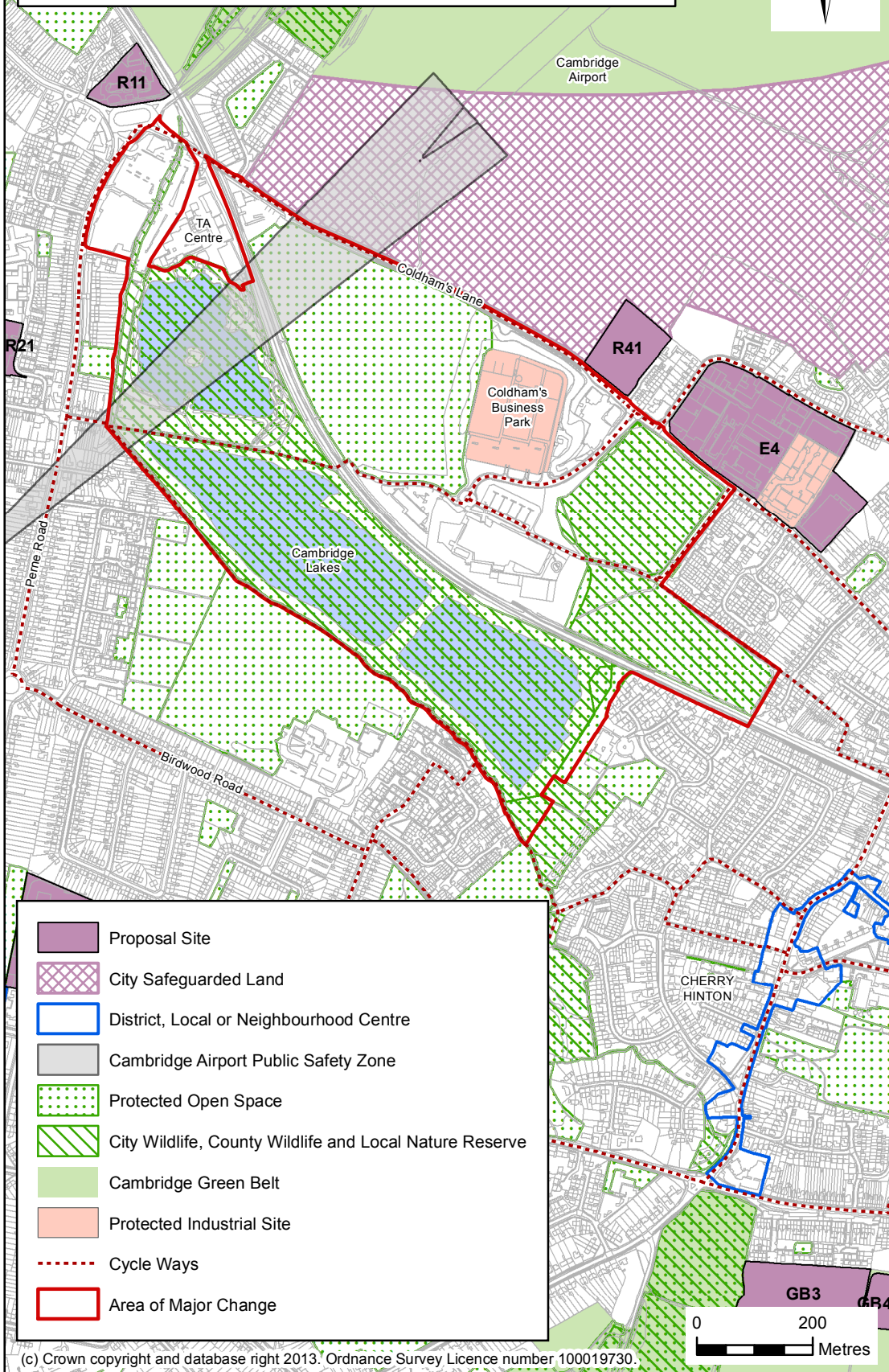
Policy 15: South of Coldham’s Lane Area of Major Change	
Total Representations: 59	
Object: 11	Support: 48
Objections	<ul style="list-style-type: none"> • Concern about impact on residential amenity and wildlife. Full consultation on any proposals must be undertaken with local residents; • There should be no new housing on the site; • Development on land directly on top of the landfill site is not appropriate; • Support the goals of the policy but wish for more clarity as to the financing of the masterplan and associated community consultation; • Include provision for a railway stop to serve the lakes and St Bede’s Secondary School; • The Wildlife Trust objects to any allocation that could lead to the loss of significant areas of habitat and part of a strategic infrastructure corridor / ecological network; • Bullet point g) needs to be enhanced to make reference to the

	<p>need for ecological compensation and enhancement measures;</p> <ul style="list-style-type: none"> • Support for the proposals – Figure 3.4 needs to be updated to show the location of existing pedestrian and cycle routes to be retained, upgraded and connected; • Criteria (e) and (g), access and conservation are in conflict with one another; • The Anderson Group is fully supportive of the aspirations portrayed in the policy. It is though important to allow for a degree of flexibility in terms of land uses on the eastern part of the site (north of the railway line) in order to ensure these aspirations are economically viable. Endorse a strategy that seeks to utilise this area as a receptor for non-conforming commercial uses currently located within the city centre. This will in turn release previously developed land within the urban area for more appropriate redevelopment to meet the council’s aspirations and strategies; • Figure 3.4 continues to show the eastern part of the site as protected open space, rather than the commercial redevelopment potential acknowledged by the policy.
Support	<ul style="list-style-type: none"> • Will have a positive impact on the living environment of the whole of East Cambridge and will help to make the area, which is already used for swimming, safer for all users; • Good opportunity to enhance wildlife in the area. One lake could be designated as a wildlife reserve; • Strong support for non-motorised water sports on the lake; • Sainsbury’s supports the policy and seeks to safeguard its current interests in the land, should no alternative site come forward to relocate its Coldham’s Lane store to within the plan period.

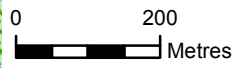
Minor Modifications suggested following Proposed Submission consultation and implications for Sustainability Appraisal

111. As a result of assessment following consultation, one minor modification was suggested for Figure 3.4: South of Coldham’s Lane Area of Major Change. This change is in the Addendum to the Cambridge Local Plan 2014: Proposed Submission document marked as PM/3/004. The change was made for clarity and involves changing the colour of the cycleways so they are more visible on the figure. The amended figure can be seen overleaf.
112. Following consideration of the impact of this change on the Sustainability Appraisal Framework, it has been concluded that this change does not materially alter the findings of the Sustainability Appraisal.

Figure 3.4: South of Coldham's Lane Area of Major Change



- Proposal Site
- City Safeguarded Land
- District, Local or Neighbourhood Centre
- Cambridge Airport Public Safety Zone
- Protected Open Space
- City Wildlife, County Wildlife and Local Nature Reserve
- Cambridge Green Belt
- Protected Industrial Site
- Cycle Ways
- Area of Major Change



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Policy 16: Cambridge Biomedical Campus (including Addenbrooke's Hospital)

EXISTING POLICY TO BE REPLACED (CAMBRIDGE LOCAL PLAN 2006)	OPTION(S) BEING TAKEN FORWARD FROM THE ISSUES AND OPTIONS REPORT (2012) AND ISSUES AND OPTIONS 2 (2013)	OPTION(S) NOT BEING TAKEN FORWARD FROM THE ISSUES AND OPTIONS REPORT (2012)
<ul style="list-style-type: none"> • Policy 5/15 Addenbrooke's • Policy 9/5 Southern Fringe 	Option 30 Addenbrooke's Hospital	Not applicable

Key issues raised during Issues and Options (2012) and Issues and Options 2 (2013) consultations:

SECTION OF THE ISSUES AND OPTIONS REPORT (2012)	KEY ISSUES ARISING FROM CONSULTATION
Option 29: Southern Fringe	<ul style="list-style-type: none"> • Mostly support for the option; • Some support for the retention of land for the purpose of expansion of Addenbrooke's including its important role for the economy and provision of local jobs; • There should be a limit on Addenbrooke's expansion, and on the release of Green Belt land for housing, if the character of this area is not to be irretrievably damaged. • no evidence that Addenbrooke's plans have got to grips with the parking problem that affects the whole local area around Addenbrooke's.
Option 30: Addenbrooke's Hospital	<ul style="list-style-type: none"> • Mixed views on Option although most in favour; • Significant numbers saying that the development of Addenbrooke's as a centre of excellence is vital and its ability to expand should not be constrained; • Critical to the economy; • Danger of 'over-concentration' of medical resources on the site - exacerbated by proposal to move Papworth into it – want more dispersed local provision away from Addenbrooke's to cut journey times, a second hospital or specialist centres with in-patient facilities. Growth in population increases need; • Policy should be expanded to take account of impact

SECTION OF THE ISSUES AND OPTIONS REPORT (2012)	KEY ISSUES ARISING FROM CONSULTATION
	<p>on neighbouring areas and be a more balanced approach to the benefit of local people;</p> <ul style="list-style-type: none"> • The biodiversity contributes to the character of these areas; • Campus is too large already, putting a strain on physical and social structure of the southern side of the city; • Designation of additional land should be made now - the hospital's expansion is intended to be complete by 2020; • Addenbrooke's site is very large already, and should not be allowed to expand further. Time to stop development. Return to Green Belt; • Land should be released over several phases rather than in one go; • Research is important, and economically necessary, but clinical provision adequate for the local community is paramount, bearing in mind that for many specialist fields the catchment area is region-wide. Concern balance of floorspace is too much towards biotechnology research, • Addenbrooke's has some of the ugliest buildings in Cambridge. Better design would enhance the patient experience considerably, as would attractive views from the wards. A design code and masterplan is needed for Addenbrookes bio-medical campus. While Molecular Biology laboratory is of an appropriate enough design, it is a stand-alone building, surrounded by car parks, and not enough thought to its public face. Poor urban design makes it less good than it could have been; • With the large number working and visiting the Addenbrooke's site, there should be a much enhanced retail/café/pub provision so people don't have to travel elsewhere to relax; • Well-designed public spaces are essential - think small gardens, green corridors and urban squares. Vehicles are not conducive to health and well-being so should be minimised. A hospital should be more of a place to get better, less like a factory; • Transport routes to and around the Addenbrooke's site, particularly for those on bicycles - staff, visitors and patients - need attention. Many factors hinder

SECTION OF THE ISSUES AND OPTIONS REPORT (2012)	KEY ISSUES ARISING FROM CONSULTATION
	<p>access by bicycle, including discontinuities in cycle routes to the area, lack of crossings, and totally inadequate cycle parking. Cycle parking needs to be provided at every building, so that staff, patients and visitors can park at their destination. City's cycle parking standards need improving;</p> <ul style="list-style-type: none"> • Public transport is inadequate; the bus stops are a 15-20 minute walk from some parts of the hospital site; the local roads cannot cope with growth. Inadequate parking for staff and patients. Affordable and practical parking needs to be available on the site for staff and visitors; • Open up the new Addenbrooke's Road so that it can be used by all members of the public. Remove speed bumps and create an "Ambulance only" lane.
Option 153: Additional hotel provision	<ul style="list-style-type: none"> • Support the policy for at least 2,000 additional bedrooms in the city, but add some flexibility for the location within Addenbrooke's;
NEW OPTIONS ARISING FOLLOWING COMMUNITY INVOLVEMENT	
The option was renamed to reflect the broader vision for the Cambridge Biomedical Campus including Addenbrooke's Hospital.	

Evidence base:

- Cambridge University Hospitals NHS Foundation Trust, 2020 Vision at Addenbrooke's – The future of the hospital campus – update July 2004
- Cambridge University Hospitals NHS Foundation Trust, Strategic Masterplan – Cambridge Biomedical Campus (2010)
- Cambridge University Hospitals NHS Foundation Trust, Vision to Reality: 21st Century Patient Care at Cambridge University Hospitals (2010)
- Cambridgeshire County Council and Peterborough City Council, Cambridgeshire and Peterborough Minerals and Waste Core Strategy (July 2011)

Notable developments at the Campus include:

- Full application for the Medical Research Council Laboratory of Molecular Biology (07/0851/FUL)
- Outline application for 215,000m² of Clinical and Biomedical Research and Development, Clinical Treatment of Higher Education or sui generis medical research institute uses (CBC 06/0796/OUT)
- Reserved matters application for Southern Access Road (12/1304/REM)
- Reserved matters application for Multi-storey car park (11/0780/REM)
- Full application for an Energy / Innovation Centre (C/5009/12/CW)

- Outline (06/1279/OUT) and Renewal (10/1209/EXP) applications for Learning Centre, Seminar Conference Centre and Hotel (The Forum)

How the policy came about:

113. The spatial strategy in the Cambridge Local Plan 2006 allowed for land to be removed from the Green Belt to facilitate the expansion of Addenbrooke's Hospital as a regional hospital and centre of excellence for associated medical and biotechnology research and development activities, related higher education or research institutes. It included:
- Policy 5/15 that set out the type of development to be permitted at Addenbrooke's;
 - the allocation of site 9.02 for clinical development and research uses as defined in policy 9/5; and
 - the safeguarded site 9.09 for future clinical development and research uses post 2016.
114. Policy 16 brings these policies and allocations together to encourage a comprehensive approach to and support for the continued development of this biomedical and biotechnology cluster. In looking ahead to 2031, the development of this area will continue to be a key component of the spatial strategy for Cambridge.
115. The planning status of the Cambridge Biomedical Campus is as follows:
- The Medical Research Council Laboratory of Molecular Biology has been completed and full occupation is anticipated in summer 2013 (07/0851/FUL).
 - Outline approval was granted for 215,000m² of Clinical and Biomedical Research and Treatment in 2009 on the signing of the S106 agreement (CBC 06/0796/OUT).
 - Infrastructure: Reserved matters have been approved for the southern access road and a multi-storey car park.
 - Papworth: Two developers have prepared bids for the relocation of Papworth Hospital. Responses have been given to pre-application submissions from these.
 - Energy/Innovation centre: A full application has been submitted to the Cambridgeshire County Council for a new clinical waste facility to replace the existing facilities and to serve the Cambridge Biomedical Campus.
 - The Forum: Outline permission was renewed in 2011 for a learning centre, seminar/conference centre, and a hotel. The Trust has selected a partner to take this forward to also include a private hospital. Responses have been given to pre-application submissions from this partner and another short listed partner. This proposal will be taken forward as a full application.

116. The outline application for the campus was submitted by a consortium including the Trust, Countryside Properties and Liberty Property Trust, now Cambridge Medipark Ltd. The Pembertons hold the freehold of this land and the safeguarded land to the south. The Trust has an option to develop one third of the land, and the Medipark two thirds. There have been no definite proposals for the commercial medical and biotechnology research progress on the CBC due to the effects of the recession when it took hold in 2008. However, Cambridge Medipark Ltd has outlined significant commercial interest in 2013, which is expected to come forward by 2020. They therefore anticipate needing to bring forward the safeguarded land along the southern edge of the site within the plan period.
117. The Cambridge University Hospitals NHS Trust (the Trust) has prepared The 2020 Vision as part of their strategic masterplan. This includes the ambition that Addenbrooke's will become the best biomedical campus in Europe, while also serving an increasing local population. The masterplan completed in 2010 covers the expanded Cambridge Biomedical Campus area. It is used as a resource by the Trust and informs developments of areas as proposals come forward. It is updated to reflect changes as they are agreed and to take into account revised programmes. The previous policy included the requirement for development to be in accordance with an agreed site masterplan. However, given nature of the masterplan, the role of the Trust and the complexities of preparing and agreeing such a document it is not appropriate for this to be formally approved by the council and this requirement has been removed.
118. The council will continue to work closely with the Trust as the masterplan is updated. There is also regular dialogue with Cambridgeshire County Council and South Cambridgeshire District Council on transport and other matters related to the campus.
119. Policy 16 is considered to be in conformity with the requirements of the National Planning Policy Framework in that it provides a positive strategy for the continued development of the Cambridge Biomedical Campus, securing economic growth to create jobs and prosperity. Development in this area is a key element of the spatial strategy for Cambridge, and the policy represents a positive strategy for the promotion and expansion of the biomedical cluster that has developed around Addenbrooke's Hospital.
120. As part of the Issues and Options (2012) consultation, the council consulted on two options relevant to Addenbrooke's Hospital and the wider area:
- A specific policy for the Southern Fringe including the expansion of Addenbrooke's hospital as a regional hospital and centre of excellence for associated medical and biotechnology research and development activities, related higher education or research institutes will continue to be a key component of the spatial strategy to 2031 (option 29).

- To continue to have a specific policy for Addenbrooke's to ensure that it continues to provide clinical services to meet local, regional or national health care needs and develops as a centre of research (option 30).
121. In responding to this consultation, Cambridgeshire and Peterborough NHS Foundation Trust supported Option 29, and the development of a specific policy for the expansion of Addenbrooke's Hospital and associated medical and biotechnology research and related development in this area. They requested that the same quantum of land in the 'reserve area' be retained for clinical services and biomedical research uses. The Cambridge Local Plan 2006 seeks to protect employment land for businesses that require a Cambridge location and support Cambridge Phenomenon. The retention of a 'reserve area' would support the aims of this strategy. It was suggested that a masterplan could define the parameters for the density and height of buildings within the 'reserve area' to minimise the visual impact of additional buildings on the Green Belt and surrounding landscape.
 122. The Trust also supported Option 30, which sought to ensure that Addenbrooke's continues to provide clinical services to meet local, regional and national health care needs and develops as a centre of research. The protection of Addenbrooke's and the allocation of further land at the site provide the rationale for associated health related development in the area.
 123. Cambridge University Hospital NHS Foundation Trust also welcomed and supported the recognition that was given in the Issues and Options Report to the importance of the hospital and the biomedical campus, and that specific policies will be included in the Local Plan going forward. Given that the hospital is part of the wider campus, CUH they suggested that the "Addenbrooke's" policy be widened to be a policy for the Cambridge Biomedical Campus recognising the full range of functions that it encapsulates. CUH considers that a very long term perspective should be taken towards the campus' expansion.
 124. Cambridge Medicare Ltd (Countryside Properties (Special Projects) Ltd) considered that to deliver a more holistic approach, consideration should be given to a policy on the Cambridge Biomedical Campus as a whole, including Addenbrooke's, rather than just Addenbrooke's. The commercial development comprising 'biomedical and biotechnology research and development activities within Class B1(b), related support activities, related higher education and sui generis medical research institutes' (Cambridge Local Plan 2006 Policy 9/15 f) is also a key part of this internationally important campus and should not be divorced from the clinical function.
 125. The University of Cambridge considered that the policy for the expansion of Addenbrooke's to form the Cambridge Biomedical Campus should be retained. The Campus is a leading centre for academic and clinical research. The campus is home to the University's School of Clinical Medicine. Other occupiers

include the Cambridge University Hospitals NHS Foundation Trust, the Cancer Research UK Cambridge Research Institute, the Hutchison/MRC Research Centre, and the MRC Laboratory of Molecular Biology (LMB). This enables excellence in medical research to be connected with practical paths to its application. Major expansion of the campus is already coming forward.

126. More broadly the consultation also identified the following key issues which received most interest and comment, and which are relevant to this site and for consideration in the development of the policy:

- Mixed support for further development in the Green Belt. Many respondents made the point that the Green Belt should be protected (whilst the site is not within the Green Belt it does abut it);
- Support for being ambitious in relation to climate change and water related policies although concern about viability and implementation;
- Support for options relating to design, historic environment, landscape and biodiversity;
- Mixed support for options relating to density, tall buildings, space standards;
- Support for employment provision although concern about the lack of land for provision;
- Support for local, independent shops and diversity in centres;
- Support for continued emphasis on non car modes; and
- Support for the option relating to timely provision of infrastructure.

127. The Interim Sustainability Appraisal Report of these options stated;

“Continuing to support the development of the southern fringe through the spatial strategy will maintain the sustainability benefits associated with addressing levels of deprivation and mitigating flood risk through improved drainage. The continued support for the creation of the Cambridge Biomedical Campus has a range of positive implications in terms of sustainability. Most importantly it will provide a cluster of healthcare, bio-medical and bio-technical research, and high-education uses. The ambition is for the cluster to be at the leading edge of health-care expertise. It will therefore have a significant positive impact on the local economy and will also provide excellent health care facilities for Cambridge residents.”

128. The responses and Sustainability Appraisal shows broad support to a continuation of the policy approach. Policy 16 in the draft Cambridge Local Plan 2014 therefore seeks to:

- Recognise the significance of the Cambridge Biomedical Campus to the City and region, in terms of its continued excellence and needs across its varied components, including:
 - a. Clinical
 - b. Research and development

- c. Educational
 - d. Support services and facilities, including housing, transport, retail and leisure
- Safeguard the very long-term expansion potential of the cluster; and
 - Avoid constraining this potential.
129. A long term perspective to 2031 and beyond should also be taken towards the campus' expansion. The Cambridge Local Plan 2006 safeguarded land for development beyond 2016. It appears likely that the biomedical campus will be fully developed by the end of the decade and therefore positive consideration has been given to the safeguarded land being allocated, for development later in the plan period.
130. The aims of the previous policies for Addenbrooke's and the Southern Fringe have been carried forward and the policies superseded by Policy 16. This results in a clear approach that provides the certainty but the flexibility necessary to support and encourage the development of Addenbrooke's Hospital as one of the largest and most internationally competitive concentrations of health-care related talent and enterprise in Europe. This will help to deliver growth that will support Cambridge as a centre of excellence in research and a world leader in research while also supporting a diverse economy.

Findings of the Sustainability Appraisal of the Cambridge Local Plan (July 2013)

131. The findings of the Sustainability Appraisal of the draft Cambridge Local Plan undertaken in July 2013, were that Policy 16 would lead to significant positive effects in terms of:
- i. New development at Addenbrooke's Hospital being 'future proofed' for potential future connection to the network, which could further lessen emissions through delivering low carbon heating;
 - ii. The landscaping and buffer areas leading to biodiversity benefits;
 - iii. Protecting and enhancing the historic character of areas in the city that are expected to face major development change over the lifetime of the plan;
 - iv. The existing watercourse in the Cambridge Biomedical Campus area being retained and integrated by new development;
 - v. Requiring new development to demonstrate they will meet local, regional or national health care needs;
 - vi. Providing new employment opportunities for more deprived areas in the east of the Functional Area; and
 - vii. Requiring improvements to walking and cycling infrastructure, and specifically extending conventional bus services to meet the needs of the resident and working population, linking to the Cambridge Busway, Park and Ride and ensuring transport links between different Areas of

Major Change which should all encourage use of public transport, walking and cycling whilst also increasing access to employment opportunities from more deprived parts of the city.

Key Issues raised during Proposed Submission consultation

Policy 16: Cambridge Biomedical Campus (including Addenbrooke’s Hospital) Area of Major Change	
Total Representations: 10	
Object: 6	Support: 4
Objections	<ul style="list-style-type: none"> Concerned about the emissions associated with the energy centre and potential for waste to be imported for incineration; Update supporting text to reflect that permission for the Energy Innovation Centre has now been granted; (Cambridge Medipark Limited): Reference should be made to additional uses such as specialist care homes; (Cambridge Medipark Limited): There should be more flexibility in the policy to allow for provision of office space, potentially even standalone buildings, as long as they are adjacent to associated research facilities. Policy should also allow for a wider range of uses in order to support staff and visitors including A2 (financial and professional services) and A5 (hot food take-aways); (Cambridge Medipark Limited): It is not appropriate to make reference to a landscape buffer of at least 20 metres being required along the southern boundaries. Not in keeping with other area policies. More appropriate wording would be “an appropriate landscaped edge”.
Support	<ul style="list-style-type: none"> University of Cambridge capital building projects are planned for development at this site, and as such the policy support for such developments is welcomed; Cambridge and Peterborough NHS Foundation Trust welcomes this policy as it enables potential occupiers to compete effectively for sites that are suitable for their operations and helps to reduce competition from alternative uses for scarce land. We request that no changes are made to the policy and supporting text.

Minor Modifications suggested following Proposed Submission consultation and implications for Sustainability Appraisal

132. Two amendments were suggested following assessment as a result of consultation. These changes are in the Addendum to the Cambridge Local Plan 2014: Proposed Submission document marked as PM/3/005 and PM/3/006.

133. PM/3/005 is suggested in response to a representation (Representation Number 28254) and in order to use appropriate terminology. This amendment to criterion (e) of Policy 16 reads:

“e. include provision for the extension of existing conventional bus services, the Cambridgeshire Busway and Park and Ride services to meet the needs of the resident and working populations, including disabled people ~~with disabilities~~; and”

134. PM/3/006 is suggested to paragraphs 3.48 and 3.49 in response to representations (Representation Numbers 27325 and 27744) and in order to reflect the current position regarding planning permission and implementation. These amended paragraphs read:

“3.48 **Energy centre:** Addenbrooke’s Hospital has identified the need for a new clinical waste facility (energy from waste) to replace the existing facility. In response, the Cambridgeshire and Peterborough Minerals and Waste Core Strategy (July 2011) made a strategic site specific allocation for the replacement clinical waste facility (Policy CS19, area of search site W2). It also provided a waste consultation area around this to protect the site allocation (Policies CS19 and CS30). The area of search and the waste consultation area are shown on the policies map. An application has been ~~submitted to~~ approved by Cambridgeshire County Council for an energy innovation centre (energy from waste facility) within the site allocation.

3.49 ~~If this is permitted,~~ This will allow Addenbrooke’s Hospital ~~will to~~ benefit from an energy innovation centre and energy network serving the Cambridge Biomedical Campus as a whole. Developments within the site should, therefore, seek to connect to this energy network, subject to feasibility and viability. A benefit is that it can provide developers with a cost-effective way to meet the carbon reduction requirements sought by the local plan.”

135. Following consideration of the impact of these changes on the Sustainability Appraisal Framework, it has been concluded that these changes do not materially alter the findings of the Sustainability Appraisal.

Policy 17: Southern Fringe

EXISTING POLICY TO BE REPLACED (CAMBRIDGE LOCAL PLAN 2006)	OPTION(S) BEING TAKEN FORWARD FROM THE ISSUES AND OPTIONS REPORT (2012) AND ISSUES AND OPTIONS 2 (2013)	OPTION(S) NOT BEING TAKEN FORWARD FROM THE ISSUES AND OPTIONS REPORT (2012)
Policy 9/5 Southern Fringe	Option 29 Southern Fringe	Not applicable

Key issues raised during Issues and Options (2012) and Issues and Options 2 (2013) consultations:

SECTION OF THE ISSUES AND OPTIONS REPORT (2012)	KEY ISSUES ARISING FROM CONSULTATION
Option 29: Southern Fringe	<ul style="list-style-type: none"> • Mostly support for the option; • Trumpington Residents' Association and Great Shelford Parish Council supports Option 29 and the need for a policy for the Southern Fringe including the updating of the Area Development Framework to reflect the new Local Plan and Localism. We stress the importance of integrating the agreed developments into a single enlarged community and continuing the policy of community cohesion, while also preserving the historic centre of Trumpington; • Trumpington has more than its fair share of development now. Further expansion would be disastrous, overtaxing the somewhat fragile infrastructure as well as ruining the Green Belt which is essential to preserve the setting of the city; • The needs of local residents need to be considered. The key issue is to provide the facilities to create vibrant and dynamic communities - small shops, children's play areas, work-live units, mixed developments, green spaces to kick a football, community meeting rooms and the like; • The policy should ensure that the new communities are viable and are properly resourced for transport, education etc. The new communities should not detrimentally impact on existing communities immediately outside the city boundary; • A greater commercial/employment presence on Clay Farm etc should be encouraged. The policy should be given greater force than the existing Area

SECTION OF THE ISSUES AND OPTIONS REPORT (2012)	KEY ISSUES ARISING FROM CONSULTATION
	<p>Development Framework and the developers should be held more strictly to the Masterplan;</p> <ul style="list-style-type: none"> • Every effort should be made to maximise the use of space on the site; • There is a danger of the corridor into Cambridge, which is an already busy access route, being completely overwhelmed; • The city is already gridlocked for much of the day. More traffic from these new developments and every other planned developments will add to this. • The Development committee should continue to oppose the dreadful junction arrangements that the Bell School developer is attempting to force through. The cumulative effect of poor transport and planning decisions like this is shown all around the city.
Para 7.16: Delivering High Quality Places	<ul style="list-style-type: none"> • It would be prudent to undertake a review of the success of the design codes at the Southern Fringe before adopting them more widely.
Option 176: New community facilities Option 177: The provision of community facilities through new development	<ul style="list-style-type: none"> • Relocation of hospice to Southern Fringe;
NEW OPTIONS ARISING FOLLOWING COMMUNITY INVOLVEMENT	
No additional options have been suggested.	

Evidence base:

- Cambridge City Council, Southern Fringe Area Development Framework (2006)
- South Cambridgeshire District Council, Cambridge Southern Fringe Area Action Plan (2008)

Trumpington Meadows

- Outline approved for 1,200 dwellings (Ref: 08/0048/OUT City Council, S/0054/08/O South Cambridgeshire)

Glebe Farm

- Full application approval for 286 dwellings (09/1140/FUL)

Clay Farm

- Outline approved for up to 2,300 dwellings (07/0620/OUT)

Bell School

- Outline approval for 347 dwellings (06/0795/OUT)

There have been a number of other detailed applications for reserved matters approvals.

How the policy came about:

136. The Southern Fringe was allocated for residential development in the Cambridge Local Plan 2006 (see Policy 9/5). This was part of a strategy for sustainable growth close to the city. The Southern Fringe Area Development Framework was approved by the City Council in 2006 as detailed policy guidance. It has informed the consideration of planning applications, particularly in relation to the provision of education and community facilities.

137. In looking ahead to 2031, the development of this area continues to be a key component of the spatial strategy for Cambridge with sustainable growth close to the city's edge. The Local Plan Review and related work on the Strategic Housing Market Assessment has identified the need for 14,000 houses. The large existing allocations on the fringe of the city are expected to deliver over 6,000 homes of which the Southern Fringe is planned to provide approximately 3,000 homes within the city.

138. Policy 17 outlines how the site will be delivered over the plan period. Development of the Southern Fringe is in the process of being implemented with the approval of the outline applications and the implementation of reserved matters and full applications. Policy for the Southern Fringe contained in the Cambridge Local Plan 2006 has been reviewed and updated to take account of the latest position.

139. Trumpington Meadows and Clay Farm received outline planning permission in 2009 and 2010 respectively. The Trumpington Meadows proposals crossed the boundary with South Cambridgeshire and therefore were a joint application approved by Cambridge City Council and South Cambridgeshire District Council. Reserved matters approvals have followed on for part of both sites. Bell School and Glebe Farm were also granted full planning permission in 2010.

140. The capacity of approximately 3,300 homes is made up of:

- **Clay Farm:** Outline approval is for up to 2,300, with the S106 including a clause restricting this to a maximum of 2,250. However, in the reserved

matters applications that have been approved it has not been found possible to achieve the numbers envisaged. On this basis the likely capacity is 2,100;

- **Trumpington Meadows:** Outline approval is for up to 600 in the City. The first reserved matters for 353 dwellings indicate that it could be possible to reach this number;
- **Glebe Farm:** Full permission has been granted for 286 dwellings for the majority of the site.;
- **Bell School:** 280. Outline approval has been granted for up to 347 dwellings. Pre-application discussions on an alternative proposal have indicated fewer dwellings will come forward.

Related sites

141. Policy 17 has been developed in tandem with the ongoing preparation of the Strategic Housing Land Availability Assessment (SHLAA), which has been updated on a regular basis. The following site allocations that have arisen as a result of this work, while outside the Southern Fringe policy area are important because of their close relationship with the area:

- Site R15 – Glebe Farm East (Glebe Farm 2 within R24c). This site lies within the Southern Fringe Area of Major Change policy and will derive access directly from the main Glebe Farm development.; and
- Site R16 – Cambridge Professional Development Centre, Paget Road. This policy is of relevance to this site, particularly the improvement of pedestrian and cycle links to Clay Farm. There should be no vehicular access from this site to Clay Farm site.

142. The national objectives contained within the National Planning Policy Framework promote economic development as the key driver for the UK, therefore having a clear supply of housing land available for development will be crucial to the city. The key issues for the growth of the city are in facilitating the continued economic growth of the Cambridge and meeting the demands for market, affordable, key worker and student housing.

143. Although progress slowed just as sites were coming forward, due to the effects of the recession when it took hold in 2008, over the last year housing development has got underway on the large sites on the edge of Cambridge. This includes Clay Farm, Glebe Farm and Trumpington Meadows in the Southern Fringe, and on Huntingdon Road as part of the larger NIAB site. Progress is also being made in relation to the Station area, Cambridge Biomedical Campus (including Addenbrooke's Hospital), and the University site at North West Cambridge.

144. The housing market in Cambridge remains strong, with continued demand and high prices and high densities consistently achieved. There is therefore a strong case that the housing completions rate will continue and even

accelerate over the first part of the plan period and the Southern Fringe is well placed to delivery this growth. Development is well on the way on three of the four areas that make up the Southern Fringe with around 500 new dwellings due to be occupied by the end of 2013.

145. Policy 17 is considered to be consistent with the requirements of the National Planning Policy Framework in that it provides guidance on large-scale housing development in this area, which will contribute to meeting the objectively assessed housing need of the area, helping to secure economic growth and creating jobs and prosperity. The policy promotes a mix of uses for day-to-day activities, including the provision of schools and other local services and facilities.
146. As part of the Issues and Options (2012) consultation, the council consulted on the proposal for development of a specific policy for the Southern Fringe area. The comments showed broad support to a continuation of the policy approach and have been taken into account in the formulation of the Local Plan policies.
147. The Interim Sustainability Appraisal Report of these options noted that continuing to support the development of the southern fringe through the spatial strategy will maintain the sustainability benefits associated with addressing levels of deprivation and mitigating flood risk through improved drainage.
148. To conclude, the responses to Issues and Options consultation and the Sustainability Appraisal shows broad support to a continuation of the policy approach. The Southern Fringe is still very much needed to support the economic and housing growth of the city and the resolutions and ongoing discussions are a strong sign that this large area will continue to come forward within the plan period. The policy has therefore been updated to reflect the latest guidance and best practice.

Findings of the Sustainability Appraisal of the Cambridge Local Plan (July 2013)

149. The findings of the Sustainability Appraisal of the draft Cambridge Local Plan undertaken in July 2013, were that Policy 17 would lead to significant positive effects in terms of
 - i. Creating successful communities through seeking to deliver high quality new neighbourhoods for Cambridge, community infrastructure, education, local shopping and services, and open space and recreation;
 - ii. Requiring improvements to walking and cycling infrastructure, and specifically extending conventional bus services to meet the needs of the resident and working population, linking to the Cambridge Busway, Park and Ride and ensuring transport links between different Areas of Major Change which should all encourage use of public transport,

- walking and cycling whilst also increasing access to employment opportunities from more deprived parts of the city;
- iii. The landscaping and buffer areas leading to biodiversity benefits; and
 - iv. Provision of community facilities, education facilities, local shopping & services, and open space and recreation with potential benefits on the community and wellbeing.

Key Issues raised during Proposed Submission consultation

Policy 17: Southern Fringe Areas of Major Change	
Total Representations: 37	
Object: 30	Support: 7
Objections	<ul style="list-style-type: none"> • Concerned about transport implications. Priority must be given to buses and cyclists at all junctions; • Plan will not adequately provide for Cambridge’s housing needs and additional Green Belt at Broad Location 5 (land south of Addenbrooke’s Road) should be released; • Concern regarding water resources and availability of supply; • Include provision for a railway between Cambridge and Trumpington as part of the Oxford to Cambridge East West Rail Link (Railfuture East Anglia); • All elements relating to Appendix D (Southern Fringe Area Development Framework) need updating as this document is at least 7 years out of date; • Greater need for family houses rather than high density blocks of flats; • Needs firmer commitment to high quality routes for pedestrians and cyclists that are more attractive than routes for cars; • The outstanding need for a Household Recycling Centre (HRC) to serve Cambridge South needs to be addressed (Cambridgeshire County Council); • English Heritage have concerns as to the reference to the creation of a ‘distinctive gateway’ (g) given the sensitive nature of this area; • Criterion (h) does not provide access for all users (including horse riders); • Need to protect the horizons of Grantchester Meadows.
Support	<ul style="list-style-type: none"> • Essential to build new houses in order to stabilise prices while incomes catch up; • The balance between homes, community, health and educational facilities, open spaces and local shops will enhance

	<p>the established area and result in a well-integrated enlarged community of Trumpington;</p> <ul style="list-style-type: none"> • Support retention and enhancement of the strategic green corridor which extends from the Chalk Hills to Long Road and along the Vicar’s Brook/Hobson’s Brook corridor and retaining the character of the two watercourses.
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Minor Modifications suggested following Proposed Submission consultation and implications for Sustainability Appraisal

150. As a result of assessment, a minor modification is suggested for Policy 17, criterion (g). This change is in the Addendum to the Cambridge Local Plan 2014: Proposed Submission document marked as PM/3/007. This change is suggested in response to a representation (Representation Number 27395) and to ensure that the importance of a defensible landscaped urban edge is highlighted. This change reads:

“g. create a distinctive gateway to the city and a high quality urban edge as approached by road from the south and respect key views;”

151. Following consideration of the impact of this change on the Sustainability Appraisal Framework, it has been concluded that this change does not materially alter the findings of the Sustainability Appraisal.

Policy 18: West Cambridge

EXISTING POLICY TO BE REPLACED (CAMBRIDGE LOCAL PLAN 2006)	OPTION(S) BEING TAKEN FORWARD FROM THE ISSUES AND OPTIONS REPORT (2012) AND ISSUES AND OPTIONS 2 (2013)	OPTION(S) NOT BEING TAKEN FORWARD FROM THE ISSUES AND OPTIONS REPORT (2012)
<ul style="list-style-type: none"> • Policy 7/6 West Cambridge, South of Madingley Road; • Site Allocation 7.06 	Option 32 West Cambridge	Not applicable

Key issues raised during Issues and Options (2012) and Issues and Options 2 (2013) consultations:

SECTION OF THE ISSUES AND OPTIONS REPORT (2012)	KEY ISSUES ARISING FROM CONSULTATION
Option 32: West Cambridge	<ul style="list-style-type: none"> • In general, a policy for the site is largely supported; • Important as a key component of the city's Spatial Strategy to 2031 and to maintain the University's highly regarded place in the 21st century, and to provide jobs; • Need to ensure some 'vision' is retained and that a high standard of architectural design is achieved; • Some saying employment would support more intense development, but others say only if the need for extra employment is proven; • Further university development also a reoccurring theme in support of the policy; • Although this area contains dwellings, it lacks community facilities - no pub, no shops, no church for miles. Occupants have good reason to feel isolated. Once the NIAB site is complete, how will its facilities serve the West Cambridge occupants? The 3 projects in N and NW Cambridge are being looked at too much in isolation of each other; • West Cambridge could be improved further with the appointment of a design champion and a well-designed masterplan. The existing site is geared far too heavily for car use, and outside of working hours, the area feels like a desolate wasteland. Why are there not more shops, restaurants and public exhibition galleries? Why is so much potentially useful space wasted on car parking? • Sports provision should be concentrated at this site which can provide an integrated development; • Sufficient affordable housing must be provided for non-academic supporting population. Developers should be held closer to the Masterplan; • Should not be for residential development as infrastructure does not exist to support it; • Better to densify and maximise the use of this site than build elsewhere on Green Belt or other protected open spaces; • The Masterplan should be revised to intensify future development with infill where feasible and focus academic uses on eastern part closer to main

SECTION OF THE ISSUES AND OPTIONS REPORT (2012)	KEY ISSUES ARISING FROM CONSULTATION
	<p>University with commercial research to west;</p> <ul style="list-style-type: none"> • Want low rise, low density with space to think and avoid creating a blot on the landscape from afar. If companies outgrow the existing facilities of this area let them move to start creating employment in the region and free up space for new start ups; • Concerned there is too much concentration of academia in one place, whilst others say should be for university only and not employment; • To date development has been sensitive and attractive. However there seems to be a trend to produce bulky, high and unattractive buildings; • The height, bulk and density of the buildings should be tightly controlled (as in existing Masterplan) to avoid further buildings of excessive height and bulk; • The Master Plan must be re-visited, loss of quality rectified and particular attention paid to light pollution, adequate surface water drainage, traffic and parking, encouraging access by pedestrians, cycle, and public transport rather than car use; • Cycle routes on Madingley Road should be upgraded to Dutch standards and Coton Path improved. Plans for further development must include provision for high-quality cycle routes and adequate cycle parking; • Provision of more frequent & cheap bus services; • The surrounding Green Belt (either side of the site) should be protected; • The biodiversity contributes to the character of these areas – environmental features should be protected and it is highly important they are not developed in an unsympathetic way; • Development of West Cambridge will benefit from closeness to Coton Countryside Reserve, which will provide a valuable public recreational access for new residents and research workers. This should be covered in Section 106 and CIL funding; • The site is not a good model of sustainable development with a reluctance to provide better pollution, transport and noise reduction measures.

NEW OPTIONS ARISING FOLLOWING COMMUNITY INVOLVEMENT

There has been the suggestion that the site should be developed at a lower density with low rise buildings, but don't consider this is necessary or advantageous given the need to use land efficiently and the opportunities to create a more vibrant place with greater density and activity.

Evidence base:

- Cambridge City Council, Employment Land Review 2008
- Cambridge City Council, Employment Land Review 2012 update
- Cambridge City Council, Employment Land Review 2013 update
- SQW and others, Cambridge Cluster 50 Study 2011
- 'University of Cambridge: West Cambridge: Prepared for Cambridge City Council: April 2012'
- Cambridge City Council, North West Cambridge Area Action Plan Adopted 2009
- West Cambridge Master Plan Review 2004

Notable developments at West Cambridge include:

- Outline approval for the development of 66.45ha of land for University academic departments (73,000sq.m), research institutes (24,000sq.m), commercial research (41,000sq.m) and associated works (C/97/0961/OP)
- Reserved matters approvals for various phases of infrastructure development including access, roadways, cycle/pedestrian routes, car parking, drainage, and landscaping (06/0830/REM, 10/0315/REM, 12/1391/REM)
- Reserved matters approvals for a number of buildings including Sports centre (11/0979/REM), Broers Building (East Forum) (07/1061/REM), Physics of Medicine (06/0997/REM), Materials Science and Metallurgy (10/0538/REM), Chemical Engineering (12/1138/REM), and Data Centre (13/0034/REM)

How the policy came about:

152. The West Cambridge area south of Madingley Road was allocated for predominantly University of Cambridge related development in the Cambridge Local Plan 2006 (Policy 7/6). This was part of a strategy for sustainable growth close to the city. Policy 7/6 of the Cambridge Local Plan 2006 highlighted the importance of the site for supporting the University of Cambridge as one of the world's foremost universities. Its success has been demonstrated by a series of planning permissions for university and employment uses.
153. In looking ahead to 2031, the development of this area continues to be a key component of the spatial strategy for Cambridge with sustainable growth close to the city's edge. The current development has been built out at a relatively low density, and there are perceptions that this part of the city is less accessible, and lacks vibrancy and social interaction as an employment location, when compared to say the Station Area or other city centre locations.

Convenient, frequent links to the railway station, and therefore London, are also seen as a current disadvantage of this location.

154. In 2011 the Cambridge Cluster 50 Study also identified a number of critical changes for the competitiveness of the economy. This included designing new developments with social spaces, not just as locations for businesses and research. One of the biggest challenges for edge of town developments, such as West Cambridge, is that they need to function as effective social spaces and not isolated buildings. Most provision for social spaces has so far been within organisations rather than explicitly shared, the recently completed Hauser Forum being an exception. As big developments tend to leave this provision for later in the build until it can be funded through returns from the business space, and operators can be unwilling to take on such facilities until there is evidence of demand, it is important that further development incorporates and brings forward more community provision for those working, and indeed those living in the residences at the West Cambridge site. An intensification of development on the site could help to fund and provide the space for these uses.
155. The study also identified a need to improve connectivity between the railway station, city centre and the principal employment sites. The perception of isolation on the principal employment sites was one of the most consistent findings of the study. Whilst reality may be different, it is perception that often determines behaviour and therefore is a real challenge. With the provision of the Cambridgeshire Busway serving other employment areas, the West Cambridge site is seen as the most isolated. The study proposed a regular and direct shuttle-bus between West Cambridge and the other main high-tech locations, combined with greater efforts to support social interaction, which could do much to improve connectivity and change perceptions. It is also seen as essential that new developments are able to take pressure off the city centre as the location of choice and therefore increasing the appeal and accessibility of sites like West Cambridge as a destination is paramount.
156. With regards to the perception of the site having, so far, been developed at a low density, the Local Plan review provides the opportunity to explore the reviewing of the original masterplan and deliver higher densities and a greater variety of supporting facilities on the remainder of the site. The options around intensification of this site would look to support the Cambridge economy by ensuring a sufficient supply of employment land is available to meet the needs of business to 2031. It would also allow the site to respond to changing needs of businesses and their staff. This would be in addition to any existing planned employment sites (for example, North West Cambridge), in order for Cambridge to continue to achieve its economic potential.
157. This is considered a reasonable approach to explore, as there is a continuous need for employment space in Cambridge, in places accessible to the city

centre. The site is in a relatively sustainable location on the edge of the city and already served by public transport. Increasing the extent of use of the site, as well as support functions could also help deliver new or improved transport links to the site, including support for sustainable modes of transport.

158. Policy 18 is considered to be in conformity with the National Planning Policy in that it provides a positive strategy for the continued development of the West Cambridge site, securing economic growth to create jobs and prosperity. The continued allocation of the West Cambridge site to meet the needs of the University of Cambridge and the growth of the related high technology research cluster is important to the spatial strategy put forward in the draft Cambridge Local Plan 2014, being a strategic site for local and inward investment, and supporting the existing high technology research cluster.
159. As part of the Issues and Options (2012) consultation, the Council consulted on the option for a new specific policy for the West Cambridge area (Option 32). The University of Cambridge, in responding to this consultation were supportive of the Local Plan including a policy and proposals for the densification of West Cambridge. Subject to further analysis and testing, the ultimate capacity of West Cambridge beyond current planned levels of development (including the current masterplan and prior development) there could be up to 44,000m² additional commercial research floorspace, plus additional academic space on site. A paper 'University of Cambridge: West Cambridge: Prepared for Cambridge City Council: April 2012' contains more details on development totals in relation to the existing planning permission, strategic comparisons with local and global employment sites, and the potential for additional commercial research development, and is being sent to the Council in support of this representation.
160. Densification of development would help to create a more vibrant place at West Cambridge through the application of design principles relating to the establishment of clear zones of academic and commercial activity, the definition of smaller-scaled development sites and precincts, the creation of active pedestrian and wheelchair friendly street, provision of high-quality social activity nodes, a finer urban grain to development, the distribution of useable open space across the site, reinforcement of strategic viewing corridors and, generally, a more urban character.
161. The current outline planning permission and masterplan make provision for the development of 24,000m² space for research institutes. The large majority of that space has not come forward and there are no current proposals for further research institute development at West Cambridge. Local Plan policy should allow that space to come forward as commercial research or potentially as academic space. Policy for North West Cambridge allows 100,000m² employment and academic development at that site comprising approximately 60,000m² academic space and up to 40,000m² of research institute and

commercial research space. It was considered that a similar policy model for West Cambridge would be appropriate.

162. Support for the densification of the site also came from other stakeholders including the Master, Fellow and Scholars of St Johns College. The College also made representations related to their land to the south of West Cambridge, seeking the inclusion of a reference to this land being suitable for additional employment related development within Policy 18. However, given this land is currently in the Green Belt, and the importance that this area of the Green Belt plays to the setting of the city, it is not considered appropriate to include reference to this land in Policy 18.
163. More generally, representations received to the Issues and Options Report showed broad support for a policy on the West Cambridge site and the intensification of development.
164. The Interim Sustainability Appraisal Report of these options noted that this Option entails the more intensive development of the West Cambridge Site to provide high-density employment space. This is likely to lead to significant positive impacts in terms of the economy and will help meet the identified requirement for more office space for small high tech and research businesses. This Option also includes the proposal to create shared social spaces. This may have indirect benefits on communities and well-being. The Option states that key to developing West Cambridge will be the provision of good public transport infrastructure. This is key due to the relatively poor linkages between the site and public transport infrastructure. Without significant investment further development of the site would lead to greater pressure on transport infrastructure and congestion.
165. In conclusion, the responses and Sustainability Appraisal shows broad support to a continuation of the policy approach. The wording of the Cambridge Local Plan 2006 policy has been reviewed and updated in light of the significant amount of development that has already taken place on the site. In addition the changes to the policy have taken account of comments received, the benefits of increasing the density of future development on the site, and comparable existing policy guidance on University development contained in the North West Cambridge Area Action Plan.

Findings of the Sustainability Appraisal of the Cambridge Local Plan (July 2013)

166. The findings of the Sustainability Appraisal of the draft Cambridge Local Plan undertaken in July 2013, were that Policy 18 would lead to significant positive effects in terms of;
 - i. Provision of community facilities and amenities with potential benefits on the community and wellbeing;

- ii. Supporting both economic and social gains in the area;
- iii. Providing for the protection and enhancement of social and environmental assets; and
- iv. With Policies 34 and 35 help to minimise the adverse effects resulting from large scale development.

167. The Sustainability Appraisal indicated the policy could be improved by making explicit the need for the provision of publically accessible green space and protecting biodiversity by requiring suitable green infrastructure in any masterplan. This has been done through the incorporation of the following additional criterion (i) in Policy 18 which states:

‘proposals provide appropriate green infrastructure which is well integrated with the existing and new development and with the surrounding area.’

It is not appropriate to include reference to ‘publically accessible’ as West Cambridge is private, albeit other people are permitted to use it.

168. The supporting text also refers to the importance of biodiversity in Para 3.71, and this is reinforced by other policies which cover biodiversity in the draft Local Plan and which apply to West Cambridge including Policy 8: Setting of the City, Policy 31: Integrated water management and the water cycle, Policy 57: Designing New Buildings, Policy 59: Designing Landscape and the Public Realm. The new criteria (i) also covers biodiversity as it is part of the Local Plan definition of green infrastructure.

169. A further improvement could be made by ensuring that peripheral employment sites such as West Cambridge include social spaces. However, it was considered that this was adequately covered by criterion (h) of policy 13 (Areas of Major Change and Opportunity Areas – General Principles), which states that the areas of major change should create active and vibrant places which encourage social interaction and meeting, and foster a sense of community. This policy applies to all areas of major change.

Key Issues raised during Proposed Submission consultation

Policy 18: West Cambridge Area of Major Change	
Total Representations: 9	
Object: 5	Support: 4
Objections	<ul style="list-style-type: none"> • Need for commercial research uses to demonstrate a special need to be located close to the University of Cambridge is unduly restrictive. Criterion (b) should be amended; • The proposed height limit is unduly restrictive and should be removed from the policy; • The requirement for a needs statement to support planning applications is unnecessary and onerous. Instead applications should be supported by an Economic Statement setting out how

	<p>the proposed development will contribute to the economy of Cambridge, the region and the UK. This statement should not be required to demonstrate that development could not be accommodated elsewhere, but should demonstrate how the location and use is in accordance with existing planning policy;</p> <ul style="list-style-type: none"> • Need to provide more parking on site and not use surrounding residential streets; • More attention needs to be paid to green infrastructure, light pollution and building heights; • Intensification needs to be dealt with sensitively in order to protect the wider setting of the highly graded listed buildings within the historic core of the city, and at the same time form an appropriate edge to the city. English Heritage would not want to see this intensification delivered through tall buildings on the site; • Need more provision for disabled people;
Support	<ul style="list-style-type: none"> • Support with accompanying improvements to cycling infrastructure to deal with increased use; • Natural England welcomes criterion (i) on green infrastructure.

Minor Modifications suggested following Proposed Submission consultation and implications for Sustainability Appraisal

170. As a result of assessment, five minor modifications are suggested for Policy 18: West Cambridge Area of Major Change and supporting Figure 3.6: West Cambridge and NIAB Areas of Major Change and North West Cambridge. These changes are in the Addendum to the Cambridge Local Plan 2014: Proposed Submission document marked as PM/3/008 – PM/3/012.

171. PM/3/008 affects the first paragraph of Policy 18 and is suggested for clarity. This change reads:

“There is an expectation that the development ~~Development~~ of this area will come forward ~~be permitted~~ in line with the existing masterplan and planning permissions. The principal land uses will be:”

172. PM/3/009 relates to criterion (c) of Policy 18 and is suggested for clarity. The change reads:

“c. a revised masterplan is submitted and agreed ~~has been proposed~~ that takes an integrated and comprehensive approach to the provision and distribution of the uses, and supporting facilities and amenities;”

173. PM/3/010 relates to criterion (e) of Policy 18 and is suggested for clarity. The change reads:

“e. development should not exceed four commercial storeys (16 metres in total) and given the sensitivity of the landscape within the Green Belt to the south and west, a lower overall height may be appropriate along these edges;”

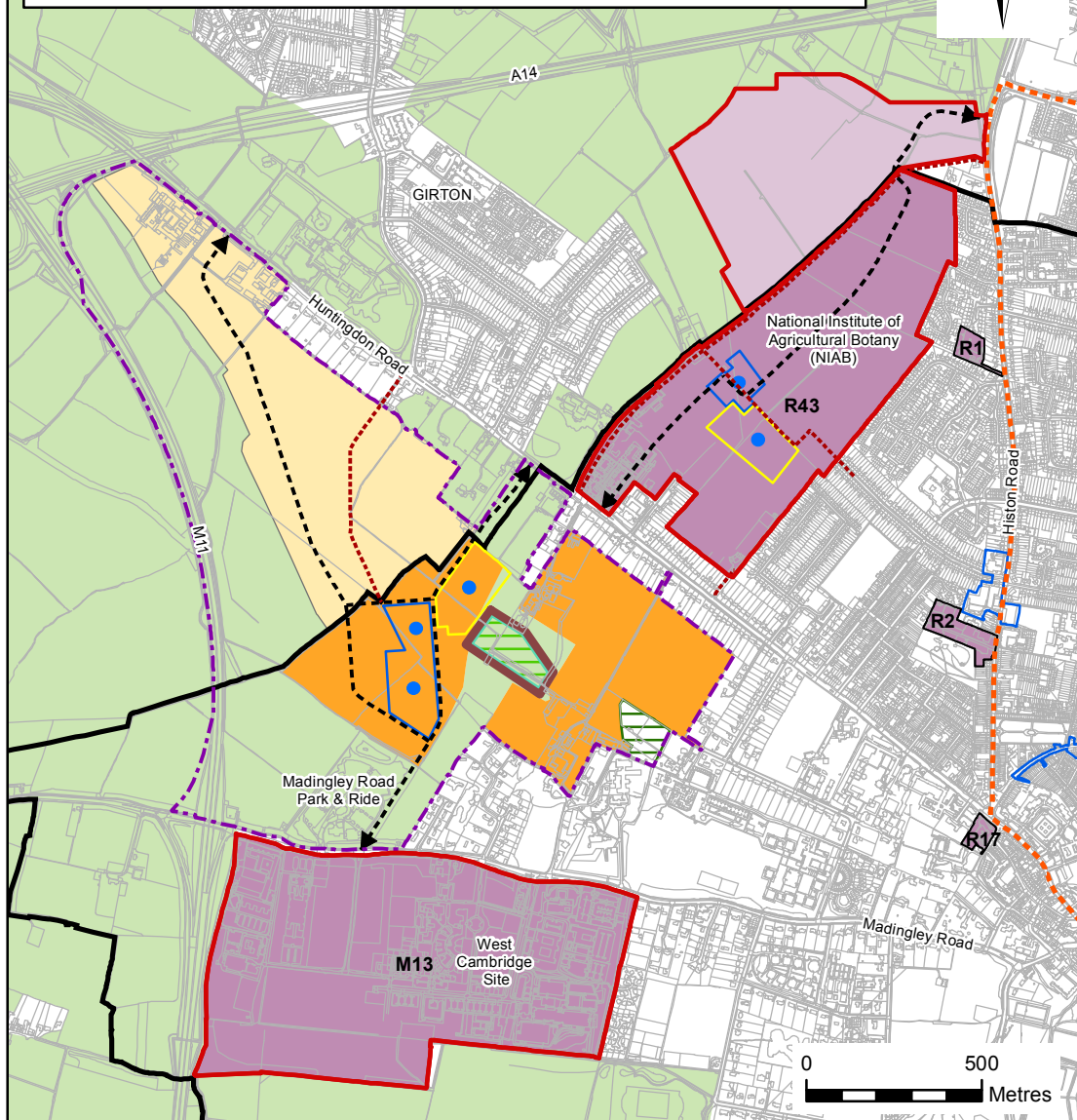
174. PM/3/011 relates to criterion (f) Policy 18 and is suggested for clarity. The change reads:


















“f. proposals respect the adjacent important Green Belt landscape setting to the south and west, and other neighbouring residential uses and views of the city from the west;”

175. PM/0/012 relates to Figure 3.6: West Cambridge and NIAB Areas of Major Change and North West Cambridge and involves a minor change to the key for the figure to correctly reference the North West Cambridge Area Action Plan. This figure as amended is shown on the following page.

176. Following consideration of the impact of these changes on the Sustainability Appraisal Framework, it has been concluded that these changes do not materially alter the findings of the Sustainability Appraisal.

Figure 3.6: West Cambridge and NIAB Areas of Major Change and North West Cambridge



- | | |
|---|---|
|  Proposal Site |  Cycle Route |
|  Proposal Site in SCDC |  Guided Busway (on road part) |
|  District, Local or Neighbourhood Centre |  Principal Road |
|  Local Facility (School, Shop, Community Use) |  Area of Major Change |
|  School |  Major Development - North West Area Action Plan |
|  Indicative Boundary of National Geological Interest (inc. 10m buffer) |  Major Development - North West Area Action Plan in SCDC |
|  Open Space |  North West Area Action Plan Boundary |
|  Site of Special Scientific Interest |  Cambridge City Boundary |
|  Cambridge Green Belt and Open Space | |

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Policy 19: NIAB 1

EXISTING POLICY TO BE REPLACED (CAMBRIDGE LOCAL PLAN 2006)	OPTION(S) BEING TAKEN FORWARD FROM THE ISSUES AND OPTIONS REPORT (2012) AND ISSUES AND OPTIONS 2 (2013)	OPTION(S) NOT BEING TAKEN FORWARD FROM THE ISSUES AND OPTIONS REPORT (2012)
9/8 Land between Huntingdon Road and Histon Road	Option 31 North west Cambridge	Not applicable

Key issues raised during Issues and Options (2012) and Issues and Options 2 (2013) consultations:

SECTION OF THE ISSUES AND OPTIONS REPORT (2012)	KEY ISSUES ARISING FROM CONSULTATION
Option 31: North West Cambridge	<ul style="list-style-type: none"> • Generally the reps are supportive of having a policy; • Some concerns about the impact this policy is having and will continue to have on this area of the city, particularly in transport terms e.g. gridlock on Huntingdon Road; • Must be consistent with the North West Area Action Plan; • The delivery of this development to the north west of the city should not involve the release of any further land from the Green Belt; • Concern the quality of the NIAB site (design, housing mix etc) will be inferior to University site and if not managed could have detrimental impact on surrounding neighbourhoods - proximity of high density, high rise housing to current low density, low rise housing. Seek lower densities across the whole area; • Although this area contains dwellings, it lacks community facilities - no pub, no shops, no church for miles. Occupants have good reason to feel isolated. Once the NIAB site is complete, how will its facilities serve the West Camb occupants? The 3 projects in N and NW Cambridge are being looked at too much in isolation of each other; • Need to combine transport implications of the 3 projects - West Cambridge, NW Cambridge, and NIAB. Support them all, but fear inadequate infrastructure.

SECTION OF THE ISSUES AND OPTIONS REPORT (2012)	KEY ISSUES ARISING FROM CONSULTATION
	<p>Concentration of development across the whole area will overload this part of Cambridge. Also need to look at transport to station and to schools on south side of the city;</p> <ul style="list-style-type: none"> • Ample cycle infrastructure should be designed into any development on the site. The junctions on Huntingdon Road, need improvement, to make them safe and easy to use by cyclists - recommend looking at Dutch-style junction designs. Cycle routes to and from the area from the city centre need improvement; • Concerned about flooding in the area and whether Huntingdon Rd and Histon Rd is a sensible place for residential development?
General issues	<ul style="list-style-type: none"> • The Local Plan for Cambridge must be properly integrated with plans for South Cambridgeshire. Need to look holistically at the housing and economic market area rather than at the administrative area; • Opportunities are being missed to provide more employment on sites such as Clay Farm and NIAB;
Option 19 / Figure 3.15: Broad Location 10: Land between Huntingdon Road and Histon Road	<p>ARGUMENTS IN SUPPORT OF THIS OPTION:</p> <ul style="list-style-type: none"> • This land coming forward for development is supported; • It would be less damaging, given the development that has already taken place, than on most of the other sites being considered; • Difficult to argue the case for leaving an increasingly isolated area of farmland bounded by some of the busiest roads in the county undeveloped given the precedent of Orchard Park and NIAB2. • With the A14 so close, this areas has a much more urban feel than other Green Belt sites around the city; • The best of the proposed fringe sites with the guided bus. <p>OBJECTIONS TO THIS OPTION:</p> <ul style="list-style-type: none"> • Not possible to assess capacity of this location without knowing how many dwellings could be accommodated in South Cambridgeshire; • Girton would also be at risk of being subsumed as a suburb of the conurbation; • Highly sensitive location whose contribution to the Cambridge Green Belt is well documented;

SECTION OF THE ISSUES AND OPTIONS REPORT (2012)	KEY ISSUES ARISING FROM CONSULTATION
	<ul style="list-style-type: none"> • The NIAB development is going ahead so it is unnecessary to use up a piece of land of high importance to the Green Belt; • Very close to the A14 so it is not going to be a pleasant place to live.
Option 140: New foodstore in North West Cambridge	<ul style="list-style-type: none"> • generally supported but some objection – do not believe that a policy is needed in this respect; • Support as this would formalise the Informal Planning Policy Guidance; • The foodstore if approved should have a filling station; • Scope for a bus connecting to out of centre stores; • 2,000 square metre maximum requirement is too low and contrary to the findings of the Council’s evidence base and the requirements for the NIAB site; • A policy on this could also apply to the University site.
NEW OPTIONS ARISING FOLLOWING COMMUNITY INVOLVEMENT	
Representations have questioned development on this site, but part of the site is already being developed at the western end, the rest is approved subject to the completion of a section 106 agreement.	

Evidence base:

- Cambridge City Council and South Cambridgeshire District Council, Informal Planning Policy Guidance on Foodstore Provision in North West Cambridge (2011)
- Mixed use development including up to 1593 dwellings, primary school, community facilities and open space (Reference City Council, 07/0003/OUT and South Cambridgeshire, S/0001/07/F)

How the policy came about:

177. The Land between Huntingdon Road and Histon Road, now known as NIAB1, was allocated for residential development in the Cambridge Local Plan 2006 (see Policy 9/8). This was part of a strategy for delivering sustainable growth close to the city. In looking ahead to 2031, the development of this area continues to be a key component of the spatial strategy for Cambridge with sustainable growth close to the city’s edge.
178. The national objectives set out in the National Planning Policy Framework promote economic development as the key driver for the United Kingdom,

therefore having a clear supply of housing land available for development will be crucial to the city. The key issues for the growth of the city in the next Local Plan are in facilitating the continued economic growth of Cambridge and meeting the demands for market, affordable, key worker and student housing. The Local Plan Review and related work on the Strategic Housing Market Assessment has identified the need for 14,000 homes. The large existing allocations on the fringe of the city are expected to deliver over 6,000 homes of which the NIAB development is planned to provide over 1,500 homes within the city. This includes the NIAB Frontage site, which has permission for 187 housing units and is currently being implemented.

179. The outline resolution to approve permission for the area within the city, subject to S106 Agreement, was granted in July 2010. South Cambridgeshire District Council gave a full resolution for the development for the balance of the site within their area. Work is progressing on the Design Code for the site and delivery of key infrastructure.
180. The housing market in Cambridge remains strong, with continued demand and high prices and high densities consistently achieved. There is therefore a strong case that the housing completions rate will continue and even accelerate over the first part of the plan period and the NIAB 1 site is well placed to deliver this growth. The latest indications are that the initial groundworks will begin late 2013 with the first houses delivered the following year.
181. Policy 19 is considered to be consistent with the requirements of the National Planning Policy Framework in that it provides guidance on large-scale housing development in this area, which will contribute to meeting the objectively assessed housing need of the area, helping to secure economic growth and creating jobs and prosperity. The policy promotes a mix of uses for day-to-day activities, including the provision of schools and other local services and facilities.
182. As part of the Issues and Options (2012) consultation, the council consulted on the proposal for a specific policy for the North West Cambridge area, to cover both the University development at land between Madingley Road and Huntingdon Road, and the NOAB 1 site. In their response to this consultation, the University of Cambridge noted that any policy in relation to the University's development site must be entirely consistent with the North West Cambridge Area Action Plan, which will not be replaced by the Local Plan. More generally, there was broad support for the development of a policy covering this area of Cambridge.
183. Policy 19 now focuses on the NIAB1 site, as opposed to also considering the University of Cambridge's development on land between Madingley Road and Huntingdon Road, which is covered by policies contained within the North West Cambridge Area Action Plan. The NIAB 2 site abuts the site to the north.

There has been close working with South Cambridgeshire District Council on the comprehensive and integrated planning of the two sites, which across the boundary, and also in terms of coordinating service provision with the nearby North West Cambridge site. South Cambridgeshire has also commented on the draft policy.

184. The Interim Sustainability Appraisal Report noted that the continued support for development to support staff and key workers from the University of Cambridge in North West Cambridge is positive, as is the development of a new residential community between Huntingdon Road and Histon Road. The North West Cambridge site will help to support the leading position of the University of Cambridge and will also help to address levels of deprivation, which are quite extensive in northern Cambridge. It therefore has positive impacts on communities and well being on the economy and on North Cambridge.
185. In January 2013, as part of the Issues and Options 2 consultation, Cambridge City Council and South Cambridgeshire District Council jointly consulted on the NIAB 3 site to the north of the city within South Cambridgeshire (referred to as the GB6 site). South Cambridgeshire District Council has indicated its intention to include NIAB 3 in its draft local plan as a residential allocation only. This has taken into account the existing NIAB 1 allocation in the city, which we are proposing here to continue, and will need to be co-ordinated together.
186. The responses and Sustainability Appraisal therefore show broad support to a continuation of the policy approach. In conclusion, much that was in Policy 9/8 of the Cambridge Local Plan 2006 is still relevant because only a small part of the site has been developed and remains separate from the North West Cambridge area. The NIAB 1 site is still very much needed to support the economic and housing growth of the city and the resolutions to grant permission and ongoing discussions are a strong sign that the larger site will come forward within the plan period. The policy has therefore been updated to reflect the latest guidance and best practice.

Findings of the Sustainability Appraisal of the Cambridge Local Plan (July 2013)

187. The findings of the Sustainability Appraisal of the draft Cambridge Local Plan undertaken in July 2013, were that Policy 19 would lead to significant positive effects in terms of;
 - i. The landscaping and buffer areas leading to biodiversity benefits;
 - ii. Provision of community facilities, education facilities, local shopping & services, and open space & recreation with potential benefits on the community and wellbeing;
 - iii. Increasing open Space provision in North Cambridge (particularly in Arbury) in conjunction with Policy 21 on Mitchams Corner;

- iv. Balancing well residential growth with protection; and
- v. With Policies 34 and 35 help to minimise the adverse effects resulting from large scale development.

188. The Sustainability Appraisal recommends a further strengthening of the policy by requiring a comprehensive transport strategy and taking into account noise pollution and footpath related constraints.

This has responded to by the incorporation of the following two additional criterion in Policy 19;

‘it includes a comprehensive transport strategy for the site, incorporating a sustainable transport plan to minimise reliance on the private car’

‘where possible retain and enhance existing definitive footpaths that cross the site or provide suitable and safe equivalent links of a similar length as part of the new development’

In addition, the last sentence in Policy 18; *‘This should include assessing the level, form and type of car parking that exists on the site.’* has been removed because there is no existing car parking.

189. The key constraints of noise pollution and footpaths crossing the site are referred to in Paragraph 3.76 of Policy 19. Noise Pollution is also covered in Policy 35: Protection of Human Health from Noise and Vibration which specifically refers to major sites and noise sensitive development, and refers to the need for noise assessments and noise mitigation measures. It was therefore concluded that no further changes needed to be made to the Draft Plan about noise pollution.

Key Issues raised during Proposed Submission consultation

Policy 19: NIAB 1 Area of Major Change	
Total Representations: 12	
Object: 9	Support: 3
Objections	<ul style="list-style-type: none"> • Needs to be accompanied by improved transport infrastructure and connections (e.g. clearly linked to the guided bus and the Science Park; • Needs stronger wording in relation to loss of the sports ground and retention and enhancement of footpaths; • Policy and supporting text needs to be redrafted to take account of the progress made with the outline planning permission and completion of associated S106; • Seek an amendment to criterion (d) to provide more definition in relation to food store provision.

Support	<ul style="list-style-type: none"> Will help to enhance life on surrounding estates through improved facilities and public transport routes.
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Minor Modifications suggested following Proposed Submission consultation and implications for Sustainability Appraisal

190. As a result of assessment, three minor modifications are suggested to the supporting text for Policy 19: NIAB 1 Area of Major Change. These changes are in the Addendum to the Cambridge Local Plan 2014: Proposed Submission document marked as PM/3/013 – PM/3/015.

191. PM/3/013 affects paragraph 3.76 and is suggested in response to a representation (Representation Number 26572) and in order to ensure clarity on the location of the local heritage asset adjacent to the site. This change reads:

“3.76 Key constraints on the site include noise pollution from the A14. In addition, definitive footpaths cross the site linking Histon Road and Huntingdon Road with Girton. The existing National Institute of Agricultural Botany (NIAB) building on Huntingdon Road, which is a local heritage asset adjoining the site, will need to be respected ~~retained and integrated within the scheme.~~”

192. PM/3/014 relates to paragraph 3.78 and is suggested to correct a drafting error. This change reads:

“Figure 3.6 provides a diagrammatic representation of the principal land uses, access and transport arrangements and landscape provision for the NIAB site and its relationship with North West Cambridge, West Cambridge, and the rest of the city.”

193. PM/3/015 affects paragraph 3.79 and is suggested in response to a representation (Representation Number 26572) and in order to ensure clarity. This change reads:

“3.79 Any further planning applications within this area will need to be in accordance with the outline consents and/or this policy. The design will also need to take account of existing character, retain environmental features of value, enhance biodiversity and create a well-integrated ~~edge with NIAB 2-~~ development with its context.”

194. Following consideration of the impact of these changes on the Sustainability Appraisal Framework, it has been concluded that these changes do not materially alter the findings of the Sustainability Appraisal.

Policy 20: Station Areas West and Clifton Road Area of Major Change

EXISTING POLICY TO BE REPLACED (CAMBRIDGE LOCAL PLAN 2006)	OPTION(S) BEING TAKEN FORWARD FROM THE ISSUES AND OPTIONS REPORT (2012) AND ISSUES AND OPTIONS 2 (2013)	OPTION(S) NOT BEING TAKEN FORWARD FROM THE ISSUES AND OPTIONS REPORT (2012)
<ul style="list-style-type: none"> Policy 9/9 Station Area 	<ul style="list-style-type: none"> Option 28 Station Area; 	<ul style="list-style-type: none"> Not applicable

Key issues raised during Issues and Options (2012) and Issues and Options 2 (2013) consultations:

SECTION OF THE ISSUES AND OPTIONS REPORT (2012)	KEY ISSUES ARISING FROM CONSULTATION
Option 28: Station Area	<ul style="list-style-type: none"> Generally, the principle for development in this area is supported; Care needs to be taken to ensure area does not become over developed; Car parking highlighted as an issue for the area; Pick up and drop off point required in the area; Questions asked as to whether more office space is needed in this area; More residential development needed; More cycle parking is needed.
NEW OPTIONS ARISING FOLLOWING COMMUNITY INVOLVEMENT	
Not applicable	

Evidence base:

- Cambridge City Council (2004). The Station Area Development Framework

How the policy came about:

195. In 2004, before the Station Area (now Station Area West in this policy) was identified as and Area of Major Change, the council adopted the Station Area Development Framework. It had the status of Supplementary Planning Guidance (SPG) until the adoption of the Cambridge Local Plan 2006. The vision contained in the SPG was, broadly speaking, to “transform and under-used and unattractive area of the city” through several measures, including an improved transport interchange, a new mixed-use neighbourhood, a range of complimentary uses and by setting high standards of urban design and sustainable development.

196. Following adoption of the Cambridge Local Plan 2006, planning activity for the Station Area (again to note this is now Station Area West) has proceeded apace. A number of buildings have been built and are now occupied, including student accommodation for Anglia Ruskin University, a new building for Microsoft Research, and the creation of a new bus interchange and link to the southern leg of the Cambridgeshire Guided Bus route.

197. In June 2012, the consultation responses from the Issues and Options Report noted general support for the principle of the continued development of the area. Comments noted the following:

- that care needs to be taken to ensure area does not become over developed;
- car parking highlighted as an issue for the area;
- questions were asked as to whether more office space is needed in this area;
- more residential development as well as cycle parking is needed.

198. The Interim Sustainability Appraisal Report of these options stated:

“This Option supports the continued regeneration of the Station Area as a mixed use area, which has a range of associated positive impacts in terms of sustainability, especially for the economy and communities and well being. Specifically it supports further development of office space, which was identified as a key issue in the SA Scoping Report. While the Station Area is technically in the City Centre, this Option will have broader positive implications on the neighbouring areas in South and East Cambridge. It is also likely that the regeneration of the area will continue to improve the townscape, although new development should be sensitive to the historic environment especially given its proximity to the city centre.”

199. Much progress has been made in regenerating Station Area West since the production of the SPG in 2004, however many more sites are in the planning stages or significant planned public realm and transport improvements are still to take place. A policy is required in order to further underpin the regeneration of this area and ensure it ultimately achieves the original vision of a “transformed” part of the city as an improved transport interchange and new mixed-use area. Since the publication of the Issues and Options Report in 2012, the Council has looked further at what redevelopment opportunities and development potential exists on the east side of the rail line in and around the Clifton Road area. This area presents significant opportunity to expand the benefits to the Station Area regeneration east of the rail line through the designation of the current Clifton Road Industrial Estate as a Proposal Site. This area is now referred to as “Clifton Road Area of Major Change”.

200. The Clifton Road area is currently a small industrial estate that provides space for a mix of storage facilities, employment and industrial-related sales and supplies. However, as the supporting text to the policy notes, in the life of this plan there is the potential for new employment and residential uses in this area. The area is highly accessible to Station Area West and so enjoys excellent transport links, and equally is largely surrounded already on its north, east and southerly boundaries by existing residential uses or residential uses currently under construction. As the policy text notes, key to the successful development of this area will be access to Cherry Hinton Road on its southerly end; a detailed transport assessment will be necessary to determine the more precise capacity of development of the Clifton Road Area of Major Change and requisite measures at the road junction with Clifton Road for all modes of traffic.

Findings of the Sustainability Appraisal of the Cambridge Local Plan (July 2013)

201. Policy 20 (Station Area West and Clifton Road Areas of Major Change) seek to regenerate the area around the train station into a vibrant, mixed-use development centred around an accessible, high quality and improved transport interchange. This policy should help to promote the use of more sustainable forms of transport at this location therefore having significant positive contributions to the transport objectives.
202. Policies focused on 'green infrastructure' should lead to biodiversity benefits. These include Policy 16 (landscaping & buffer areas); Policy 17 and Policy 19 (open space and recreation including allotments); Policy 20 (open green spaces in the Station West area); and Policy 25 (the creation and enhancement of areas of public open space). These policies could potentially be improved by making explicit the need to consider such spaces as a part of a wider green infrastructure network across the City. No change was made to policy 20 following this recommendation as if carried through in every possible place within the plan it would be repetitious and would duplicate policy 68 of the plan.
203. A large number of policies set out to provide guidance to developers in areas of major change which may have positive effects on community and wellbeing. These include Policies 17 and 19 (the provision of community facilities, education facilities, local shopping & services, and open space & recreation); Policy 11 (expansion or redevelopment of retail or leisure uses); Policy 15 (establishment of recreation and commercial uses); Policy 18 (provision of community facilities & amenities); Policy 20 (principal land uses to include open spaces and community uses); Policy 21 (shops and services); and Policy 23 (development of arts and cultural facilities). Policy 26 details a list of site specific development opportunities considered suitable for residential, residential moorings, employment, university use or mixed use which should

lead to positive effects on community and wellbeing through providing housing, leisure, retail and employment opportunities.

204. A key policy in the East Cambridge Functional Area is Policy 20. The policy aspires to deliver a major regenerated multi-modal transport interchange which serves Cambridge and the wider sub-region, focused on the existing rail station. In addition to this there would be improved cycling and walking routes and facilities including the potential for future improvements for pedestrians and cyclists between Station Areas West and the Clifton Road Area, the main location for employment land delivery in the Functional Area. By focusing development at a sustainable location and increasing the capacity of public transport and linkages between modes this should lead to significant positive benefits in terms of encouraging use of sustainable transport.
205. Policy 20 specifies a need for open spaces, both hard surfaced and green. The more general city-wide policies and provision of a new, high quality and accessible urban park should increase the quality of provision and lead to significant positive effects in terms of open space provision.

Key Issues raised during Proposed Submission consultation

Policy 20: Station Area West and Clifton Road Areas of Major Change	
Total Representations: 31	
Object: 26	Support: 5
Objections	<ul style="list-style-type: none"> • Emphasis should be on quality architecture to reflect the older architecture of the city – no high rise beyond local heights; • Concern about the impact of ‘leisure uses’ on residential amenity – should be no evening venues or those that serve alcohol; • All vehicle access should be via the existing Cherry Hinton Road (not Rustat Road); • Residential properties only facing Rustat Road; • Concerns about the quality of development already being delivered at the Station Area. Not befitting the area’s status as an important ‘gateway’ to the historic city centre; • A high quality public transport interchange has yet to be delivered. Needs to be better pedestrian and cycle access; • Need to include requirements for transport other than cycling; • Use classes are too restrictive and should include A1, A2, A3, B1c, B8, D1 (all) and D8 (all) to prevent restrictions that could limit the opportunity for creation of a vibrant mixed use quarter and to provide use classes that are appropriate to the location adjacent to the railway; • The Chisholm Trail should be identified on Figure 3.7; • 500 homes on this site is too much and not in keeping with the surrounding area; • Concerned about the loss of current office space at Clifton Road

	<p>as well as no reference to provision of new office space – there is a need for more office space in central Cambridge;</p> <ul style="list-style-type: none"> • Should make reference to the opportunity that this site presents to create a second entrance to the railway station from the east; • Need for more family homes, not just blocks of flats; • There should be a ceiling on the amount of office development permissible; • Station Area West (1) – the residential capacity of 331 units should be tested thoroughly and should be considered a minimum for this sustainable location; • The SPD should also ensure that any planning application would only be for a type and mix of dwellings for which appropriate education provision could be secured (Cambridgeshire County Council); • The Flying Pig Public House makes a positive contribution to the character and appearance of the conservation area. It should be retained and sensitively incorporated into any redevelopment of the Station Area West (2) site. Impact of the development on the Botanic Gardens (Grade II* Registered Park and Garden) will require due regard and will have implications for the height of development (English Heritage); • Object to the allocation of this site, as there is no evidence to demonstrate how the site will be redeveloped. Given the lack of available employment sites in Cambridge, it is unclear where the existing employment uses will be relocated. This allocation should be deleted from the plan; • Support subject to the provision that the Mail Centre is relocated/re-provided elsewhere, and that this relocation is viable and commercially attractive to Royal Mail; • Need to make specific reference to the phasing of the Clifton Road Area development, and provide timescales for the production of the SPD; • Residential capacity on Clifton Road should be indicative, not maximum; • References to traffic movements and access to the station needs to be amended to ensure it allows sufficient flexibility to reflect detailed traffic work that is yet to be undertaken.
Support	<ul style="list-style-type: none"> • Could usefully include the relocation of the bus station to the area adjacent to the railway station to reduce the number of vehicles going through the city centre; • Support for mixed use development – consider building nurseries, schools, GP surgeries; • Should be a strong emphasis on small working units with housing and retail to produce a vibrant mixed-use local community; • Welcome the acknowledgement of hard surfaces contributing to

	<p>useable open space;</p> <ul style="list-style-type: none"> • Support from Cambridge City Council’s Property Services Department, which owns the freehold of Clifton Road Industrial Estate; • Support for the creation of a Supplementary Planning Document for the Clifton Road Area; • Support for the potential for a new footbridge between Station Areas West and the Clifton Road Area of Major Change.
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Minor Modifications suggested following Proposed Submission consultation and implications for Sustainability Appraisal

206. As a result of assessment, a minor modification is suggested for Policy 20, criterion (q). This change is in the Addendum to the Cambridge Local Plan 2014: Proposed Submission document marked as PM/3/016. This change is suggested in response to a representation (Representation Number 27049). This change reads:

“q. allow the potential for future improvements to the access for pedestrians and cyclists between Station Areas West and Clifton Road Area, including investigation of a possible foot and cycle eastern entrance to the railway station; and

207. Following consideration of the impact of this change on the Sustainability Appraisal Framework, it has been concluded that this change does not materially alter the findings of the Sustainability Appraisal.

Policy 21: Mitcham’s Corner Opportunity Area

EXISTING POLICY TO BE REPLACED (CAMBRIDGE LOCAL PLAN 2006)	OPTION(S) BEING TAKEN FORWARD FROM THE ISSUES AND OPTIONS REPORT (2012) AND ISSUES AND OPTIONS 2 (2013)	OPTION(S) NOT BEING TAKEN FORWARD FROM THE ISSUES AND OPTIONS REPORT (2012)
Not applicable	Not applicable	Not applicable

Key issues raised during Issues and Options (2012) and Issues and Options 2 (2013) consultations:

Not applicable

Evidence base:

- Cambridge City Council (2003). Mitcham’s Corner Area Strategic Planning and Development Brief.

How the policy came about:

208. In 2003, the council published guidance for the area entitled the “Mitcham’s Corner Area Strategic Planning and Development Brief”. This brief set out the strategic planning and development guidelines for the consideration of future development proposals in the Mitcham’s Corner Area. Interestingly, at the time, in respect of the area it noted: “...its sense of identity and cohesion has been eroded in recent times due to the dominance of the local highway network and through some poor quality development”. It could be concluded therefore that the problems identified in this 2003 document still stand. Policy 21 seeks to address these problems through identifying the need for improvements to the public realm and street network in the immediate area.
209. The council did not consult on an option for this area as part of the Issues and Options Report consultation in 2012 and so there was no Interim Sustainability Appraisal Report. However, as part of representations to the Issues and Options Report a number of respondents suggested the need for the Mitcham’s Corner Area to be designated as an Opportunity Area. After further discussions with Cambridgeshire County Council and in light of growing interest for development in the area, it is considered that the area would appropriately be designated as an Opportunity Area in order to realise a long-held desire both by the public and the council to improve the quality of the environment of the area. Collaboration and agreement with the County Council to help deliver improvements to the highway environment in Mitcham’s Corner will be essential to the delivery of this policy.
210. The designation of Mitcham’s Corner as an Opportunity Area helps deliver key objectives as contained in the National Planning Policy Framework, including objectives found in Paragraph 21 which states that “Local Planning Authorities should....identify priority areas for economic regeneration, infrastructure provision and environmental enhancement”. In relation to sustainable modes of transport which this policy is partly promoting, the National Planning Policy Framework states at Paragraph 29 that “in preparing local plans, local planning authorities should....support a pattern of development which, where reasonable to do so, facilitates the use of sustainable modes of transport”.

Findings of the Sustainability Appraisal of the Cambridge Local Plan (July 2013)

211. A large number of policies set out to provide guidance to developers in areas of major change which may have positive effects on community and wellbeing. These include Policies 17 and 19 (the provision of community facilities, education facilities, local shopping & services, and open space & recreation); Policy 11 (expansion or redevelopment of retail or leisure uses); Policy 15 (establishment of recreation and commercial uses); Policy 18 (provision of community facilities & amenities); Policy 20 (principal land uses to include

open spaces and community uses); Policy 21 (shops and services); and Policy 23 (development of arts and cultural facilities). Policy 26 details a list of site specific development opportunities considered suitable for residential, residential moorings, employment, university use or mixed use which should lead to positive effects on community and wellbeing through providing housing, leisure, retail and employment opportunities.

212. An Opportunity Area is designated at Mitcham's Corner (Policy 21) where redevelopment proposals which deliver a mix of uses including local shops and services with residential at upper floors will be supported. Development here could lead to positive effects in terms of encouraging regeneration and attracting investment, which in turn could lead to additional employment opportunities for the residents of the area. The main aim of the Opportunity Area is to improve the quality and character of the area and create a 'sense of place' which should make the area more vibrant, restoring the balance between people and vehicles. The 1970s gyratory system has created an unpleasant environment for pedestrians and cyclists which is difficult to navigate and has eroded the character of the area. Public realm improvements aim to create a low speed environment giving pedestrians and cyclists greater priority, de-cluttering the street scene and creating opportunities for new public spaces. As such the Opportunity Area should lead to significant positive effects in terms of encouraging high quality design and public realm in this area of the city.
213. Policies 14 and 21 both require improvements to walking and cycling infrastructure in an attempt to achieve modal shift towards sustainable transport modes. Policy 21 should rebalance the road network in favour of walking and cycling by removing / remodelling the gyratory; whilst Policy 14 seeks to link the proposed new station at Cambridge Science Park to the Science Park itself and the Busway. This should improve accessibility both in and out of the area and ensure that new employment opportunities are within easy reach. These provisions should result in significant positive effects in terms of encouraging public transport, walking and cycling whilst also increasing access to employment opportunities from more deprived parts of the city.
214. Specific to the North Cambridge Functional Area, development that comes forward should increase provision by following the above policies in the plan. At Mitcham's Corner (Policy 21) a criterion states that development proposals should create opportunities for new public spaces. Mitcham's Corner is at the southern extent of Arbury ward which should increase open space provision for residents. Notably, just west of Arbury ward is the NIAB 1 Area of Major Change (Policy 19) which requires provision of open space as part of the development; which should benefit residents to the north of the ward. Taken as a whole, policies in the plan should increase open space provision in North Cambridge – particularly in Arbury – and should lead to significant positive effects.

Key Issues raised during Proposed Submission consultation

Policy 21: Mitcham's Corner Opportunity Area	
Total Representations: 23	
Object: 13	Support: 10
Objections	<ul style="list-style-type: none"> • The Friends of Mitcham's Corner are very pleased with the designation of Mitcham's Corner as an opportunity area, especially the commitment to reconfigure the gyratory road system. They also state the following however: <ul style="list-style-type: none"> ○ Major development in this area should be closely coordinated and the Friends of Mitcham's Corner stress the necessity for a masterplan. No major development should be approved before a masterplan has been approved; ○ Firm action is needed to decide a timescale, funding, consultation strategy, commissioning of a design practice, scope of the masterplan and a framework for liaising with the Highways Authority. ○ The Friends of Mitcham's Corner would like to be involved in all stages of the process. ○ All the sites in the list below should be addressed by masterplanning work on the opportunity area: <ul style="list-style-type: none"> ▪ Henry Giles House; ▪ Barclays Bank and land down to the river; ▪ Staples site with Lloyds TSB Bank; ▪ No. 1 Milton Road with possibly The Portland Arms pub; ▪ Old Milton Road School site (corner of Milton Road and Gilbert Road); ▪ Ailsa Court (Co-op and residential); ▪ Cambridge City Football Club; ▪ Nos 34 – 36 Chesterton Road; ▪ Nos 21 – 23 Milton Road at the entrance to the Westbrook Centre. • Wording must be tightened up to ensure the removal of the gyratory; • It should be a community area with shops and services primarily for local use and not a commercial or student sector. New buildings should be in keeping with the scale and mass of existing ones; • The policy refers to scale of massing and new development responding to the prevailing character of the area. Pan Albion are concerned that the policy should not be so prescriptive, as there is nothing to say that an appropriately designed building cannot be satisfactorily achieved, and act as a landmark in this part of Cambridge; • Pan Albion and TLC do not consider it appropriate that a masterplan must be approved before an application. The policy

	<p>needs to be amended so that there is no indication that proposals on prospective application sites be delayed for a masterplan to be prepared;</p> <ul style="list-style-type: none"> • Pan Albion considers that the proposal to remove or revise the gyratory should be deleted. There is no need to specify how 'place making over vehicles' can be achieved - it could be achieved without the need to revise the gyratory; • MGD have stated that 1 Milton Road should be identified within the supporting text as being a potential regeneration site for mixed use development within the wider opportunity area. This addition should be added to the supporting text; • Area would benefit from well-planned parking facilities to support local businesses; • Any development of the Staples and Lloyds Bank island must not preclude the possibility of reinstating the original pattern of streets and removing the one way 'race-track' which blights the area at present; • This policy will prevent free traffic flow and will add to congestion; • Major gaps need to be addressed: <ul style="list-style-type: none"> ○ How people will travel to Mitcham's Corner; ○ There is currently no coordinated provision of public transport to and from Mitcham's Corner; ○ Provision of parking for both shoppers and businesses so that an improved Mitcham's Corner does not impact residents' parking; ○ The balance of residential accommodation types so that Mitcham's Corner is a place to live as well as visit. • Need to reference historic environment, including conservation area status; • The policy includes appropriate guidance on massing, use and public realm improvements. Criterion (e) should not include the word 'simple', as this unnecessarily precludes high quality or unusual materials forming part of the work (e.g. through public art); • Provide a new criterion (f) provide a nodal interchange for bus services centrally located at Mitcham's Corner to be most convenient for access to local services; • This opportunity area should incorporate site R3 (Cambridge City Football Club ground off Milton Road); • The map (Figure 3.8) should be amended so that the southern boundary follows the riverbank between Victoria Avenue and Henry Giles House.
Support	<ul style="list-style-type: none"> • General support for the area's designation as an opportunity area; • General support for the works to the gyratory, but concern that it will not be implemented for some time; • Support for objective of the opportunity area, but concerns about

	<p>the development of site R4 (Henry Giles House);</p> <ul style="list-style-type: none"> • TLC supports the proposal in Figure 3.8 which indicates that there is "potential for focal building" at the corner of Milton Road and Gilbert Road and considers that this is currently reflected in the emerging proposals for the site.
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Minor Modifications suggested following Proposed Submission consultation and implications for Sustainability Appraisal

215. As a result of assessment, a minor modification is suggested for Policy 21, criterion (e). This change is in the Addendum to the Cambridge Local Plan 2014: Proposed Submission document marked as PM/3/017. This change is suggested in response to representations (Representation Numbers 26982 and 26930) and to be consistent with changes to Policy 22. This change reads:

“e. use ~~a simple~~ an appropriate and durable palette of materials.”

216. Following consideration of the impact of this change on the Sustainability Appraisal Framework, it has been concluded that this change does not materially alter the findings of the Sustainability Appraisal.

Policy 22: Eastern Gate Opportunity Area

EXISTING POLICY TO BE REPLACED (CAMBRIDGE LOCAL PLAN 2006)	OPTION(S) BEING TAKEN FORWARD FROM THE ISSUES AND OPTIONS REPORT (2012) AND ISSUES AND OPTIONS 2 (2013)	OPTION(S) NOT BEING TAKEN FORWARD FROM THE ISSUES AND OPTIONS REPORT (2012)
Not applicable	Option 38 Eastern Gate	Not applicable

Key issues raised during Issues and Options (2012) and Issues and Options 2 (2013) consultations:

SECTION OF THE ISSUES AND OPTIONS REPORT (2012)	KEY ISSUES ARISING FROM CONSULTATION
Option 38: Eastern Gate	<ul style="list-style-type: none"> • Generally good support for the option although some uncertainty as to whether the plans will work (particularly in terms of traffic); • Currently the area is designed for cars, so attracts cars – consider making some parts public transport only?; • Call to extend area as far as Park and Ride site at Newmarket Road.

NEW OPTIONS ARISING FOLLOWING COMMUNITY INVOLVEMENT
Not applicable

Evidence base:

- Cambridge City Council (2011). Eastern Gate Development Framework
- Arup (2013). Cambridge City Centre Capacity Study

How the policy came about:

217. The “Eastern Gate” area of Cambridge is comprised of over-engineered, highway-dominated roads and spaces that have separated neighbourhoods and led to an area of poor quality townscape. This policy seeks to redress that balance over time by making a series of key improvements and further some of the redevelopment of the area that has already started along Newmarket Road recently, such as a new Travel Lodge at the corner of Coldham’s Lane and the re-development of the former Cambridge Regional College site into new housing.
218. As part of the June 2012 consultation on the Issues and Options Report, one option was consulted on for this area, specifically Option 38 (Eastern Gate). This option recommended the five key projects now forming part of Policy 22, specifically changes to the public highway and streetscape. Representations received noted generally good support for the option although there was some uncertainty as to whether the plans will work (particularly in terms of traffic improvements). Representations also noted that the area is designed for cars, so attracts cars, and suggested making some parts for public transport only.
219. The Interim Sustainability Appraisal Report for this option noted the following:
- “The large and busy roads and junctions in this area, combined with areas of bulky industrial buildings have resulted in geographically fragmented communities. The Option’s focus on improving the highways and public realm will have immediate and direct positive effects on encouraging greater walking and cycling in the area which is a key issue across a number of sustainability topics. More generally, this Option will contribute to an improved townscape and increase the attractiveness of the city as a place to live, work and spend leisure time. Furthermore, it could act as a catalyst to the regeneration of the wider area and help address identified deprivation issues in East Cambridge.”
220. When the council prepared and consulted on the Eastern Gate Development Framework Supplementary Planning Document, there was general agreement that improvement was needed to the quality of the local environment of this area. The council considers that a planning policy for the improvement of the public realm in this area will provide strong support to the further redevelopment of key sites, helping create a more pedestrian-friendly environment, providing for a better transport environment on Newmarket and

East Roads, and helping re-establish some of the key spaces and routes lost in the 1970's as a result of the large-scale highway interventions. The development of this policy is compliant with National Planning Policy Framework which states, at paragraph 21, that "Local Planning Authorities should....identify priority areas for economic regeneration, infrastructure provision and environmental enhancement". In relation to sustainable modes of transport which this policy is also promoting, the National Planning Policy Framework states at Paragraph 29 that "In preparing local plans, local planning authorities should....support a pattern of development which, where reasonable to do so, facilitates the use of sustainable modes of transport".

221. The City Centre Capacity Study has noted potential for development opportunities including the Grafton Centre area and for public realm and highways improvements. The study also goes into detail about the re-development sites of several sites within this area and in general supports the rationale of including this area as an Opportunity Area in the Local Plan.

Findings of the Sustainability Appraisal of the Cambridge Local Plan (July 2013)

222. Transport and public realm improvements are an important element of the changes proposed for the Eastern Gate Opportunity Area through Policy 22. The quality and character of the area has suffered as a result of unsympathetic development in the 1970s. To address these issues the policy calls for development proposals to realise the potential of underused spaces and to deliver a series of co-ordinated streetscape and public realm improvements. Key projects include the provision of pedestrian/cycle crossings and continuous cycle lanes at Newmarket Road and East Road. These measures should result in positive effects for the area. Nonetheless, the policy could be strengthened by adding a requirement for development proposals in the area to prioritise sustainable forms of transport more generally (e.g. wording in Policy 24: 'promote and co-ordinate the use of sustainable transport modes'). No change was made to policy 22 following this recommendation as if carried through in every possible place within the plan it would be repetitious and would duplicate policy 80 of the plan.

Key Issues raised during Proposed Submission consultation

Policy 22: Eastern Gate Opportunity Area	
Total Representations: 157	
Object: 152	Support: 5
Objections	<ul style="list-style-type: none"> • This policy is tortuous and impenetrable; • There seem to be no caveats in this policy; • Concerned by the wording in Policy 22 that "The character of the area will be enhanced by creating a block structure and developing building forms which moderate the scale and massing of new development in a manner that is responsive to

	<p>their context and reflecting the finer urban grain of the area." What exactly does this mean? We require clarification - and power of veto. By residents, not only by developers. (122 objectors);</p> <ul style="list-style-type: none"> • Criterion (e) - should not include the word 'simple', as this unnecessarily precludes high quality or unusual materials forming part of the work (e.g. through public art); • This opportunity area should be extended North East to include the development and improvement opportunities along Newmarket Road and South to include development and improvement opportunities between East Road and Coldham's Lane bridge over the railway; • Policy should be amended to specifically allow for student residential accommodation; • Any further expansion of student accommodation unbalances the precarious nature of a community. It is important to maintain a balance between student accommodation and those living and working in the community; • The policy includes some appropriate guidance on massing and routes - however key connections which should be established between Harvest Way and Newmarket Road are not identified; • The proposed upper height limit of any potential development at the Wests site is too high, as it dwarfs the finer grain of the adjacent streets within the conservation area, a factor magnified by its position on one of the natural high points of Cambridge. The disaster of the Travelodge and Premier Inn approvals (since acknowledged to have been careless planning oversights), should not be used as justification for further blight. A genuinely transitional structure is required at this location; • Large buildings to the west of Elizabeth Way roundabout will create a psychological boundary between the old city and eastern gate, which is at odds with the general intent of improving connectivity; • There is little evidence yet that section 106 funds from new developments in this area are being saved towards the Eastern Gate; • Figure 3.9 shows 2+1 storey development on St Matthew's Piece in place of current Howard Mallett Centre and car park. This is objected to strongly by many objectors due to: <ul style="list-style-type: none"> ○ St Matthew's Piece (including space occupied by Howard Mallett building and surroundings) was formally granted to residents of Petersfield in 1898 "for the recreation of the inhabitants forever"; ○ Petersfield is considerably under-provided for in terms of accessible green space compared to other wards; ○ There are compelling grounds for a legal challenge to any use of any part of St Matthew's piece for development
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	<p>other than recreational use;</p> <ul style="list-style-type: none"> ○ Any building on St Matthew's Piece is contrary to the Strategic Objectives of the Draft Submission Plan, particularly numbers 12 and 15; ○ The Howard Mallett Centre should be knocked down and returned to green space; ○ The Howard Mallett Centre if retained should provide community facilities for local people.
Support	<ul style="list-style-type: none"> ● In favour of the improvements to the Elizabeth Way roundabout, removing railings and underpasses and improving pedestrian access; ● Support the policy approach taken in the plan and the treatment of the former Howard Mallett site as "white land" which leaves open the prospect of redevelopment for a range of uses that would be acceptable in principle on the site and considered on merit.

Minor Modifications suggested following Proposed Submission consultation and implications for Sustainability Appraisal

223. As a result of assessment, two minor modifications are suggested for Policy 22, both within the first sentence of the second paragraph of the policy and within criterion (e) of the policy. These changes are in the Addendum to the Cambridge Local Plan 2014: Proposed Submission document marked as PM/3/018 and PM/3/019.

224. PM/3/018 (second paragraph, first sentence of the policy) is suggested in response to multiple representations and for clarity. The change reads:

“The character of the area will be enhanced by developing buildings of a scale and massing that responds to context and reflects the predominantly residential nature of the area of a creating a block structure and developing building forms which moderate the scale and massing of new development in a manner that is responsive to their context and reflecting the finer urban grain of the area (building heights are indicated on Figure 3.9).”

225. PM/3/019 is suggested in response to representations (Representation Numbers 26982 and 26930). This change to criterion (e) reads:

“e. use a simple an appropriate and durable palette of materials.”

226. Following consideration of the impact of these changes on the Sustainability Appraisal Framework, it has been concluded that these changes do not materially alter the findings of the Sustainability Appraisal.

Policy 23: Mill Road Opportunity Area

EXISTING POLICY TO BE REPLACED (CAMBRIDGE LOCAL PLAN 2006)	OPTION(S) BEING TAKEN FORWARD FROM THE ISSUES AND OPTIONS REPORT (2012) AND ISSUES AND OPTIONS 2 (2013)	OPTION(S) NOT BEING TAKEN FORWARD FROM THE ISSUES AND OPTIONS REPORT (2012)
Not applicable	Option 37 Mill Road	Not applicable

Key issues raised during Issues and Options (2012) and Issues and Options 2 (2013) consultations:

SECTION OF THE ISSUES AND OPTIONS REPORT (2012)	KEY ISSUES ARISING FROM CONSULTATION
Option 37: Mill Road	<ul style="list-style-type: none"> • Strong support for the option; • Mill Road has a distinctive character; • Need to preserve 'local retail' and prevent too many food and takeaway outlets; • Mill Rd is independent but not diverse; • Too many HMOs in area; • Restrict stores with significant (large) amounts of delivery required – as this blocks road for other users; • More regular road closures – such as is done for the Winter Fair – should be encouraged; • Support for controlling mix and size of units and types of uses strong; • Reduce street clutter in area; • Inadequate cycle parking in the area; • More family houses needed in the area; • Chisholm Trail vital for Mill Road depot housing development; • Good support for housing on the depot site.
NEW OPTIONS ARISING FOLLOWING COMMUNITY INVOLVEMENT	
Not applicable	

Evidence base:

- Arup (2013). Cambridge City Centre Capacity Study

How the policy came about:

227. The background to this policy stems from a long-standing objective of the council, local traders and residents of the area to ensure the continued health

and vitality of Mill Road as a key retail and cultural part of the city. The area also includes several key sites which have redevelopment potential and which could further support the economic vitality of Mill Road. In the Cambridge Local Plan 2006, Mill Road is classified as a District Centre in accordance with Policy 6/7 (Shopping Development and Change of Use in District and Local Centres). This is due to the key role the shops and businesses in the area play in creating a popular, bustling “high street” in this part of the city. There remain however challenges to ensuring the protection of the current businesses in this area and to the quality of the public realm and movement of traffic along, and around, Mill Road itself.

228. The Council’s Issues and Options Report in June 2012 consulted on Option 37 (Mill Road). The thrust of the option was the development of a policy to support the protection and enhancement of the diversity and character of Mill Road through its identification as an Opportunity Area, as well help deliver environmental improvements through measures such as traffic calming and road re-prioritisation.

229. The Interim Sustainability Appraisal Report noted the following about the Mill Road Opportunity Area option:

“An Option to specifically protect and enhance the diversity and character of Mill Road is likely to result in significant positive effects across a number of sustainability topics. In terms of the Communities and Well Being topic this Option should help address the key issues relating to the need to capitalise on the ethnic diversity of the city and realise its contribution to vibrant and inclusive communities. Mill Road already benefits from a number of active community groups which this Option should help support. Specific reference to improving environmental quality for pedestrians and cyclists should also contribute to general improved and safer public realm and encourage more people to walk and cycle. Removal of road markings, signage and other clutter should also contribute to promoting the character and distinctiveness of the road helping address issues relating to townscape. In terms of the key economic sustainability issues, the Option’s reference to rely on the ‘General shopping policy’ (which performed well when appraised) should restrict change of use from small shops to larger units and help maintain the diversity of shopping provision. It will also help directly safeguard independent shops along Mill Road, an identified key issue in the East Cambridge area as identified in the SA Scoping Report.”

230. This policy is supported by Paragraph 21 of the National Planning Policy Framework which states that “Local Planning Authorities should....identify priority areas for economic regeneration, infrastructure provision and environmental enhancement”. In relation to enhancing opportunities for more sustainable modes of transport for Mill Road which this policy is also promoting, the National Planning Policy Framework states at Paragraph 29 that “In preparing Local Plans, local planning authorities should....support a pattern

of development which, where reasonable to do so, facilitates the use of sustainable modes of transport”.

231. The council already works very closely with businesses and residents in an around the Mill Road area, and equally works closely with the County Council as the local Highway Authority. The implementation of this policy will necessarily be a joint effort, and will require public consultation in respect of any improvements to the public realm, as well as a careful approach to the management of development application review in order to protect the special retail character and variety of existing uses on Mill Road.
232. The City Centre Capacity Study provides further detail in respect of redevelopment sites in the area and equally notes the potential for streetscape and public realm enhancement as well as the benefits of improving shop fronts within the area where needed.

Findings of the Sustainability Appraisal of the Cambridge Local Plan (July 2013)

233. Policy 23 seeks to support proposals to improve and refurbish shops and frontages along Mill Road in order to add to the vitality and viability of the street, protect and enhance its unique character, and develop arts and cultural facilities. Large units would be resisted in order to safeguard the independent nature of the shops in the area. Policy 72 sets the policy for changes of use and development at district, local and neighbourhood centres, focussing development to the larger centres in line with the retail hierarchy. The level of retail development proposed and the hierarchical approach to retail development should protect the vitality and viability of the city centre and Mill Road into the future, leading to significant positive effects.
234. A large number of policies set out to provide guidance to developers in areas of major change which may have positive effects on community and wellbeing. These include Policies 17 and 19 (the provision of community facilities, education facilities, local shopping & services, and open space & recreation); Policy 11 (expansion or redevelopment of retail or leisure uses); Policy 15 (establishment of recreation and commercial uses); Policy 18 (provision of community facilities & amenities); Policy 20 (principal land uses to include open spaces and community uses); Policy 21 (shops and services); and Policy 23 (development of arts and cultural facilities). Policy 26 details a list of site specific development opportunities considered suitable for residential, residential moorings, employment, university use or mixed use which should lead to positive effects on community and wellbeing through providing housing, leisure, retail and employment opportunities.
235. Policy 23 (Mill Road Opportunity Area) allocates three sites for residential development and seeks to improve the diversity, vitality and viability of a distinctive area of the city.

236. Mill Road is a district centre that is cherished for the variety of its independent shops and its arts and cultural role. Policy 23 seeks to retain the character of the area by not allowing the amalgamation of small units into larger units, in all but exceptional circumstances in order to support smaller independent traders, which should have the benefit of encouraging diversity and supporting the established businesses that characterise the area. To strengthen the distinctiveness of Mill Road and ensure its long term success and viability, the policy seeks to encourage the development of arts and cultural facilities and intends to deliver a series of co-ordinated streetscape and public realm improvements; including a better pedestrian environment. These measures should help to both support and protect the strong community in the area and aid the local economy thus creating positive effects. However, whilst Mill Road is an extremely busy and narrow road which creates conflicts between cars, buses and cyclists, this issue is not strongly addressed. It is suggested that the policy could be improved by calling for development proposals to improve the environment for cyclists (e.g. wording from Policy 25: 'create safer streets with priority for pedestrians and cyclists') and to prioritise sustainable transport more generally (e.g. wording in Policy 24: 'promote and co-ordinate the use of sustainable transport modes'). No change was made to policy 23 following this recommendation as criterion a while not mentioning cycling specifically already covers these issues.

Key Issues raised during Proposed Submission consultation

Policy 23: Mill Road Opportunity Area	
Total Representations: 32	
Object: 27	Support: 5
Objections	<ul style="list-style-type: none"> • Figure 3.10 - The site (18 Vinery Road), within Policy 23, was assessed in the Strategic Housing Land Availability Assessment (Site ID. 918) and is adjacent to R21. The site is deliverable for residential or mixed use development; • Figure 3.10 - Queen Anne Terrace car park and Kelsey Kerridge buildings should also be included as an opportunity area. These should be considered as key city centre sites for amenity and public facilities in tandem with an urban plan for the Parkers Piece area; • Figure 3.10 - R12 Ridgeons Builders Merchants and areas around it should be included in this opportunity area, or be allocated an opportunity area; • Figure 3.10 - The Chisholm trail (figure 9.1) should be identified on the plan of this opportunity area; • Fig 3.10 - Includes Petersfield Green and Donkey Common as part of the "Opportunity Area". Both are protected green spaces, and should not be considered for any development; • The use of the term 'opportunity' is alarming, both here and elsewhere in the plan;

	<ul style="list-style-type: none"> • Delete residential development from the policy and the associated allocations, particularly due to transport and community infrastructure impact; • Object to the allocation of the R10 Mill Road Depot site. Evidence has not been provided to demonstrate where the existing uses would be accommodated; • The R10 Mill Road Depot site should be explored in terms of its viability for community use; • Proposed development of R10 Mill Road Depot site totally dependent on achieving access; • Creation of open space on the R10 Mill Road Depot site to make up for a shortfall in open space locally; • Both R10 Mill Road Depot and R12 Ridgeons sites have huge problems of contamination; • If the development of R21 315 – 349 Mill Road and Brookfields is to contribute to the aims of Policy 23 to strengthen the distinctiveness and ensure the long-term viability of Mill Road, the masterplanning exercise will need to ensure the following and consider in detail the following issues: <ul style="list-style-type: none"> ○ The masterplan will need to engage with the local community; ○ Green space is a major issue for any proposal for development of R21; ○ The mix of housing (need affordable housing, whilst avoiding too much student housing), and employment is critical; ○ While the intention to concentrate on the public realm is welcome it is unclear how the designation of the whole of Mill Road east of the railway bridge as a 'Neighbourhood Centre' in the Local Plan will go beyond that and support both the economic reality and the urban form of this part of Mill Road. The designation of a 'centre' is logical to the west of the bridge and even as far as the junction of Ross Street and Romsey Terrace as there are more or less continuous shop fronts onto Mill Road; ○ As Mill Road moves eastwards, in the light of the potential development of R21 315 – 349 Mill Road and Brookfields, suggest a more detailed policy on the appropriate mix of uses for this end of Mill Road would be useful in getting the balance right for the current proposed development site; • The Brooks Road end of Mill Road suffers from neglect. The policy should address how to integrate it into the rest of Mill Road, particularly given the potential of the R21 315 – 349 Mill Road and Brookfields site and the new mosque to regenerate it and draw visitors from the west; • Retaining sufficient shopping and services to allow people to shop locally without having to resort to cars; • Practical measures should be introduced to encourage independent small shops by restricting the merging of premises into large outlets. The big national chains and supermarkets
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	<p>should be actively discouraged;</p> <ul style="list-style-type: none"> • There should not be a blanket ban on amalgamation of shop units; • Keeping in check the proliferation of hot food take away shops which attract late night trade causing noise and disturbance to nearby homes; • The plan should include references to using the development opportunities to create more green space as well as cultural facilities in the Mill Road area; • Identification of vacant land on Perowne Street (derelict former garage) which could be used for a local pocket park; • Improvements in the public realm, including traffic flows and street clutter, are needed; • Some are in particularly sensitive conservation areas - for example, but not exclusively the north east side of Station Road; • Protection and enhancement of the unique character of Mill Road is both commendable and important, as the area is currently classified as a conservation area. Policy 23 fails in that objective; • Bharat Bhavan (former Mill Road Library) a grade II listed building, omitted from the plan; • Object because: <ul style="list-style-type: none"> ○ The primary frontage for the Mill Road Depot redevelopment is shown along Hooper Street which should not be used for any vehicular access to the site; ○ Hooper Street is only accessible to vehicles along Ainsworth Street and Sturton Street - both are narrow and effectively single lane due to parked cars; ○ If Kingston Street to Hooper Street pedestrian access was re-opened to vehicles, then vehicles would have to negotiate Gwydir Street or Kingston Street - both effectively single lane due to parked cars and provide a rabbit run from Newmarket Road to Mill Road; ○ All affected roads are heavily used by cyclists. Funnelling additional traffic through these streets would increase danger to cyclists and cause problems for residents across the St Matthew's area; ○ The Mill Road Depot redevelopment should only be allowed if access is direct from Mill Road; • Traffic flows need to be assessed in conjunction with the county's proposal to close part of Hills Road (Lensfield to Station Roads). Taken in combination, this could lead to traffic chaos both on these roads and adjoining arterial roads; • This being an area of high residential density, the pattern of housing and of streets is a very narrow one. Leading to existing long and well identified problems with access, and with congestion, as well as for the safety of all users of Mill Road; • Policy 23 opens the door to changes which could result in the
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	<p>destruction of the community and a 'high quality historic environment' in an attempt to cope with traffic;</p> <ul style="list-style-type: none"> • Improvements are needed for cyclist and cycle parking facilities • Include a policy for late-night short-term parking, possibly on Mill Road itself and specify that illegal late-night parking in residential streets will be taken into consideration; • Tackle the issue of pavement parking on Mill Road, with the issue of deliveries on Mill Road needing to be specifically identified; • Policy omits any details on residential development. Many high-density flats are currently being built without any overall plan, while there is a shortage of family homes. It is essential to conduct a comprehensive masterplanning exercise for the major development sites to ensure provision of adequate family homes and open space.
Support	<ul style="list-style-type: none"> • Strongly support; • Specific sites (R21 315-349 Mill Road and Brookfields, R10 Mill Road Depot, and the R9 Travis Perkins site) should be developed, mainly for housing; • Support the plan to develop better pavements and infrastructure for pedestrians, as well as supporting better frontage and signage on Mill Road; • There are too many difficult to cross junctions, glad this is being addressed; • Mill Road area needs support for independent traders.

Minor Modifications suggested following Proposed Submission consultation and implications for Sustainability Appraisal

237. As a result of assessment, five minor modifications are suggested for Policy 23 and its supporting text and Figure 3.10: Mill Road Opportunity Area. These changes are in the Addendum to the Cambridge Local Plan 2014: Proposed Submission document marked as PM/3/020 - PM/3/024.

238. PM/3/020 is suggested as a change to criterion (e) of the policy in response to a representation (Representation Number 27008) and reflects that there are limited opportunities for increasing the width of pavements, but recognises that improvements still need to be made. The change reads:

“e. create a more comfortable and simplified pedestrian environment by providing improved ~~more generous~~ pavements and more direct crossings that respond to key desire lines; and”

239. PM/3/021 is suggested to criterion (f) of the policy in response to representations (Representation Numbers 26982 and 26930) and to be consistent with representations about Policy 22. This change reads:

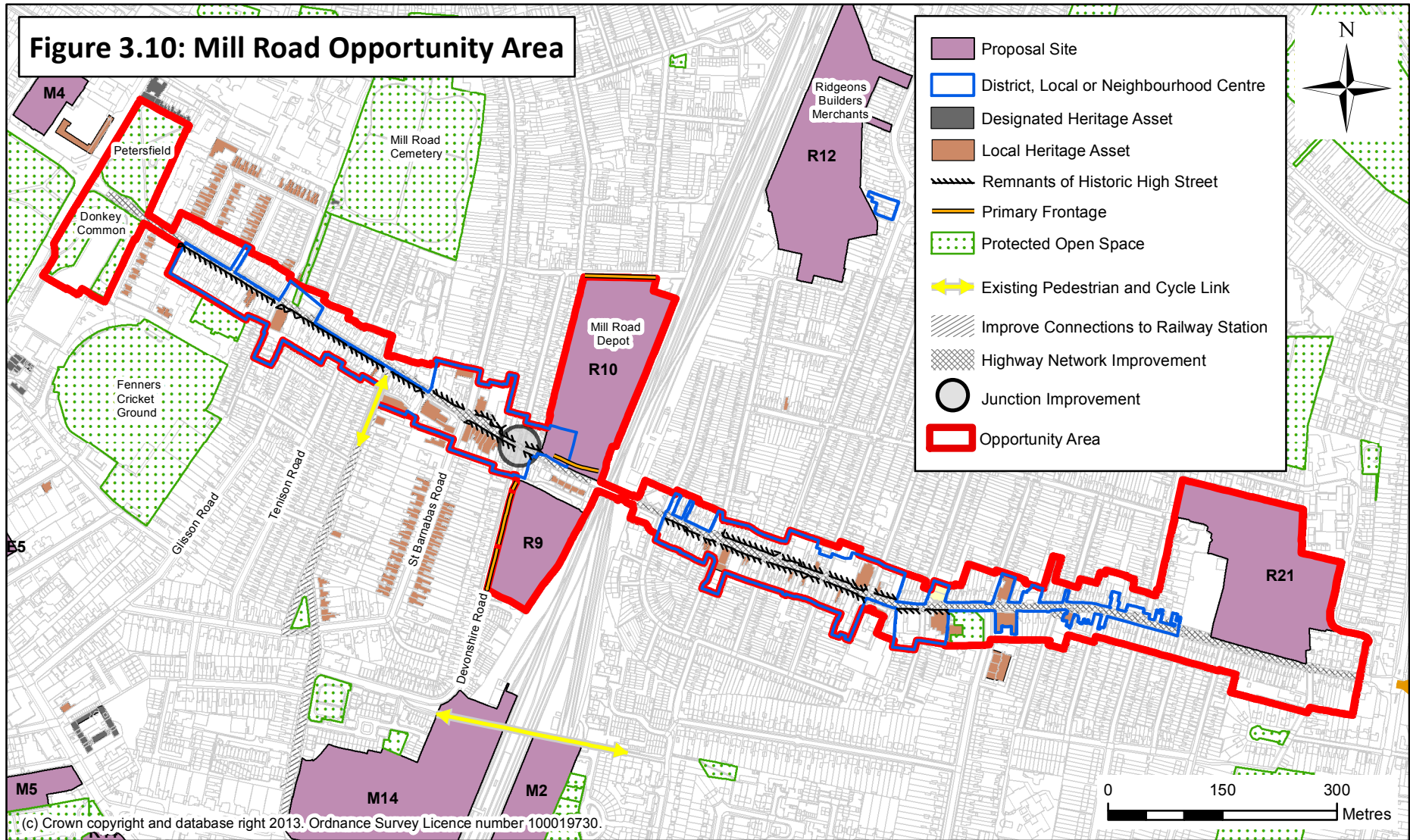
“f. use ~~a simple~~ an appropriate and durable palette of materials.”

240. PM/3/022 is suggested as a change to paragraph 3.96 of the supporting text in response to a representation and in order to use appropriate terminology. The change reads:

“3.96 Mill Road is an extremely busy, narrow road and there are conflicts between cars, buses and cyclists. In places, the pavements are narrow and cluttered with signs, lampposts and parked bicycles, making it difficult to move along them, particularly with a pram ~~or wheelchair~~ or for those who are disabled. The policy seeks to encourage improvements to the public realm and ensure that any development proposals in the area contribute to them.”

241. PM/3/023 and PM/3/024 both relate to changes to Figure 3.10: Mill Road Opportunity Area. PM/3/023 is suggested in response to a representation (Representation Number 27008) and to ensure that the historic importance of the Victorian terraced housing is recognised. This change extends the marking for the ‘remnants of historic high street’ to cover the terraced housing along the northern side of Mill Road between Ditchburn Place and Petersfield Mansions. PM/3/024 is suggested in response to a representation (Representation Number 28051) to ensure that a designated heritage asset, Bharat Bhavan (old library building) is appropriately represented on Figure 3.10. The amended Figure 3.10 is shown overleaf.
242. Following consideration of the impact of these changes on the Sustainability Appraisal Framework, it has been concluded that these changes do not materially alter the findings of the Sustainability Appraisal.

Figure 3.10: Mill Road Opportunity Area



Policy 24: Cambridge Railway Station, Hills Road Corridor to the City Centre Opportunity Area

EXISTING POLICY TO BE REPLACED (CAMBRIDGE LOCAL PLAN 2006)	OPTION(S) BEING TAKEN FORWARD FROM THE ISSUES AND OPTIONS REPORT (2012) AND ISSUES AND OPTIONS 2 (2013)	OPTION(S) NOT BEING TAKEN FORWARD FROM THE ISSUES AND OPTIONS REPORT (2012)
Not applicable	Option 39 Cambridge Railway Station to the City Centre and Hills Road Corridor	Not applicable

Key issues raised during Issues and Options (2012) and Issues and Options 2 (2013) consultations:

SECTION OF THE ISSUES AND OPTIONS REPORT (2012)	KEY ISSUES ARISING FROM CONSULTATION
Option 39: Cambridge Railway Station to the City Centre and Hills Rd Corridor	<ul style="list-style-type: none"> • Good support for this general; • Some concern about impact traffic from CB1 is already having, and will continue to have; • A lot of support for improving conditions for pedestrians, cyclists and public transport; • An SPD for the area is needed; • Remove unnecessary street clutter in the area.
NEW OPTIONS ARISING FOLLOWING COMMUNITY INVOLVEMENT	
Not applicable	

Evidence base:

- Cambridge City Council and Cambridgeshire County Council (2009). Project Cambridge: Connecting the Station to the City Centre.

How the policy came about:

243. The origin of this policy stems from the production of a document prepared in 2009 entitled “Project Cambridge: Connecting the Station to the City Centre”. The document was part of a prospectus written jointly with Cambridgeshire County Council to support a bid to Government for a Tax Increment Financing zone covering the Hills Road area from the rail station to Regent Street. While the introduction of a Tax Increment Financing area has not since happened,

the ideas behind the improvement of this important corridor from the railway station to the city centre are as valid today as they ever were.

244. The 2012 Issues and Options Report consulted on Option 39 (Cambridge Railway Station to the City Centre and Hills Road Corridor). This option identified seven opportunities to improve the public realm of this key corridor to the benefit of those living, working in or moving through the area. Representations received noted the following:

- good support in general for this option;
- some concern about impact traffic from CB1 is already having, and will continue to have;
- considerable support for improving conditions for pedestrians, cyclists and public transport;
- suggestions to remove unnecessary street clutter in the area.

245. The Interim Sustainability Appraisal Report for this option noted the following:

“The proposed public realm improvements at the identified seven key parts of this area would contribute to a safer, more attractive, accessible and integrated public realm. These changes are likely to result in significant positive effects on key community and well being and transport issues. In particular it should help build on the high modal share of cycling and encourage longer journeys by bike. Reducing the confusion for visitors on arriving at Cambridge Station will also help better orientate people and encourage more people to walk to the City Centre helping minimise transport related GHG emissions. This Option should lead to wider regeneration benefits, in particular, helping address areas of health deprivation to the west of Hills Road in the South Cambridge area (as identified in the SA Scoping Report). This Option should also have significant effects in protecting and enhancing shopping provision in Hills Road Local Centre and along Regent Street helping address this key ‘economy’ issue. Furthermore it should also help encourage more sustainable growth of tourism by minimising the pressure tourism places on the City’s transport infrastructure.”

246. The National Planning Policy Framework promotes the role of sustainable transport in “facilitating sustainable development” (Section 4). In Paragraph 21 it states that “Local Planning Authorities should....identify priority areas for economic regeneration, infrastructure provision and environmental enhancement”. The application of a policy to enhance this key corridor will help deliver these high level objectives as contained in the National Planning Policy Framework.

247. The corridor from the existing rail station through to the city centre along Hills Road is the subject of a considerable amount of commuting, given the obvious need of many commuters to access the city centre from the railway station and vice-versa. The area can be very hostile to pedestrians and cyclists in

particular, and the physical environment, particularly the public realm, varies considerably in quality. With the continuing regeneration of the Station Area and in consideration of the proposed new Station Area East and West Area of Major Change, there is a fundamental need to improve the experience and quality of this key corridor for the long term and within the life of this plan. For many first-time visitors to the city their experience of Cambridge is this busy, car-congested corridor on their way to see the historic core, the colleges and the Backs, etc.; very few would argue that this is a positive first experience of the city at present. The designation of this area as an Opportunity allows Cambridge City Council and Cambridgeshire County Council (in its role as Highway Authority) to plan proactively for this area and to secure planning obligations for the funding of the key projects. The application of a specific policy will provide a first step in addressing the long-term need of improving this area as a vital corridor to and from the city centre and its main transport interchange at the rail station.

248. The City Centre Capacity Study notes the potential for commercial and residential development in the area as well as streetscape and public realm improvements, which accords with the approach taken in this policy.

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249. Another area of the city centre requiring improvements to transport and the public realm is the Cambridge Railway Station, Hills Road Corridor. Streets and junctions within the area are congested with traffic and pedestrians experiencing a poor quality public realm. Given these issues, Policy 24 calls for development in this area which results in an improved, high quality green link connecting the city centre to the station, including a pedestrian and cycle route. This should result in positive effects in terms of accessibility, and wider benefits in terms of an improved environment. This policy could however be improved by making explicit the need for improvements to the environment for cyclists as an element of the coordinated streetscape and public realm improvements that development proposals are to deliver (e.g. wording from Policy 25: 'create safer streets with priority for pedestrians and cyclists'). No change was made to policy 24 following this recommendation as criterion a while not mentioning cycling specifically already covers these issues.
250. Policy 24 refers to the local centre on Hills Road, the proposed centre at the station area and linkages to Cambridge Leisure Park. The policy aims to deliver and reinforce a sense of place through streetscape and public realm improvements including key projects which seek to promote the character and distinctiveness of the area. Through the place-specific Opportunity Area policies that seek to retain and enhance what makes these areas special the Local Plan should lead to significant positive effects in terms of maintaining the character of particular neighbourhoods in the city.

Key Issues raised during Proposed Submission consultation

Policy 24: Cambridge Railway Station, Hills Road Corridor to the City Centre Opportunity Area	
Total Representations: 19	
Object: 16	Support: 3
Objections	<ul style="list-style-type: none"> • Opportunity area should be extended to encompass 1 Regent Street and Furness Lodge; • Queen Anne Terrace car park and Kelsey Kerridge buildings should also be included as an opportunity area. These should be considered as key city centre sites for amenity and public facilities in tandem with an urban plan for the Parkers Piece area; • Do not agree with the Policy 24 heading describing it as a "...Corridor to the city centre"; • Criterion (b) - There is potential to add improved pedestrian/cycle connection directly north of the guided busway onto Hills Road bridge, to compliment item 'J' identified on the map and improve connectivity and infrastructure in the area; • Criterion (b) - Object to (b) 'place-making' over vehicle movement - at least in respect of the Railway Station; • Criterion (h) - Hills Road centre should be upgraded to a District Centre, or this area to be given a specific 55% or 60% percentage in A1 use protection; • Criterion (j) - It is not clear what 'upgrading the existing link' means, or what provision other than a new bridge would constitute 'a high quality connection', i.e. that is short, safe and disability friendly; • Figure 3.11 - Cambridge Leisure site's central space should not qualify as protected open space on recreational or environmental grounds; • Insert a requirement to consult with, and listen to, local residents; • The allocation of these sites for purely employment related uses is not the most appropriate strategy for a number of reasons, including; viability reasons, the provision of active frontages onto Hills Road, the delivery of sustainable development, evidence of the need for new retail and leisure land uses in the specific area; • Request that site allocation E5 1 and 7-11 Hills Road be extended to encompass the properties owned by Cambridge Assessment at 1-4 Hills Road and at 13 Harvey Road (Drosier House) and be for mixed use; • Address potential knock-on consequences as the consequences for traffic flow through and access to residential areas will be considerable; • Must address effectively and enforce loading/parking restrictions, school drop off, commercial vehicles stopping in appropriate locations;

	<ul style="list-style-type: none"> • Must address effectively and enforce taxi movement; • Efforts should be made to reduce the number of pedestrian crossings on Regent Street and Hills Road; • This section fails adequately to recognise that this area is a major cycle route; • There does appear to be a conflict between the city's approach to traffic on the Hills Road corridor and that of the County Council's Draft Transport Strategy; • The plan should be amended to require this on-street parking on Station Road and Regent Street to be removed to the benefit of buses, pedestrians, cyclists and other traffic; • The plan policy should restrict the current use of residential streets (particularly Tenison Road, St Barnabas Road and Devonshire Road) by private cars and hire vehicles for access to/from the Railway Station.
Support	<ul style="list-style-type: none"> • General support • Criterion (k) – Support - The provision of a mixed use zone may help underpin the delivery of the proposed bridge link and a new eastern station entrance for Cambridge Station by preventing the redevelopment of existing employment buildings for other more appropriate uses. The redevelopment of the Clifton Road Industrial Estate should provide an opportunity of realise this aspiration. • Wider pavements to encourage pedestrian usage between city centre and station is welcome; • Improvement of safety for pedestrians and cyclists, prevention of the amalgamation of shop units, and general refurbishment are all to be welcomed. Most important to keep independent traders alive; • Some support including upgrading the link into the Leisure Park and the remodelling of the Cherry Hinton Road junction.

Minor Modifications suggested following Proposed Submission consultation and implications for Sustainability Appraisal

251. As a result of assessment, a minor modification is suggested for Policy 24, criterion (e). This change is in the Addendum to the Cambridge Local Plan 2014: Proposed Submission document marked as PM/3/025. This change is suggested in response to representations (Representation Numbers 26982 and 26930) and to be consistent with changes to Policy 22. This change reads:

“e. use ~~a simple~~ an appropriate and durable palette of materials.”

252. Following consideration of the impact of this change on the Sustainability Appraisal Framework, it has been concluded that this change does not materially alter the findings of the Sustainability Appraisal.

Policy 25: Old Press/Mill Lane Opportunity Area

EXISTING POLICY TO BE REPLACED (CAMBRIDGE LOCAL PLAN 2006)	OPTION(S) BEING TAKEN FORWARD FROM THE ISSUES AND OPTIONS REPORT (2012) AND ISSUES AND OPTIONS 2 (2013)	OPTION(S) NOT BEING TAKEN FORWARD FROM THE ISSUES AND OPTIONS REPORT (2012)
Policy 7/5 Faculty Development in the Central Area, University of Cambridge	Option 143 Continued development and redevelopment of the University of Cambridge's faculty sites	Not applicable

Key issues raised during Issues and Options (2012) and Issues and Options 2 (2013) consultations:

SECTION OF THE ISSUES AND OPTIONS REPORT (2012)	KEY ISSUES ARISING FROM CONSULTATION
Option 143: Continued development of University of Cambridge's Faculty Sites	<ul style="list-style-type: none"> • Essential that the Council continues to support the University of Cambridge which supports Cambridge's economy, social and cultural life and environment; • Support further faculty development provided the option is monitored; • North West Cambridge will prove to be very sustainable for students; • Strongly support but add Madingley Rise to list of faculty sites; • Support but should also support other Higher and Further Education colleges such as Westminster College and Abbey College; • Mill Lane is a prime site for more student accommodation as part of mixed use; • The University of Cambridge should downsize as it has outgrown the nest; • The Colleges equally contribute to economy as they have their own governance, property and staff; • Addenbrooke's has grown enough; • North West Cambridge and West Cambridge developments do not meet the needs of the Colleges in the city centre.

Evidence base:

- Cambridge City Council (2010). Old Press/Mill Lane Supplementary Planning Document;
- Cambridge City Council and the University of Cambridge Estates Management and Building Service (2009). Old Press/Mill Lane Supplementary Planning Document Options Appraisal Summary Report.

How the policy came about:

253. The potential for the future development and/or redevelopment of the Old Press/Mill Lane site was recognised in the Cambridge Local Plan 2006. In terms of specific area-based policies and allocations, the site was partly identified for a University-led mixed-use development in the Local Plan (Site 7.10) and was the subject of policy 7/5, Faculty Development in the Central Area, University of Cambridge. This allows further development or redevelopment of the University of Cambridge's faculty and administrative sites in the central area, including the Old Press/Mill Lane site, if this allows improved facilities, a reduction in parking spaces, improvements to external environment and amenity space, and better use of land.
254. The production of a Supplementary Planning Document (SPD) for the site was also identified within the Council's Local Development Scheme. The council and the University of Cambridge set up a joint working group to aid the production of an SPD in Summer 2007. Background studies and research, stakeholder workshops and an appraisal of potential development options took place from Autumn 2007 until September 2008. The SPD was the subject of public consultation for a period of six weeks from 23rd February until 6th April 2009. After consideration of representations and any necessary changes, the SPD was subject to final consideration by the council's Environment Scrutiny Committee and approval by the Executive Councillor for Climate Change and Growth in January 2010.

Development Options

255. In identifying potential areas of change within the site and opportunities for adaptive reuse, the Project Team drew up a range of development options for discussion at the 2nd stakeholder workshop. These options ranged from a scheme based predominantly on the reuse of existing buildings to an option involving a more significant proportion of redevelopment of the northern block between Mill Lane and Silver Street. These options were indicative only and were intended to inform discussion at the stakeholder workshop. They also allowed the Project Team to assess the quantum of development potentially appropriate for the site.
256. This assessment of the quantum of development and viability, together with the Project Team's assessment of the options following the 2nd stakeholder workshop informed the SPD's development principles. The Project Team,

comprising officers from the council and the University of Cambridge and their consultancy team, considered each proposed option and appraised it based on a range of criteria, including compliance with planning policy; sustainability; transport; public realm; conservation of the historic environment and viability. A summary of the option appraisal exercise is available as a background document.

257. In carrying out the background research for the production of the SPD and undertaking consultation with stakeholders, a number of opportunities and constraints emerged. These were summarised as follows:

<p>Constraint A: Traffic and Transportation</p> <ul style="list-style-type: none"> a. Pedestrian/cycling/vehicular conflict both within and on streets surrounding the site; b. Lack of permeability and connectivity within the site; c. Inadequacy of existing servicing arrangements; d. Lack of cycle parking; e. Poor quality of access for those with disabilities. 	<p>Opportunity A: Traffic and Transportation</p> <ul style="list-style-type: none"> a. To prioritise walking and cycling as modes of transport within the site and improve permeability for pedestrians and cyclists; b. To improve access to the waterfront; c. To rationalise and reduce car parking and improve servicing arrangements/ facilities; d. To improve external junctions/crossings for pedestrians, cyclists and motor vehicles; e. To introduce shared spaces.
<p>Constraint B: Public Realm</p> <ul style="list-style-type: none"> a. Poor quality/lack of uniformity of surface materials and street furniture in public realm (roads, pavements, lampposts, seats etc); b. Lack of legibility e.g. signage/interpretation; c. Lack of suitable waste storage facilities (particularly Laundress Lane); d. Lack of public space within the site and restricted access to the waterfront. 	<p>Opportunity B: Public Realm</p> <ul style="list-style-type: none"> a. To improve the quality of the streetscape (material, street furniture etc); b. To create new public spaces (courtyards, squares, etc); c. To improve hard and soft landscaping; d. To improve legibility (gateway features/way-finding/interpretation boards); e. To introduce public art.

<p>Constraint C: Land Use</p> <ul style="list-style-type: none"> a. Lack of vibrancy in parts of the site during the evening as a result of existing mix of uses; b. Lack of facilities for visitors. 	<p>Opportunities C: Land Use</p> <ul style="list-style-type: none"> a. To introduce more ‘active’ uses to create vibrancy during day/evening and at all times of year; b. To promote a wider mix of uses including residential, retail, employment and hotel uses through the adaptive reuse of existing buildings and redevelopment of others; c. To promote public safety and sustainability in its widest sense.
<p>Constraint D: Heritage/Townscape</p> <ul style="list-style-type: none"> a. The importance of heritage features within the site and the contribution they make to the City’s historic core; b. The lack of a sense of place/destination; c. The unsuitability of some older buildings to meet modern day needs. 	<p>Opportunities D: Heritage/Townscape</p> <ul style="list-style-type: none"> a. To protect and enhance the setting of Listed Buildings, the Conservation Area and other important heritage features; b. To create an identity, a sense of place – a vibrant riverside quarter; c. To create an environment of highest quality as part of any new development or redevelopment; d. To create a vantage point.

As a result of the identified opportunities and constraints, a vision for the SPD was formulated to guide the future development of the site:

- 258. The Old Press/Mill Lane site provides an opportunity to create an area with a distinctive character that combines high quality buildings, streets and spaces, and responds well to its context through sensitive enhancement. It will contain a mix of uses that complement the City’s historic core and its riverside location. Development will support the creation of a more attractive, accessible, safe and sustainable environment.
- 259. In bringing forward the vision, it was established in the SPD that the development objectives for the future development of the site should seek to:
 - a. preserve and/or enhance the special historic character and appearance of the Conservation Area both within and outwith the site, including its Listed Buildings and their settings;
 - b. create the opportunity for the adaptive reuse of existing buildings where possible;

- c. create the opportunity for redevelopment to provide high quality, sustainable new buildings of innovative design which contribute positively to the character of the conservation area and the setting of listed buildings;
- d. introduce a range of complementary and compatible land uses;
- e. create and enhance areas of public open space and public realm to a high quality, potentially including a new public space fronting onto the river;
- f. improve permeability through the site and create safer streets with priority for pedestrians and cyclists;
- g. minimise non-essential car parking and improve servicing; and
- h. provide high quality, well designed areas of cycle parking.

These development principles are to be reflected in the criteria of the policy.

260. In terms of greater detail on particular issues for the sites, the criteria reflected key areas, including urban form and reuse/redevelopment of buildings, land uses, access and movement, an the public realm:

Urban Form and Buildings

261. The development of the site should create high quality streets, spaces and buildings informed by the existing layout, scale and grain of development on site and in the surrounding area. As the future development on the site will be achieved through a combination of the adaptive reuse of existing buildings as well as through new development, the success of any scheme will be based on the sympathetic integration of any new and existing buildings. Development will be required to demonstrate high standards of design and architectural quality that enhance the site, the setting of adjoining and nearby listed buildings and the surrounding Central Conservation Area.
262. Where demolition to facilitate new development or alteration of an existing building is proposed, consideration must be given to how this development will preserve and/or enhance the character and appearance of the conservation area, listed buildings and their settings. Any applications proposing the demolition and redevelopment and/or alteration of buildings within the site must be accompanied by a detailed justification for the works proposed in the context of current policy and guidance on such matters. The site contains and is surrounded by buildings of considerable historical and architectural significance, many of which are listed Grade I and II*, within the Central Conservation Area.

Land Uses

263. Development should comprise a complementary mix of land uses to create an attractive and lively environment that is well used through the day and during the evening. In addition to University uses, the uses outlined in the table below were considered to be acceptable in this area and were included within

the SPD, subject to the effective operation of the area’s highway network and the amenity of the local environment.

Land Use	Indicative Floorspace/Units
Residential	Up to 150 units Note: If student residential is provided, there is the potential for up to 200 student residential units or the equivalent square metreage in student accommodation.
Commercial	Up to 6,000 square metres
Hotel	Up to 75 bedrooms
Other (excluding Retail)	Up to 1,000 square metres

264. The Project Team undertook analysis of the potential scale of development for the site. This work identified potential for around 5,600 square metres (Gross External Area or GEA) of adaptive reuse plus around 15,400 square metres (GEA) through new build development. The quantum of development identified for each use was indicative and was derived from an assessment of the development potential of the site taking into account the following issues:

- Buildings that should be retained due to their historic/architectural importance;
- Planning policy relevant to the site and surrounding area;
- Potential scale and massing of new buildings, having regard to the need to preserve and/or enhance the character and appearance of the Conservation Area, the scale of surrounding buildings and the setting of listed buildings;
- Market interest for different land uses, having regard to existing and planned accommodation in the city³;
- The viability of mixed-use development options;
- The aspirations of the University of Cambridge, the council and other stakeholders (e.g. enhancing public realm);
- Feedback from the stakeholder workshop events held in January and July 2008;
- Appraisal of the preferred options by the council and the University of Cambridge and their advisors in September 2008.

265. The appropriateness of a precise quantum of development will need to be demonstrated by the applicant in relation to the site’s context and current national, regional and local policy guidance. For the purposes of the initial work on the quantum of development, Miller’s Yard, which is outside the University’s ownership, and the Pitt Building and University’s Lecture Halls,

³ A view was taken of future market interest given the current market conditions that exist in Cambridge and the rest of the UK in 2008.

which are expected to remain in their current uses for the foreseeable future, were excluded from the space calculations.

266. Residential development will be the largest single new use on the site with up to 150 units. This is an indicative figure dependent on type, size and mix of units and ancillary facilities, and the relationship of the development with its context. Given the town centre location and the highly accessible nature of the site, it is anticipated that residential development, which could comprise market, affordable and/or student housing, will be high density and provided principally through new build development. Schemes for student housing will be determined subject to the relevant policies of the Local Plan on such development. Where residential development is provided as student residential, the number of units could increase to 200 units to reflect their smaller unit sizes.
267. There should be no significant increase on the existing level of retail floorspace on the site. If the developer requires a significant increase on this level of retail floorspace, they will need to justify this in any planning application in terms of the need for such floorspace and the contribution that this form of development will make to the area's sense of place. Where new retail units are introduced, they should be small scale to encourage a mix of different types of retail and other uses. In order to minimise adverse effects on the amenities of residents within and in the vicinity of the site, the focus of any such uses will be around any new public spaces created within the site, adjacent to the Mill Pit and on Mill Lane.
268. There is scope to introduce a wider range of commercial uses (Use Class B1) within the site including office and research and development type uses. Given the location and nature of the site, creative industries, including craft workshops, are considered to have particular potential to support the enhancement of the area. Up to 6,000 square metres of commercial uses could be accommodated. This is likely to be principally through the adaptive reuse of existing buildings. If the developer requires a significant increase on this level of commercial floorspace, they will need to justify this in any planning application.
269. The popularity of Cambridge and this area in particular as a destination for visitors suggested that a hotel of up to 75 bedrooms may be an appropriate use within the site and could be achieved through a combination of adaptive reuse and/or new build. Such a use will only be acceptable where on-site parking is restricted to a very limited number of spaces for use by guests with disabilities, and it can be demonstrated that access and servicing for the hotel can be accommodated satisfactorily within the existing road network of the area. Given the City Centre location, guests should be encouraged to use sustainable modes of transport, where possible.

Public Realm

270. All redevelopment proposals should seek to support new and/or improved areas of public realm within the site that, whether hard or soft landscaped, should enhance the setting of Listed Buildings and the character of the Conservation Area, and add a greater degree of interest to the streetscene. Furthermore, no development proposal should have a detrimental impact upon the wider setting of the site, including the green corridor formed by the River Cam and the surrounding Greens and Fens.
271. The location of public spaces should relate to the main pedestrian routes in order to allow visual enjoyment of the spaces, this would also provide improved safety/security to these areas resulting from surveillance offered by regular pedestrian movement. New buildings should be outward facing with active frontages at street level to enhance the vitality and vibrancy of the area and to overlook the streets and public spaces in a way that creates a sense of interest and enhances public safety.
272. New development should seek to strengthen the existing character of this area and the potential exists to improve the site's relationship with the River Cam and the Mill Pit. Subject to detailed assessment and justification of the loss of any existing buildings, this could be achieved by opening up the river frontage through the creation of a new public space.
273. Improvement to the streets and open spaces should support the sense of local distinctiveness, and may be enhanced by using well-designed and appropriate street furniture, lighting and signage. Lighting should be appropriate to the site's sensitive location on the urban edge.

Access and Circulation

274. On Mill Lane and Granta Place, this could include the provision of a shared space environment in order to slow motorised vehicles and provide a better quality environment for pedestrians and cyclists. Several examples of shared space schemes, which serve as working examples, have been implemented in the UK, including New Road in Brighton. On Silver Street, a number of incremental changes could take place independently of each other or together and could involve changes to the positioning of unsympathetic extensions to the Anchor public house in order to widen the pavement and the creation of a boardwalk from Silver Street in front of the Anchor public house down to the Mill Pit. Whilst these changes on their own could bring about minor public realm improvements to parts of the site, the greatest potential for change relates to the gradual closure of Silver Street to vehicular traffic. Silver Street and Trumpington Street are currently subject to traffic demand management measures and further restrictions on car-based access may need to be considered to enhance access for sustainable forms of transport. Linked to further traffic restraint measures, there is an opportunity to consider

significant changes to the streetscape in these streets to achieve greater road space allocation for pedestrians and cyclists.

275. Conflict exists between pedestrians and cyclists and other road users at the junctions of Mill Lane/Trumpington Street/Pembroke Street, Mill Lane/Granta Place, Laundress Lane/Mill Lane, Laundress Lane/Silver Street and the corner of Silver Street/Trumpington Street. As well as improvements to accessibility and permeability within the Old Press/Mill Lane site itself, there is scope for transport improvements to be made to the wider area to encourage the use of more sustainable modes of transport and create a more pleasant environment for pedestrians and cyclists. As the local planning authority, the council can influence transport conditions through the control of development, for example through the introduction of tighter car parking standards to encourage a modal shift away from car use. However, the implementation of improvements to the public highway is the responsibility of Cambridgeshire County Council as the Highways Authority. The council will continue to work closely with Cambridgeshire County Council and other partners in order to encourage the introduction of further measures around the Old Press/Mill Lane site through the Transport Strategy for Cambridge and South Cambridgeshire. Any offsite highway improvements needed to address current problems of congestion and highway safety will be carried out as part of the Cambridge Core Traffic Scheme.
276. Development should include provision for servicing, where appropriate. It is acknowledged that the site currently has constrained space for servicing and that the adaptive reuse of existing buildings may not offer considerable improvements. Whilst the Council would wish to see servicing of uses on site limited to off-peak hours; different methods of servicing (e.g. Envac); and the use of smaller servicing vehicles, new build development should offer the opportunity to enhance servicing provision.

Local Plan Review

277. Option 143 on the continued development and redevelopment of the University of Cambridge's faculty sites formed part of the Issues and Options report in Summer 2012. This policy option suggested identifying Old Press/Mill Lane site as an area where an element of mixed use would be supported in order to enhance the attractiveness of the public realm. This would be similar to existing Local Plan policy 7/5 in the Cambridge Local Plan 2006.
278. The University of Cambridge believes the current Local Plan (2006) policies provide a flexible and sustainable framework for the continued growth of faculty development in the City Centre at Old Press/Mill Lane. This was identified in the last Local Plan and in the University's Estate Strategy produced in 2007 and is an approach that continues to be supported by most consultees. The University of Cambridge is now focusing upon guiding future development by means of a Capital Plan, rather than an Estate Strategy. This seeks to

optimise the use of all existing space and investments. The University expects that its core academic needs will be met by the intensification and better use of its existing sites over the period up to 2031. The current Local Plan policy provides a useful and appropriate focus on key sites.

279. In addressing the need to allocate sites in the new Local Plan, the council also consulted on Site U1 Old Press/Mill Lane within the Issues and Options 2: Part 2 consultation in January and February 2013. The inclusion of this site as an allocation was supported by a large majority of respondents. The key issues raised were the need for development to take advantage of opportunities offered by the site and respect the historic environment; the potential for mixed use; and traffic and access, especially at Trumpington Street junctions. The consultation raised no issues not identified in the Issues and Options 2 - Part 2 report.
280. The City Centre Capacity Study notes the potential for public realm improvements in the Mill Lane area, including the potential for shared surfaces as well as creating a tourist loop along the River Cam up to Magdalene Street.

Findings of the Sustainability Appraisal of the Cambridge Local Plan (July 2013)

281. Policy 25 requires development proposals to preserve and enhance the special historic character and appearance of heritage assets, including the Conservation Area and listed buildings and their settings in the Old Press/Mill Lane Opportunity Area. This approach should lead to positive impacts in terms of requiring new development to promote the character and distinctiveness of the conservation area.
282. Policies focused on 'green infrastructure' should lead to biodiversity benefits. These include Policy 16 (landscaping & buffer areas); Policy 17 and Policy 19 (open space and recreation including allotments); Policy 20 (open green spaces in the Station West area); and Policy 25 (the creation and enhancement of areas of public open space). These policies could potentially be improved by making explicit the need to consider such spaces as a part of a wider green infrastructure network across the City. No change was made to policy 25 following this recommendation as if carried through in every possible place within the plan it would be repetitious and would duplicate policy 68 of the plan.
283. In the historic core of the city is the Old Press/Mill Lane Opportunity Area. This area is the subject of Policy 25, which notes that as the University of Cambridge is interested in relocating some of its activities away from the site this presents a number of opportunities. The policy recognises that these include the chance for new development to enhance the public realm and the setting of heritage assets; address existing conflicts between vehicles and pedestrians; and reuse and redevelop buildings for a range of land uses. A

focus on both preserving and enhancing the special historic character of this area, and achieving complementary and compatible land uses should result in positive effects. In addition, the policy is strong in terms of its support for sustainable transport, calling for a minimisation of non-essential car parking; the provision of high quality, well designed areas of cycle parking; and the creation of safer streets with priority for pedestrians and cyclists; with further positive effects.

Key Issues raised during Proposed Submission consultation

Policy 25: Old Press/Mill Lane Opportunity Area	
Total Representations: 11	
Object: 6	Support: 5
Objections	<ul style="list-style-type: none"> • Creating 150-200 residential units and a hotel is incompatible with policy criterion (f); • Principle of streetscape improvements is supported, but reference needs to be made to the Pembroke Street/Mill Lane as a heavily-used cycle route; • Proposals to limit traffic flow in Trumpington Street may affect the viability of the congregation of the Emmanuel United Reformed Church in the long term; • Development would likely impact private residences on Little St Mary's Lane. It would be important that the development not result in loss of privacy and amenity by these residences being overlooked by hotels/student accommodation/shops; • It would be appropriate to include in the supporting text a commitment to review the parameters in the SPD as part of the local plan process, and to ensure that such development would be appropriate in the context the NPPF; • In Section 3.105 we would like the masterplan to include an initial assessment on pollution risks and proposed mitigation measures. This would ensure that drainage and remediation issues do not frustrate the process later on; • Masterplan needs to be put in place as soon as possible to coordinate likely piecemeal development. The University of Cambridge should be encouraged to consult on any development plans at an early stage.
Support	<ul style="list-style-type: none"> • The University of Cambridge supports the policy for the Old Press/Mill Lane Site, which identifies the need for a masterplan to be prepared and used to support future development. Development thresholds identified in the Supplementary Planning Document (2010) are indicative, as written in paragraph 3.102, and will need to be tested through masterplan preparation and amended, where appropriate; • General support for masterplan approach.

Minor Modifications suggested following Proposed Submission consultation and implications for Sustainability Appraisal

284. As a result of assessment, a minor modification is suggested for the table below paragraph 3.102 in the supporting text for policy 25. This change is in the Addendum to the Cambridge Local Plan 2014: Proposed Submission document marked as PM/3/026. This change is suggested for clarity. This change reads:

“Table 3.1: Indicative floorspace/units”

285. Following consideration of the impact of this change on the Sustainability Appraisal Framework, it has been concluded that this change does not materially alter the findings of the Sustainability Appraisal.

Policy 26: Site specific development opportunities

EXISTING POLICY TO BE REPLACED (CAMBRIDGE LOCAL PLAN 2006)	OPTION(S) BEING TAKEN FORWARD FROM THE ISSUES AND OPTIONS REPORT (2012) AND ISSUES AND OPTIONS 2 (2013)	OPTION(S) NOT BEING TAKEN FORWARD FROM THE ISSUES AND OPTIONS REPORT (2012)
Not applicable	Not applicable	Not applicable

Key issues raised during Issues and Options (2012) and Issues and Options 2 (2013) consultations:

Cambridge City Council, South Cambridgeshire District Council Issue and Options Consultation on Broad Locations in the Green Belt	
Question / options no.	SUMMARY OF REPS
<p>7. Land between Babraham Road and Fulbourn Road (includes land in both districts)</p> <p>City: Support: 5 Object: 38</p> <p>SCDC: Support:6 Object: 69 Comment: 3</p>	<p>ARGUMENTS IN SUPPORT:</p> <ul style="list-style-type: none"> • Logical extension to City without compromising neighbouring necklace villages; • Could help meet housing and employment development needs of Cambridge; • Deliverable in plan period; • Could provide for up to 4,000 new homes in a sustainable location close to the jobs at the Addenbrooke’s Hospital, Marshalls and ARM; • Would allow for expansion of Peterhouse Technology Park; • Can provide significant open space and recreation areas; • Well landscaped sensitive development acceptable;

**Cambridge City Council, South Cambridgeshire District Council
Issue and Options Consultation on Broad Locations in the Green Belt**

Question / options no.	SUMMARY OF REPS
	<ul style="list-style-type: none"> • Already compromised; • Could minimise the starkness of Addenbrooke’s; • Low lying land development would have less impact. <p>OBJECTIONS:</p> <ul style="list-style-type: none"> • No exceptional case exists to justify more Green Belt development; • No need for development here, development can be accommodated elsewhere in Cambridge and South Cambridgeshire (in the City, at new settlements and in villages); • Harmful to Green Belt purpose of protecting the character and setting of a historic city, development in Green Belt villages would be less harmful; • New development would detract from the historic character of Cambridge; • Very important to the special character and setting of Cambridge as elevated with important views; • Majority of land is elevated with important views - development could not easily be screened from other vantage points; • Worts’ Causeway and minor road over hill towards Fulbourn provide a well-used route for leisure access to countryside and development along this corridor would have a significant negative impact; • Harmful to setting and character of Fulbourn; • Contrary to the conclusions of earlier Green Belt studies and to those of the Inspector when considering proposals for housing at Netherhall Farm in 2006; • Important for amenity and recreation; • Impact on tranquillity of the countryside; • Impact on traffic; • Harmful to views from the Gogs and Wandlebury and of high landscape value; • Damage to biodiversity and Nature Reserves. <p>COMMENTS:</p> <ul style="list-style-type: none"> • The part of the area either side of Worts’

**Cambridge City Council, South Cambridgeshire District Council
Issue and Options Consultation on Broad Locations in the Green Belt**

Question / options no.	SUMMARY OF REPS
	<p>Causeway which is on level ground would seem to be the most unobtrusive of all the sites.</p> <ul style="list-style-type: none"> • Minor development on non-elevated land would be acceptable if the done with sensitivity to preserve the best of the landscape.

Site Number: GB1 Land North of Worts Causeway	
	KEY ISSUES ARISING FROM CONSULTATION
Objections GB1	<p>Green Belt</p> <ul style="list-style-type: none"> • Loss of Green belt /creates precedent (10) • If Green Belt is used it can never be replaced (2) • Cumulative impact of loss this and other green belt land represents a 30% loss (1) • It will cause fundamental harm/impact upon the green belt (77) • Unjustified breach of Green Belt policy (5) • There is a wrongful assertion that GB1 and 2 are of low environmental value. The NPPF doesn't discriminate in this way.(1) • NPPF Para 83 provides for Green Belt boundary changes only in "exceptional circumstances" The Council has not presented a compelling case as to why this constitutes exceptional circumstances (10) • Needs of economy don't require exceptional circumstances (1) • Contravenes stated purpose of Green Belt as defined in NPPF in failing to check unrestricted sprawl, safeguarding the countryside from urban encroachment, which would further contribute to the destruction of the special character of an historic town. (2) • Area was not allowed to be developed in 2002 LDA Green Belt Boundary Study (1) • Reasons for designating it Green Belt have not changed (3) • Further attempts to move green belt boundaries will be subject to legal challenge (1) • This area must be the highest value Green Belt and is vital for keeping Cambridge attractive and compact. (4) • Object to development in green belt but site has minimal impact and good access to local services (1)

	<ul style="list-style-type: none"> • This is arguably the best landscape in the City (3) • It is the landscape which makes City attractive not its housing estates (1) • Will run risk of unrestricted sprawl extending/encroaching upon open countryside beyond this site toward the Gogs (45) • Area forms important visual and physical buffer between urban edge and higher ground (71) • Soft green edge works and should not be compromised (34) • The development of these forelands will destroy the iconic status of area (1) • Represents an unspoilt gateway to open countryside even a small number of dwellings will change this ambience (1) • Land at base of Gogs is visually important and contributes to setting of City when viewed from south (1) • As you come over the hill the City appears and is largely unspoilt (1) • The Gogs are the only hilly feature in an otherwise singularly flat landscape (1) • Impact on views of Beech Woods (6) • Impact on views from and to the Gogs (8 + 1) • Paths provide safe access to Beech Woods and the highest public space in Cambridge (1) • Impact on views across Cambridge (11) • Visual impact will differ vastly from what is there now (2) • Impact on setting of Cambridge (7) • Development of Green Belt will lead to coalescence of villages which would lose their identify (3) • The integrity of necklace villages should be preserved at all costs and they should not be subsumed into the City (1) • Will destroy City's historic compact scale (1) • Green belt must remain for physical, emotional, mental and spiritual health as well as environmental reasons (6) • Building in the green belt will harm the attractiveness of Cambridge and thereby hamper economic growth (5) • Sir William Wort gifted this land in perpetuity in 1709 so that Cambridge scholars could be coaxed into the countryside and enjoy the view (1) • Green Belt should be more valuable and protected
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	<p>as population of our small city densifies (2)</p> <ul style="list-style-type: none"> • Impact of other housing on outskirts of Cambridge has yet to be evaluated (1) • The Council’s 2012 Green Belt Review comments at para 3.4 “that where the city is viewed from higher ground or generally has open aspects...it cannot accommodate change easily” This is a clear instance of a view from higher ground. • The area is important for passive recreation <p>Natural Environment Biodiversity</p> <ul style="list-style-type: none"> • will have unacceptable adverse impact on the local ecological network including SSSI’s, County and City Wildlife sites and will compromise the ability to achieve the Gog Magogs Strategic Green Infrastructure Scheme. The Council’s Assessment has underplayed impacts on natural environment and biodiversity in particular. They take issue with the assessment scores for GB1 re the scope for mitigation of impacts upon Netherhall Farm Meadow (County Wildlife site). To assume mitigation might be possible is arrogant. Reassessing GB1 could result in scores changing from amber to red in which case site should not be developed. They also question the Council’s score on impact on an SSSI. This should not be green as traffic levels on LimeKiln Hill are already damaging the SSSI. Any increase would pose a real threat. <p>Pollution</p> <ul style="list-style-type: none"> • Will create air, noise, and light pollution (9) • Addenbrookes incinerator requires open areas nearby (1) • This Green Belt Land is a valuable part of the City's heritage visually and also with wildlife sheltered from noise and light pollution. Any partial development would have a knock-on effect on the northern part of the GB1 site. (1) <p>Loss Agricultural Land</p> <ul style="list-style-type: none"> • Would destroy productive arable land (21) • Permission for conversion of barns on site to dwellings granted in 2012 subject to surrounding land remaining open and of agricultural appearance (1) <p>Traffic Issues</p>
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	<ul style="list-style-type: none"> • Transport infrastructure in this area cannot cope with additional development • Doesn't feel it is possible to assess these sites options without a set of traffic options (which could be met within budget limits) alongside an assessment of the impact on the local network (1) <p>Infrastructure</p> <ul style="list-style-type: none"> • Lack of local amenities and social infrastructure including schools and doctors surgeries; • flooding risk on lower land (1) <p>Alternative locations</p> <ul style="list-style-type: none"> • Consider Marshalls land instead (2) • Consider Waterbeach or Northstowe instead (7) • With all other sites in City and at Marshalls no need to further urbanisation. Need more balance (1) • Expand selected villages and new settlements instead (37) • In view of Northstowe going ahead the balance is against building on any Green Belt land around Cambridge (1) • Focus on other brownfield sites instead (11)
<p>Support GB1 (number of similar comments in brackets)</p>	<ul style="list-style-type: none"> • Fills a natural corner that lends itself to the purpose (1) • Provides a reasonable choice provided it doesn't spread nearer the Beechwoods (1) • Sites are suitable for residential development agree with arguments in favour (1) • Site appears to be well connected (1) • More homes are needed close to Addenbrookes (1) • Proximity to Park and Ride, Addenbrookes, and Guided Bus and Science Parks. (3) • Visually satisfactory (1) • Limited green belt development in established settlement may be appropriate (1) • Site accessible by public transport and bicycle and close to employment and services. Preferable to village locations where it adds to commuting/pollution/congestion/environmental impact (1) • Support on basis green belt setting is not compromised (2)

	<ul style="list-style-type: none"> • Development here would be beneficial (1) • Support as not as congested as area as Fulbourn Road (1) • Large developments should be kept close to Cambridge City (1) • Site could be extended to Junction of Worts Causeway and Lime Kiln Road (2) • Support as it would only extend existing built up areas (1) • Proximity to centres of employment, good public transport, schools and facilities thereby putting minimum strain on road congestion (1)
Comment	<ul style="list-style-type: none"> • Favour Worts Causeway sites because they wouldn't fundamentally change the nature of that part of the Cambridge boundary, visually or functionally (1) • Development here seems practical and has minimal impact (1) • English Heritage- The curved alignment of Beaumont Road will ensure that to some extent this allocation will give the appearance of 'rounding off' the city edge, though the eastern boundary might then have taken a more northeast-southwest alignment up to the track that forms the western boundary of the large field, whereas the current north-south alignment appears better suited to justifying the allocation of site GB2. We note the site includes locally listed farm buildings and while these might be retained, their setting is likely to be compromised by the allocation. It will therefore be necessary to consider whether or not there is sufficient wider public benefit to be derived from this allocation to justify the harm. The eastern boundary would need careful treatment to form an appropriate junction between the city and the Green Belt.

Site Number GB2: Land South of Worts' Causeway	
	KEY ISSUES ARISING FROM CONSULTATION
Objections GB2	Green Belt <ul style="list-style-type: none"> • Loss of Green belt /creates precedent (43) • Cumulative impact of loss this and other green belt land represents a 30% loss (1)

Site Number GB2: Land South of Worts' Causeway	
	KEY ISSUES ARISING FROM CONSULTATION
	<ul style="list-style-type: none"> • It will cause fundamental harm/impact upon the green belt (73) • Serious impact on Green Belt but less than GB1 since land is flat (1) • Unjustified breach of Green Belt policy (6) • There is a wrongful assertion that GB1 and 2 are of low environmental value. The NPPF doesn't discriminate in this way.(3) • NPPF Para 83 provides for Green Belt boundary changes only in "exceptional circumstances" The Council has not presented a compelling case as to why this constitutes exceptional circumstances (9) • Building in the green belt will harm the attractiveness of Cambridge and thereby hamper economic growth (4) • Contravenes stated purpose of Green Belt as defined in NPPF in failing to check unrestricted sprawl, safeguarding the countryside from urban encroachment, which would further contribute to the destruction of the special character of an historic town. (8) • Area was not allowed to be developed in 2002 LDA Green Belt Boundary Study (1) • Reasons for designating it Green Belt have not changed (5) • Object to green belt development but if absolutely required this site has minimal impact and good access to local services and employment. (1) • Scores for green belt significance questionable in 2012 document as they relate to two halves of same field (1) • Keep Green Belt for future generations to enjoy (1) • Green belt has prevented ribbon development (2) • This is arguably the best landscape in the City (1) • Will run risk of unrestricted sprawl extending/ encroaching upon open countryside beyond this site toward the Gogs (40) • Support the rejection of Site 911 Cambridge SE but same criteria apply to GB1 and GB2 (1) • Area forms important visual and physical buffer between urban edge and higher ground (67) • Soft green edge works and should not be compromised (33) • The development of these forelands will destroy the iconic status of area (1) • Represents an unspoilt gateway to open countryside even a small number of dwellings will change this ambience (2) • Land at base of Gogs is visually important and contributes

Site Number GB2: Land South of Worts' Causeway

KEY ISSUES ARISING FROM CONSULTATION

	<p>to setting of City when viewed from south (1)</p> <ul style="list-style-type: none"> • As you come over the hill the City appears and is largely unspoilt 1) • The Gogs are the only hilly feature in an otherwise singularly flat landscape (1) • Impact on views of Beech Woods (1) • Impact on views from Gogs (5) • Impact on views of Gogs (4) • New developments will be visible all way into Cambridge from south (1) • Development of Green Belt will lead to coalescence of villages which would lose their identify (4) • The integrity of necklace villages should be preserved at all costs and they should not be subsumed into the City. (1) • Green belt must remain for physical, emotional, mental and spiritual health as well as environmental reasons (2) • Sir William Wort gifted this land in perpetuity in 1709 so that Cambridge scholars of Emmanuel College could be coaxed into the countryside and enjoy the view (1) • Green Belt should be more valuable and protected as population of our small city densifies (1) • Impact of other housing on outskirts of Cambridge has yet to be evaluated (1) • Land off Long Road should never have been taken out of the Green Belt (1) • Green Belt should never be reviewed? (3) • The Council's 2012 Green Belt Review comments at para 3.4 "that where the city is viewed from higher ground or generally has open aspects...it cannot accommodate change easily" This is a clear instance of a view from higher ground. (2) <p>Natural Environment Biodiversity</p> <ul style="list-style-type: none"> • will have unacceptable adverse impact on the local ecological network including SSSI's, County and City Wildlife sites and will compromise the ability to achieve the Gog Magogs Strategic Green Infrastructure Scheme. The Council's Assessment has underplayed impacts on natural environment and biodiversity in particular. Reassessing GB2 could result in scores changing from amber to red in which case site should not be developed. They also question the Council's score on impact on an SSSI. This should not be green as traffic levels on LimeKiln Hill are already damaging the SSSI. Any increase would
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Site Number GB2: Land South of Worts' Causeway	
	<p>pose a real threat. Some of the scores against Green Belt on GB2 also underplay impacts and may be categorised red or amber. Cumulative scores may end up being changed amber to red. (66)</p> <p>Pollution</p> <ul style="list-style-type: none"> • Will create air, noise, and light pollution (9) <p>Loss Agricultural Land</p> <ul style="list-style-type: none"> • Would destroy productive arable land (18) <p>A number of attractive permissive footpath links are threatened by the proposed development along with impacts on biodiversity and the loss of safe attractive off road routes to Beech Woods and the Park & Ride.</p> <p>Traffic Issues</p> <ul style="list-style-type: none"> • Transport infrastructure in this area cannot cope with further development <p>Infrastructure</p> <ul style="list-style-type: none"> • Lack of local amenities and social infrastructure including schools and doctors surgeries; <p>Alternative Locations</p> <ul style="list-style-type: none"> • Consider Marshalls land instead (2) • Consider Waterbeach or Northstowe instead (10) • Expand selected villages and new settlements instead (33) • Focus on other brownfield sites instead (12) <p>Other Reasons</p> <ul style="list-style-type: none"> • There is a GHQ Line Anti tank trench running across the GB1 and GB2 sites which presents contaminated land issues and cultural heritage /archaeological issues and historic monument of national and regional importance requiring a risk evaluation under the Environmental Protection Act 1990 (1) • Area is important for passive recreation (50)
Support GB2 (number of similar comments in brackets)	<ul style="list-style-type: none"> • Fills a natural corner that lends itself to the purpose (1) • Provides a reasonable choice provided it doesn't spread nearer the Beechwoods (1) • Sites are suitable for residential development agree with

Site Number GB2: Land South of Worts' Causeway	
	KEY ISSUES ARISING FROM CONSULTATION
	<p>arguments in favour (1)</p> <ul style="list-style-type: none"> • Most sites look suitable for housing (1) • Proximity to Park and Ride, Addenbrookes, guided bus, Science Parks, and rail station to be built at Long Road (1) • Visually satisfactory (1) • Limited green belt development in established settlement may be appropriate (1) • Site accessible by public transport and bicycle and close to employment and services. Preferable to village locations where it adds to commuting/pollution/congestion/environmental impact (1) • Support on basis green belt setting is not compromised (2) • Development here would be beneficial but Cambridge still needs infrastructure to overcome congestion (1) • Support as not as congested as area as Fulbourn Road (1) • Support as it would only extend existing built up areas (1) • Proximity to centres of employment, good public transport, schools and facilities thereby putting minimum strain on road congestion (1) • Support if site includes significant green space to moderate impact of Addenbrookes from the Gogs (1) • Support but traffic along Babraham Rd needs to be addressed first (1) • Support development of site which is logical extension to Cambridge with minimal impact on green belt. It is a sustainable location. Site is available and can be developed independently or as part of larger phased scheme. It is unconstrained by infrastructure capacity and is unlikely to have contamination issues. Background evidence supports its development and is endorsed by the County Council. Offers potential for provision of affordable housing.
Comments GB2	<ul style="list-style-type: none"> • Favour Worts Causeway sites because they wouldn't fundamentally change the nature of that part of the Cambridge boundary, visually or functionally (1) • Development here seems practical and has minimal impact (1) • English Heritage- The curved alignment of Beaumont Road will ensure that to some extent this allocation will give the appearance of 'rounding off' the city edge, though the eastern boundary might then have taken a more northeast-southwest alignment up to the track that forms the western boundary of the large field, whereas the

Site Number GB2: Land South of Worts' Causeway	
	KEY ISSUES ARISING FROM CONSULTATION
	<p>current north-south alignment appears better suited to justifying the allocation of site GB2. We note the site includes locally listed farm buildings and while these might be retained, their setting is likely to be compromised by the allocation. It will therefore be necessary to consider whether or not there is sufficient wider public benefit to be derived from this allocation to justify the harm. The eastern boundary would need careful treatment to form an appropriate junction between the city and the Green Belt.</p> <ul style="list-style-type: none"> • English Heritage-Not logical to develop on its own but justified if developed in conjunction with GB1. Recommend GB1 is developed first . The eastern boundary would need careful treatment to form an appropriate junction between the City and the Green Belt.

Site Number: GB3: Fulbourn Road West (1)	
	KEY ISSUES ARISING FROM CONSULTATION
Objections GB3	<ul style="list-style-type: none"> • Loss of views of fields and piece and quiet • Negative visual impact on views of Lime Kiln Hill • It is an encroachment on the Green Belt • Proposal doesn't check unrestricted sprawl nor does it assist in safeguarding countryside from encroachment • Contributes to coalescence Cambridge and Fulbourn • Object as development should be located in new settlements and better served villages • Object to development in Green Belt but if absolutely required this site is near employment and has good access to City • NPPF Para 83 provides for Green Belt boundary changes only in "exceptional circumstances" The Council has not presented a compelling case as to why this constitutes exceptional circumstances (1) • Will encourage ribbon development along Fulbourn Rd (1) • Adverse impact on Green Belt due to its location on rising ground (37) • Adverse impact on Green Belt due to its location on rising ground. Proximity to and pressure upon Chalk Pits Nature reserve compromising its value as a

Site Number: GB3: Fulbourn Road West (1)	
	KEY ISSUES ARISING FROM CONSULTATION
	<p>nature reserve by increasing its isolation from wider countryside. The access to the development goes through existing housing areas and contributes to increased vehicular and pedestrian movements at the busy Robin Hood junction.</p> <ul style="list-style-type: none"> • will have unacceptable adverse impact on the local ecological network including SSSI's, County and City Wildlife sites and will compromise the ability to achieve the Gog Magogs Strategic Green Infrastructure Scheme. The Council's Assessment has underplayed impacts on natural environment and biodiversity in particular. Reassessing Site GB3 could result in the score changing from amber to red in which case they should not be developed • Site lies close to nationally and locally designated sites Cherry Hinton Chalk Pit SSSI, Limekiln Hill Local Nature Reserve. Natural England would only be satisfied with these sites being allocated if they result in no adverse effect on these sites through uncontrolled access, fly tipping, fires etc. • Concerns over transport implications of the proposal – area already heavily congested. • At bursting point on services and infrastructure (3) • Lack of school places (1) • Impact on health facilities (1) • Adds to flood risk on lower ground (2) • Loss of arable land (6)
Support GB3 (number of similar comments in brackets)	<ul style="list-style-type: none"> • This would do not change the beauty of the area (1) • Good choice as close to Cherry Hinton with its facilities and transport links although Chalk Pits and Nature Reserve must be protected (1) • Support provided shared use cycle path can be converted to proper cycle lanes on both sides of Fulbourn Road (1) • Support employment or housing but address traffic issues prior to development (1) • Beneficial development but Cambridge still needs infrastructure to overcome congestion (1) • Support provided setting not compromised (2) • General support of option (5) • Support as only extending built up area slightly (1) • Support as large developments should be kept close to Cambridge (2)

Site Number: GB3: Fulbourn Road West (1)	
	KEY ISSUES ARISING FROM CONSULTATION
	<ul style="list-style-type: none"> • Support this site as is accessible by public transport and bicycle. And is close to employment and services. This is preferable to village locations which add to commuting and congestion (2) • Support as there are good local employment, schools and shopping facilities (2) • Creates minimum strain on roads (1) • Minimal problems/ limited green belt development in established settlement may be appropriate (2) • Support as small developments and benefit housing (1) • Some of this land may provide opportunity for ARM to meet its growth requirements in the City, which could involve it doubling of its floorspace from 150,000sqft to 300,000sq ft over the next 10 years through a series of phased developments. Given its expansion requirement and its desire to remain in Cambridge it is therefore supportive of the allocation • Support development of this site as GB3 and GB4 are infill sites screened from the road by tall buildings on Peterhouse Technology Park and the rising ground to the south. Development should be recessed into the hillside to reduce visual impact further. Site GB3 should not be promoted for industrial development due to its proximity to residential development.
Comment	<p>Green Belt</p> <ul style="list-style-type: none"> • This site seems to cause low impact (2) • Best option is Fulbourn road site and NIAB site (1) • Fulbourn Rd with local employment preferable (1) • Most sites look suitable for housing (1) • Support Fulbourn Road (1) • Support for employment use as discrete and aligns with Peterhouse Technology Park. Proposers should offset balancing green belt provision elsewhere. • Would not materially effect the village of Fulbourn • Do not object to employment on this site as aligns with Peterhouse Technology Park and would be discrete. • English Heritage - These sites are relatively modest allocations where the boundary of the southern edge of the city would be aligned with the

Site Number: GB3: Fulbourn Road West (1)	
	KEY ISSUES ARISING FROM CONSULTATION
	Peterhouse Technology Park. English Heritage does not object and would wish to see careful treatment of the southern boundary to form an appropriate boundary with the green belt.

Site Number: GB4	
	KEY ISSUES ARISING FROM CONSULTATION
Objections	<p>Green Belt</p> <ul style="list-style-type: none"> • “Special circumstances” case for a green belt release has not been made (1) • Will lead to creep up the hill and is unwelcome (1) • Proposal doesn’t check unrestricted sprawl nor does it assist in safeguarding countryside from encroachment (1) • Contributes to coalescence Cambridge and Fulbourn (2) • Object as development should be located in new settlements and better served villages (1) • Green belt must remain for physical, emotional, mental and spiritual health as well as environmental reasons (2) • Visual impact misrepresented in document (2) • It will cause fundamental harm/impact upon the green belt (5) • Loss of Green belt /creates precedent (6) • If green belt is used it can never be replaced (2) • Object to development in Green Belt but if absolutely required this site is near employment and has good access to city/minimal impact (2) • Development will be an eyesore and should be recessed into the hill side to reduce visual impact further (1) • Will be visible from higher ground to the south (1) • Object to all green belt sites they should be left for future generations to enjoy (1) <p>Natural Environment Biodiversity</p> <ul style="list-style-type: none"> • Will ruin natural beauty of area (1) • Loss of wildlife habitats and biodiversity (1) • Puts pressure on Chalk Pits. Wildlife needs corridors to move between habitats should include a buffer

Site Number: GB4	
	KEY ISSUES ARISING FROM CONSULTATION
	<p>zone between reserves and this site (3)</p> <ul style="list-style-type: none"> • Adverse impact on Chalk Pits Nature Reserve SSSI (2) <p>Active and Passive Local Recreation/Leisure</p> <ul style="list-style-type: none"> • Have long campaigned for a safe off road footpath link from Fulbourn Road south to the Roman Road. Lime Kiln Hill is dangerous for walkers and lacks a footpath for most of its length. Improved rights of way could be provided as part of this development to provide safe access to the wider countryside. <p>Traffic Issues</p> <ul style="list-style-type: none"> • Transport infrastructure in the area cannot cope with additional development. <p>Infrastructure</p> <ul style="list-style-type: none"> • At bursting point on services and infrastructure (2) • Infrastructure (1) • Lack of school places (1) • Impact on health facilities (1) • Adds to flood risk on lower ground (2) <p>Loss Agricultural Land</p> <ul style="list-style-type: none"> • Loss of arable land (5)
Support (number of similar comments in brackets)	<ul style="list-style-type: none"> • Good choice as close to Cherry Hinton with its facilities and transport links although Chalk Pits and Nature Reserve must be protected (1) • Support provided shared use cycle path can be converted to proper cycle lanes on both sides of Fulbourn Road (1) • Beneficial development but Cambridge still needs infrastructure to overcome congestion (1) • Support provided setting not compromised (2) • General support of option (9) • Limited green belt development in established settlement may be appropriate (1) • Represents a natural extension of the Technology Park (1) • Support as only extending built up area slightly (1) • Support as large developments should be kept close to Cambridge (2)

Site Number: GB4	
	KEY ISSUES ARISING FROM CONSULTATION
	<ul style="list-style-type: none"> • Support this site as is accessible by public transport and bicycle. And is close to employment and services. This is preferable to village locations which add to commuting and congestion (1) • Support as there are good local employment, schools and shopping facilities (2) • Creates minimum strain on roads (1) • Minimal problems/ limited green belt development in established settlement may be appropriate (1) • Some of this land may provide opportunity for ARM to meet its growth requirements in the City, which could involve it doubling of its floorspace from 150,000sqft to 300,000sq ft over the next 10 years through a series of phased developments. Given its expansion requirement and its desire to remain in Cambridge it is therefore supportive of the allocation • Support development of this site as GB3 and GB4 are infill sites screened from the road by tall buildings on Peterhouse Technology Park and the rising ground to the south. Development should be recessed into the hillside to reduce visual impact further. • Support development of this site from an economic perspective as it forms a logical extension to the existing Peterhouse Technology Park and provide quality employment development for high tech uses • Supports the development as it represents a discrete extension to the mini science and technology park and will provide employment for local people, provide synergy with existing businesses, and contribute to business generally in the Cherry Hinton local centre
Comments	<p>Alternative Locations</p> <ul style="list-style-type: none"> • Most jobs opportunities in north of the City. Focus instead on Histon Girton Milton Waterbeach Cottenham (1) • A limited expansion may be acceptable if careful attention is given to height massing & materials (inc colour) the site can be seen from higher ground to the south. Any development must safeguard the amenity of adjoining housing to the north , be no

Site Number: GB4	
	KEY ISSUES ARISING FROM CONSULTATION
	<p>more than 2 storeys and incorporate a green roof to minimise visual impact from the higher ground and respond to environmental considerations (32).</p> <ul style="list-style-type: none"> Any development must safeguard the amenity of adjoining housing to the north , be no more than 2 storeys and incorporate a green roof to minimise visual impact from the higher ground and respond to environmental considerations (1)

Evidence base:

- Cambridge City Council (2002): Inner Green Belt Boundary Study 2002;
- LDA (2002): Cambridge Green Belt Study;
- The 2003 Cambridge Landscape Character Assessment;
- Cambridge City Council (May 2012): Inner Green Belt Appraisal; and
- Cambridge City Council (December 2012): Inner Green Belt Boundary Study;

Various Inspectors' Reports have also acknowledged the importance of the Cambridge Green Belt, including:

- PINS (2006). Cambridge Local Plan Inspector's Report 2006;
- PINS (2006). Report of the Examination into the South Cambridgeshire Core Strategy Development Plan Document;
- PINS (2007). Report of the Examination into the South Cambridgeshire Development Control Policies Development Plan Document;
- PINS (2011). Report on the Examination into the Cambridgeshire and Peterborough Minerals and Waste Site Specific Proposals Development Plan Documents.

How the policy came about:

286. Policy 26 sets out an overarching policy to guide the development of sites allocated for specific forms of development in the draft Cambridge Local Plan 2014, as shown on the Proposals Schedule and on the policies map. This policy seeks to set out a positive strategy for these sites, in response to the requirements of the National Planning Policy Framework for local plans meet objectively assessed needs for new homes and employment provision.

287. The allocation of sites for development in the draft Local Plan 2014 has been based on an extensive technical process, including:

- The identification of sites through the Strategic Housing Land Availability Assessment;

- Sites and issues raised through the Issues and Options 1 stage of the Plan preparation, July 2012;
- The detailed assessment of sites in the Issues and Options 2, Part 2 Site Options Within Cambridge – January 2013: Technical Background Document – Part 2;
- The Issues and Options 2 Parts 2 consultation on specific sites; and
- The responses to this consultation.

Further details on the key issues raised to sites, and the reasons for allocation sites within the draft Cambridge Local Plan 2014 can be found within the audit trail for individual sites (appendix 6 of the Statement of Consultation).

288. In addition to setting out general principles for the development of allocated sites, Policy 26 also sets out specific policy requirements for a number of small sites that are to be released from the Green Belt in order to contribute to meeting the housing and employment needs of the city, namely:

- Sites GB1 and GB2 (Land North and South of Worts' Causeway); and
- GB3 and GB4 (Fulbourn Road West 1 and 2).

289. The National Planning Policy Framework provides for Green Belts to be established and revised through local plans, to provide a long term framework having regard to the need to promote sustainable development. The current Green Belt was last altered following the 2002 Structure Plan and was intended to last until 2016. However circumstances change and major development at Cambridge East will no longer be deliverable for the foreseeable future. Good progress is being made with the current strategy with the exception of Cambridge East but insufficient land has been found within the urban area of Cambridge to fully meet identified objectively assessed needs. The Council's are currently reviewing their Local Plans to 2031 and have to have regard to future settlement policy and future Green Belt. The Cambridgeshire Local Planning Authorities have taken and will continue to take a sequential sustainable approach to the location of growth using City brownfield land first before considering land on the edge of Cambridge (including land in the Green Belt), in new settlements beyond the outer Green Belt boundary and then in the most sustainable villages.

290. A joint review of the inner Green Belt boundary has established that there is no scope for major Green Belt releases without there being very significant detriment to the purposes of the Cambridge Green Belt. The review did identify several small sites which could be released from the Green Belt on the edge of Cambridge where the detriment would not be significant to Green Belt purposes. The exceptional circumstances arising from the need to meet the residue of objectively assessed need for homes within Cambridge city's administrative boundary means that these small sites are needed. The small employment sites at Fulbourn Road will help contribute to the continued success of the Cambridge cluster. The Local Plan has to consider objectively assessed needs and how these might be met over the plan period in a

sustainable way. On balance the level of harm to Green Belt purposes in losing these small sites is judged to be acceptable when weighed against the broader needs of the City to 2031. This finding together with the guidance in the National Planning Policy Framework concerning sustainability and the need to establish a durable Green Belt boundary provides justification for the release of land from the Green Belt for development.

291. A concern raised during consultation on the Issues and Options (2012) and Issues and Options 2 reports was that further release of land from the Green Belt would lead to the coalescence of Cambridge with nearby villages. The new Green Belt boundary proposed on the edge of sites GB1 and GB2 (land north and south of Worts' Causeway) and land south of Fulbourn Road (sites GB3 and GB4) will serve to prevent further built development from encroaching on the surrounding necklace villages, key landscape, and historic features beyond the edge. Given the distance between these sites and nearby villages, it is considered that there is no risk of coalescence. One of the purposes of Green Belt is to prevent this happening, and the council considers that once a new boundary is confirmed this will provide a more defensible Green Belt boundary, serving to prevent any further encroachment occurring.
292. The 2012 Green Belt Appraisal fully recognised the qualities of the landscape to the south on the higher ground, which, as residents say is among the best to be found in the Cambridge area. The new Cambridge Green Belt boundary suggested is intended to be long term and endure beyond the plan period of 2031. At Worts' Causeway planting and landscaping of its eastern boundary will form a stronger and distinctive new edge to the city and will serve to enhance the setting maintain the openness of the surrounding landscape and protect historic features. Its Green Belt status will prevent development creeping any closer to the outstanding city setting provided by the Gog Magogs and open countryside. The council acknowledges the unique quality this area has and the physical and psychological benefits of having such high quality open land near where city residents live. It does not however consider this will be harmed by a discrete development some distance away at the bottom of the slope. Indeed the development of this land could serve to enhance the enjoyment of the surrounding countryside by taking steps to reduce traffic in the area, maintain the country lane feel of Worts' Causeway and opening up permissive paths and green infrastructure improvements to help improve such access and enjoyment. Proposals for the development of these sites will be required to include biodiversity enhancement, the creation of green/wildlife corridors and the protection of local conservation importance, notably the Netherhall Farm Meadow County Wildlife Site.
293. At the land south of Fulbourn Road, the proposed Green Belt release does not cause significant harm to Green Belt purposes. The site is to be allocated for employment uses, and development could be cut into the hill side in the same way as the Peterhouse Technology Park in order to minimise its visual impact when seen from higher ground to the south of the site. Appropriate planting

and landscaping would be undertaken on the southern boundary of the site to form a stronger and distinctive urban edge. A wildlife corridor could also be established as part of the development to retain any routes between the adjacent nature reserves and Site of Special Scientific Interest and the wider countryside for wildlife. Improved rights of way could be negotiated as part of the development of this site to provide safer access to the open countryside. Elsewhere in the plan, important linkages from the Green Belt on this side of the city as part of a green and blue infrastructure corridor are being promoted from Limekiln Hill and East Pit through the Giants Grace, Cherry Hinton Hall, Land South of Coldham's Lane across to Coldham's Common.

294. Given the nature of these sites, and in response to representations received to these sites during the Issues and Options 2 consultation, it is considered appropriate to set out some specific policy requirements to ensure that these developments on the edge of the Cambridge take a sensitive approach to their setting, providing a long-term defensible edge to the Cambridge Green Belt.

Findings of the Sustainability Appraisal of the Cambridge Local Plan (July 2013)

295. Policy 32 sets out the general policy regarding flood risk requiring development to be in line with the sequential test⁴, and that proposals should reduce surface water runoff rates so that they are no greater than what would have been the case for a greenfield or undeveloped site. Policy 26 requires proposed developments to make provision for any amelioration and mitigation needed to address issues of flooding. Policy 32 also highlights the fact that new development has the potential to reduce flood risk elsewhere in the city. Preventing impermeable driveways (Policy 66) and protecting gardens from development (Policy 53) will also reduce runoff rates and increase infiltration, preventing increased flood risk.
296. Policy 31 sets out the policy towards handling water and highlights the need for SuDS to reduce flood risk with developments required to integrate the principles of water sensitive urban design. When SuDS are combined with high quality landscaping they can deliver multi-functional green and blue infrastructure which can deliver a range of benefits. Policy 26 requires the integration of proposed and existing sustainable drainage measures on site. Policy 59 (criterion h) requires landscaping to incorporate trees, surface water management and microclimate into landscape and public realm schemes and also for planting to be climate resilient, which should contribute towards mitigating the urban heat island effect through providing vegetation which cools the environment through transpiration and providing shade. This effect should be added to by Policy 31 which allows green roofs and Policy 71 which protects mature trees.

⁴ The sequential test is set out in the NPPF and directs development to areas that have the lowest risk of flooding.

297. Policies 13 and 85 require infrastructure to support development, including open space, recreation, green infrastructure, drains and flood defences. Policy 26 requires the integration of proposed and existing sustainable drainage measures on site. Taken together these requirements should ensure the delivery of critical infrastructure which should help Cambridge to manage flood risk and adapt to the risks of climate change.
298. Policy 26 sets out the criteria which the 'Site Specific Development Opportunities' will be subject to, which includes design considerations and following other policy requirements in the plan. Specific sites in the green belt (sites GB1 to GB4) are required to incorporate sensitive design including landscaping, buffers, and particularly at sites GB1 and 2 the retention of the country lane appearance and character of Worts' Causeway including its verges, hedgerows and bridleway. Any archaeological remains should also remain preserved in situ. Such requirements should ensure that any potential landscape or archaeological heritage impacts are mitigated.
299. Policy 26 (Site Specific Development Opportunities) requires new development at these sites to have 'satisfactory access and other infrastructure provision'. Specific sites GB1 and GB2 in the Green Belt are subject to additional requirements including the retention of Wort's Causeway as a bus-only route during peak periods; a green link to the Green Belt for pedestrians, horse riders and cyclists; and the provision of a single access and crossover onto Babraham Road – all of which should help reduce car use and promote sustainable transport.
300. Policy 26 requires biodiversity enhancement, creation of ecological corridors, the retention of hedgerows and, specifically at site GB1 (land north of Wort's Causeway), the policy requires buffer areas at Netherhall Farm Meadow County Wildlife Site to protect and enhance the meadow, and the retention of safe relocation of bat roosts.
301. Policy 26 details a list of site specific development opportunities considered suitable for residential, residential moorings, employment, university use or mixed use which should lead to positive effects on community and wellbeing through providing housing, leisure, retail and employment opportunities.
302. Policy 13 sets out the general principles for development at the Areas of Major Change and Opportunity Areas, of which two (Policies 14 and 21) fall within the North Cambridge Functional Area. Additionally, a number of Site Specific Development Opportunities are located in the area under Policy 26. Taken together these policies provide for a significant amount of development in the area, with which it will be important to deliver contributions towards meeting the sustainability objectives for the area.
303. Policy 3 sets out the spatial strategy regarding residential development whilst Policy 2 sets out the spatial strategy for employment development. Policy 13

sets out the general principles for development at the Areas of Major Change, of which three (Policies 15, 16 and 17) fall within the South Cambridge Functional Area. Additionally, a number of Site Specific Development Opportunities are located in the area under Policy 26. Taken together these policies provide for a significant amount of development in the area, with which it will be important to deliver successful new communities.

304. Policy 26 makes provision for 9.97ha of additional employment land above the previous Local Plan allocations. These new employment opportunities should benefit the more deprived areas in the east of the Functional Area and lead to significant positive effects.

305. Policy 26 allocates four sites for Green Belt land release and details a list of criteria which would need to be met in order for development to occur. These criteria relate to landscaping and preserving the existing character of the Green Belt. Other sites on the urban fringe are allocated under Policies 16 and 17.

Key Issues raised during Proposed Submission consultation

Policy 26: Site Specific Development Opportunities	
Total Representations: 101 (including a petition signed by 2,025 people)	
Object: 94 (including a petition signed by 2,025 people)	Support: 7
Objections	<ul style="list-style-type: none"> • Petition signed by 2,025 people and other respondents opposing the further destruction of the Cambridge Green Belt on the basis of: <ul style="list-style-type: none"> ○ lack of exceptional circumstances to justify release of Green Belt land; ○ urban sprawl impacting on the historic and compact character of the city, its surrounding villages and countryside and impact on traffic congestion; ○ plans being based on out-of-date growth forecasts and first consideration should be given to greater re-use of existing brownfield sites not in the Green Belt. • The concept of Green Belt will be redundant if this land is released; • Impact on local biodiversity and habitat; • The Wildlife Trust object as the Green Belt sites compromise a recognised strategic green infrastructure scheme (the Gog Magogs Countryside Area) without significant ecological enhancement of the area and the creation of the strategic green infrastructure; • Impact on local transport routes including pedestrian access to the Gogs and Beechwoods and walking, running and cycling areas; • Impact on one of Cambridge’s 'green lungs';

	<ul style="list-style-type: none"> • Poor air quality, fumes and noise from vehicles; • Unsatisfactory access for sites; • Development should include safe provision for cyclists and pedestrians, separate from cars; • Loss of Green Belt is not exceptional circumstance for affordable housing. No exceptional circumstances given to justify the use of Green Belt land; • Development should be focussed with the city on brownfield sites or beyond the Green Belt in South Cambridgeshire; • Close to the Park and Ride site risking future infill development; • Development will alter the character of the local area and affect the setting, views and history of the area, especially impacting on the Beechwoods, Wandlebury, Gog Magogs Hills and Roman Road; • Ainsdale would be ruined by this development; • Substantial development would spoil recreational use and the quality of transition from countryside to city; • Retain Green Belt land for agriculture; • GB1 Land north of Worts' Causeway and GB2 Land south of Worts' Causeway have tremendous value as a southern approach and entrance to the city; • Doubt projected need and calculations not fully explained – must be proportionate, adequate, up-to-date and relevant; • Development will increase risk for flooding; • Much wider privacy landscaping required along the western edge of GB2 Land south of Worts' Causeway needed; • Development will increase congestion on already congested roads, particularly at peak times, leading to road hazards and restricted access for ambulances. Addenbrooke's expansion and the Bell School development will exacerbate it; • Development will lead to urban sprawl and contradicts policy to retain compact city; • Disturbs bat colony and inevitably adversely affects meadows and wildlife; • Satisfactory buffering between new and existing development, if development is permitted; • Policy will start the process of coalescence with neighbouring villages; • Involves development in area already lacking community facilities; • Ecological assessment of Green Belt land is unsound and biased; • The correct assessment should have been orange or red, there is a thriving ecosystem that needs protection and will be sacrificed by any development; • Council at odds with its policy 'protecting, enhancing and maintaining the unique qualities and character of Cambridge,
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	<p>including...the city's wider landscape and setting';</p> <ul style="list-style-type: none"> • Allocations contradict Green Belt policy; • Ecological corridors don't work, they are a compromise that avoids the real problem; • The cost for significant upgrades of infrastructure for gas, water, and electricity supplies may fall on the taxpayer rather than developer; • Sites GB1 Land north of Worts' Causeway and GB2 Land south of Worts' Causeway should be masterplanned to deliver a single approach to education; • Object because wider area has not been allocated as well; • A Household Recycling Centre needed to serve the southern area of Cambridge; • Development should ensure/retain the same level of priority to bus movements; • Show Gog Magogs green infrastructure scheme on the Policies Map; • The SSSI status should make this the most protected site for nature conservation in the city; • Housing on this land can be affordable due to high value of the land; • Policy does not work for horse riders as it is too negative; • The developments would contravene the council's own 800 metre walking distance measurements to amenities for sustainability; • There is a considerable rise in the land and given the proposed density will necessitate buildings of at least 3 storey which will not be an appropriate scale in relation to adjoining sites; • The Green Belt assessment referred to in Paragraph 3.111 is questionable as there appears to be very little foundation for the highly subjective opinions promoted by the assessment; • GB1 Land north of Worts' Causeway is unsuitable because of the admitted drainage problems; • Use land other than Green Belt such as Waterbeach airfield, Cambourne, The Paddocks, land fronting onto Queen Edith's Way (now playing fields for Queen Emma School), redundant Barrington Cement Works with rail access, relocation of Cambridge Airport as a priority; • There are brownfield sites within the urban area of Cambridge which have not been given sufficient consideration by the Council. The sites include Newmarket Road Retail Parks and the Beehive Centre; the warehouses at Church End, Cherry Hinton; the railway sidings west of Rustat Road; Owlstone Croft, Newnham; and Bishops Court, Trumpington; • Delete land north of Worts' Causeway and replace with allocation of land west of Hauxton Road, Trumpington and at
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	<p>the Abbey Stadium, Newmarket Road for the delivery of a community football stadium, indoor and outdoor sports facilities and enabling residential development;</p> <ul style="list-style-type: none"> • Object because does not identify the Triangle site currently occupied by Cambridge University Press as an allocated site for the provision of new employment development; • Allocate land at the corner of Milton Road and Gilbert Road as a mixed use allocation with permissible uses being an aparthotel, residential use and community uses.
Support	<ul style="list-style-type: none"> • General support for the policy and associated allocations; • Whilst supporting the Green Belt sites, the area could be expanded to around 1,500 homes with priority for affordable homes, top class transport and additional facilities to serve the needs of existing and new neighbourhoods; • Support new homes and employment opportunities on these Green Belt sites; • Support development, however any impact on wildlife must be offset and an independent ecological survey carried out; • Policy supports sustainable development; • Broad support for release of GB1 Land north of Worts' Causeway and GB2 Land south of Worts' Causeway, but should accommodate lower density, low rise family housing with potentially higher density on GB2 Land south of Worts' Causeway ; • ARM supports the release of GB3 and GB4 Fulbourn Road, west 1 and 2 for employment development and to facilitate its plans for expansion; • Support these four Green Belt allocations, but council should review the adjoining areas for further development because larger allocations would deliver sustainable development, and the benefits accruing will increase; • Support allocation of GB2 Land south of Worts' Causeway which is sustainable, available and deliverable (on edge of city, close to residential properties and facilities, with good transport links), but identify inconsistencies in wording of policy about contributions for community facilities between Policy 26 and Appendix B; • Supports allocation, but wants it to include student accommodation.

Minor Modifications suggested following Proposed Submission consultation and implications for Sustainability Appraisal

306. As a result of assessment, a minor modification is suggested for Policy 26, criterion (h). This change is in the Addendum to the Cambridge Local Plan 2014: Proposed Submission document marked as PM/3/0276. This change is suggested in response to a representation (Representation Number 27723) and to ensure that sufficient provision is made for bridleways. This change reads:

“h. the establishment of appropriate public footpaths/bridleways linking the development with the surrounding chalk farmland;”

307. Following consideration of the impact of this change on the Sustainability Appraisal Framework, it has been concluded that this change does not materially alter the findings of the Sustainability Appraisal.

AUDIT TRAIL: SECTION 4: CLIMATE CHANGE AND MANAGING RESOURCES

Policy 27: Carbon Reduction, Community Energy Networks, Sustainable Design and Construction and Water Use

EXISTING POLICY TO BE REPLACED (CAMBRIDGE LOCAL PLAN 2006)	OPTION(S) BEING TAKEN FORWARD FROM THE ISSUES AND OPTIONS REPORT (2012) AND ISSUES AND OPTIONS 2 (2013)	OPTION(S) NOT BEING TAKEN FORWARD FROM THE ISSUES AND OPTIONS REPORT (2012)
<ul style="list-style-type: none"> • 3/1 Sustainable Development; and • 8/16 Renewable energy in major new developments 	<ul style="list-style-type: none"> • Option 42 development of a comprehensive sustainable development policy; • Option 43 setting of sustainable construction standards; • Option 44 targets for on-site carbon reduction; • Option 48 renewable and low carbon energy generation; • Option 49 climate change adaptation; • Option 53 water efficiency in new residential development; and • Option 55 water efficiency in new non-residential development 	<ul style="list-style-type: none"> • Option 45 Detailed targets for on-site carbon emission reductions in line with the findings of the Decarbonising Cambridge Study; • Option 46 Leave carbon reduction to Building Regulations and continue to operate a percentage renewable energy policy; • Option 52 Water efficiency – water neutrality; • Option 54 water efficiency – 105 litres per head per day; • Option 56 water efficiency – non-domestic buildings – BREEAM.

Key issues raised during Issues and Options (2012) and Issues and Options 2 (2013) consultations:

SECTION OF ISSUES AND OPTIONS REPORT (2012)	KEY ISSUES ARISING FROM CONSULTATION
Option 42: Comprehensive sustainable development policy	<ul style="list-style-type: none"> • Strong support for development of this policy; • Learn from the best examples in Europe where this approach is much further advanced; • Policy needs to cover existing communities,

SECTION OF ISSUES AND OPTIONS REPORT (2012)	KEY ISSUES ARISING FROM CONSULTATION
	<p>infrastructure and buildings as well as new development;</p> <ul style="list-style-type: none"> • A clear policy integral to the Local Plan will help assist with the design of development proposals; • Should place emphasis on smarter use of land, especially public realm; • Should include conservation and enhancement of the historic environment; • Promote local food production; • Need to consider behavioural change; • There is a need for a definition of sustainable development, which should then be fed through to all other policies.
Option 43: Sustainable Construction Standards	<ul style="list-style-type: none"> • Support for the policy – Cambridge should lead by example; • Standards should rise over time and higher standards should be sought from large scale development; • Concern surrounding how such an approach can be achieved where development incorporates historic buildings and redevelopment of existing buildings; • Need to give consideration to impact on viability and alignment with Building Regulations and zero carbon policy; • Consider alternatives to the Code and BREEAM.
Option 44: Detailed targets for on-site carbon reduction related to the levels of the Code for Sustainable Homes being sought	<ul style="list-style-type: none"> • General support for this approach; • Some feeling that this would not be ambitious enough.
Option 45: Detailed targets for on-site carbon reduction in line with the findings of the Decarbonising Cambridge report.	<ul style="list-style-type: none"> • Support for stronger level of policy intervention – Cambridge should lead by example; • Preferred on the grounds of long-term sustainability; • Support for approach for non-residential development being linked to Building Regulations.
Option 46: Leave carbon reduction to Building Regulations and continue to operate a percentage renewable energy	<ul style="list-style-type: none"> • General support for this approach; • Concerns over the impact of this approach on the viability of development; • On-site renewables are not always the most efficient option – policy should allow for off-site renewables to be taken into account;

SECTION OF ISSUES AND OPTIONS REPORT (2012)	KEY ISSUES ARISING FROM CONSULTATION
policy	<ul style="list-style-type: none"> • Policy should focus on carbon reduction and not on-site renewables.
Option 49: Climate change adaptation	<ul style="list-style-type: none"> • Strong level of support for policy development; • Urban greening very important; • Need to consider long-term maintenance requirements for some adaptation measures (e.g. SuDs); • Further detail regarding setting tree canopy requirements needed; • Should be applied to existing communities as well as new development.
Option 52: Water efficiency – water neutrality	<ul style="list-style-type: none"> • Clear need for a policy dealing with water conservation; • General support but with questions as to whether this policy would be achievable; • Need to consider approach to engaging the existing community in water reduction; • Concern from developers over impact on viability of new development; • Support Option 53 up to 2022 moving up to Option 52 after 2022.
Option 53: Water efficiency – 80 litres/head/day	<ul style="list-style-type: none"> • Clear need for a policy dealing with water conservation; • Concern from some that this approach would not go far enough in dealing with issues of water shortage and its wider impact; • Support from those who see this as a more realistic option than option 52; • Need to consider approach to engaging the existing community in water reduction; • Concern from developers over impact on viability of new development; • Support Option 53 up to 2022 moving up to Option 52 after 2022.
Option 54: Water efficiency – 105 litres/head/day	<ul style="list-style-type: none"> • Clear need for a policy dealing with water conservation; • Concern that this approach would not go far enough in dealing with issues of water shortage and its wider impacts; • Need to consider approach to engaging the existing community in water reduction; • Support from developers as less focussed on seeking enhanced measures.
Option 55: Water efficiency – non-domestic buildings – full credits for water	<ul style="list-style-type: none"> • Support from those who feel that the highest possible standards should apply across all new development regardless of use; • Concern from developers around the impact on the

SECTION OF ISSUES AND OPTIONS REPORT (2012)	KEY ISSUES ARISING FROM CONSULTATION
efficiency	viability of new non-residential development as well as refurbishment of existing buildings.
Option 56: Water efficiency – non domestic buildings – BREEAM	<ul style="list-style-type: none"> • Support from developers as this represents a lower cost option and is less likely to impact on viability; • Other stakeholders object to this approach on the grounds that it would not go far enough in dealing with issues of water shortage and its wider impacts.
NEW OPTIONS ARISING FOLLOWING COMMUNITY INVOLVEMENT:	
<p>COMPRESIVE SUSTAINABLE DEVELOPMENT POLICY:</p> <ul style="list-style-type: none"> • Green spaces could also be included as part of this policy as this would ensure a more integrated approach than a standalone policy; • Policy needs to reflect economic and social considerations if it is to be properly considered as a comprehensive sustainable development policy; • Provide support for communal meeting places to strengthen local communities; • Should include policies to encourage and support mixed-use development; • The plan should include a short waste section, recognising that growth and development will impact on waste arisings and may lead to a need for further infrastructure; • It would be worth considering Hackney’s proposals for a Wood First Policy. <p>SUSTAINABLE CONSTRUCTION STANDARDS:</p> <ul style="list-style-type: none"> • Develop a policy requiring a minimum level of the Code for Sustainable Homes (at least level 4 rising over the period), and BREEAM (very good rising to excellent); • Set out a requirement for appropriate assessment of sustainable construction in the comprehensive sustainable development policy, with guidance on methodologies set out in an SPD. <p>CARBON REDUCTION TARGETS:</p> <ul style="list-style-type: none"> • Policy could include a sliding scale whereby standards are higher for larger developments, with lower minimum standards for single dwellings and midway for small developments. • Policy should recognise that on-site renewables are not always the most efficient option and should allow for off-site renewables to be taken into account if on-site solutions are not appropriate or viable. <p>WATER EFFICIENCY TARGETS:</p> <ul style="list-style-type: none"> • There was a suggestion that a further option could be to support Option 53 (80 litres/head/day) up to 2022 moving up to Option 52 (water neutrality) after 2022. 	

Evidence base:

- Element Energy for Cambridge City Council. (2010). Decarbonising Cambridge Study;
- Cambridge City Council (2007). Sustainable Design and Construction SPD;

- Climate Works for South Cambridgeshire District Council (2012). Merton Rule Study;
- Zero Carbon Hub (2009). Defining a fabric energy efficiency standard for zero carbon homes. Task Group Recommendations;
- Zero Carbon Hub (2011). Carbon compliance: Setting an appropriate limit for zero carbon new homes. Findings and Recommendations;
- UK Climate Projections (UKCPO9);
- DEFRA (2012). UK Climate Change Risk Assessment;
- Cambridge City Council Climate Change Risk Assessment and Management Plan (2009);
- Cambridge City Council (2012). Climate Change Strategy and Action Plan;
- Cambridgeshire Green Infrastructure Strategy (2011);
- Cambridge Water Company Water Resources Management Plan (2010);
- Cambridge Water Cycle Strategy Phase 1 (2008) and Phase 2 (2011);
- Cambridge Water Draft Water Resources Management Plan (2013);
- BRE (Cross Sector Group on Sustainable Design and Construction) (2012). Good Practice Guidance: Sustainable Design and Construction;

How the Policy Came About:

1. Policy 27 represents a combination of a number of policy options that were consulted on at the Issues and Options stage, notably:
 - Option 42 – development of a comprehensive sustainable development policy;
 - Option 43 – setting of sustainable construction standards for new development (Code for Sustainable Homes and BREEAM);
 - Option 44 – targets for on-site carbon reduction;
 - Option 48 – Renewable and low carbon energy generation (notably references to connection to district heating);
 - Option 49 – climate change adaptation;
 - Option 53 – water efficiency in new residential development;
 - Option 55 – water efficiency in new non-residential development.

The combination of these options into one policy should give certainty to developers as to the policy requirements related to sustainable design and construction.
2. The National Planning Policy Framework states that “the purpose of the planning system is to contribute to sustainable development”. This is key to tackling the linked challenges of climate change, resource use, economic prosperity and social well-being and cannot be achieved without sustainable buildings and communities. The principles of sustainable design and construction, which this policy seeks to embed within development proposals, focus on the implementation of sustainable development at the scale of individual sites and buildings. This approach would build upon the current approach taken in the Cambridge Local Plan 2006, which calls for the

submission of a sustainable development checklist and Sustainability Statement. Where this new policy differs is that the Sustainability Statement would form part of the Design and Access Statement. Not only would such an approach assist developers in demonstrating how their proposals meet the 'presumption in favour of sustainable development', the integration within the Design and Access Statement will also ensure that the principles of sustainable design and construction are implemented from the outset of the design process.

3. As recognised by the Interim Sustainability Appraisal, such a policy should contribute positively across all sustainability topics, helping to maintain Cambridge's position as a competitive city and a leader in sustainability. The Decarbonising Cambridge Study recognised that much can be done to improve sustainability, and indeed reduce demand for energy and other resources, through good design and intelligent materials selection. This is best achieved, both in terms of cost and ease of integration, at the design stage, which represents a unique opportunity to influence how a building, and indeed a development as a whole, will perform throughout its lifetime. Good design principles and sustainable construction practices should, therefore, be encouraged from the earliest stage in new development projects.
4. The inclusion of these measures within the Design and Access Statement is in keeping with the Department of Communities and Local Government's "Guidance on Information Requirements and Validation" (2010), which at paragraph 105 states:
"Climate change considerations are integral to the planning system, including the design of new developments...Design and access statements for outline and detailed planning applications should therefore demonstrate how climate change mitigation and adaptation measures have been considered in the design of the proposals. These measures may be of particular relevance under the topic headings of amount, layout, scale, landscaping, context or access, depending on the nature of the proposed development and its anticipated impacts on the surrounding areas". By asking for this information to be submitted with the Design and Access Statement for major developments, the policy also takes account of the Growth and Infrastructure Bill, which states that information requirements for planning applications should be reasonable having regard to the nature and scale of the proposed development.
5. While the focus of policy 27 is on physical measures that can be implemented through development, this option should also have positive benefits for the social and environmental aspects of sustainable development. For example, by ensuring that all new development has access to open space, this will enable new, and existing residents to engage in recreation, which will help improve health and well-being. It is the council's intention that sustainability/sustainable development will be a common theme running throughout the new local plan, and it will be important that this policy is considered in light of other policy options. These include the Council's revised

open space standards, which will include requirements in relation to allotment and wider open space provision, requirements for community facilities, and the council's revised car and cycle parking requirements. This policy will also link to the proposed policy on Climate Change and the Historic Environment, which seeks to provide a balanced approach between protecting the heritage assets of Cambridge while ensuring that they contribute to tackling climate change and reducing carbon emissions. The conservation and enhancement of the city's historic environment is an integral element of sustainable development.

6. Some of the elements included within this policy are those that the council is required by law to include in its local plans. For example, the Planning Act (2008) places a legal duty on all local planning authorities to include climate change adaptation policies in their plans. Other elements are supported by the National Planning Policy Framework, which, at paragraph 94, places a duty on local planning authorities to adopt "proactive strategies to mitigate and adapt to climate change, taking full account of flood risk, coastal change and water supply and demand considerations". Paragraph 95 goes on to support the setting of local requirements for a building's sustainability, as long as this is done in a way that is consistent with the Government's Zero Carbon agenda and adopts nationally described standards.
7. On the issue of setting standards for a building's sustainability, planning has an important role in encouraging and facilitating the development of buildings that meet high standards of sustainability as part of its objective to contribute to the achievement of sustainable development. For new homes, this means building to the requirements set out in the Code for Sustainable Homes, while for non-residential buildings the BREEAM standard should be used. Both of these standards consider a range of categories that form a measure of a building's sustainability including energy and water, as well as issues such as biodiversity enhancement and health and well-being of building occupants. While national standards should be used in policy, this does not rule out the use of other construction standards. Respondents to the Issues and Options Report showed support for the Passivhaus standard of construction, which can form part of the strategy for achieving a required Code for Sustainable Homes or BREEAM rating. Some flexibility has been included within the supporting text of the policy so that if a development were to come forward using a different construction standard, for example LEED (Leadership in Energy and Environmental Design), this would be supported provided that it can be demonstrated that it is broadly in line with the standards set out in the policy. The policy also includes support for the development of bespoke construction/environmental performance standards for the redevelopment of existing buildings, which are not covered by the Code for Sustainable Homes or BREEAM.
8. The standards included in Policy 27 are based on evidence contained within the Decarbonising Cambridge Study, which considered the viability of setting sustainable construction standards through policy. With regards to BREEAM,

the study suggested that BREEAM 'very good' be the minimum standard required by policy. Policy 27 suggests a stepped approach whereby BREEAM 'very good' is required up to 2016, with this rising to BREEAM 'excellent' from 2016 in light of the uplift in energy requirements required through Building Regulations and the progression towards Zero Carbon non-domestic buildings in 2019. It should be noted that the policy does not seek to merely duplicate Buildings Regulations, as the BREEAM standard covers a significantly wider range of issues than is covered by Building Regulations alone. This approach was supported by many respondents to the Issues and Options Report and is supported by the National Planning Policy Framework.

9. In terms of the Code for Sustainable Homes, the Decarbonising Cambridge Study, provided a technical and economic assessment of achieving a range of Code for Sustainable Homes levels, from Level 3 through to Level 6, which represents the highest possible standard of construction. The study concluded that Code Level 4 would be a viable standard to target through policy for all scales of development, with extra over costs ranging from 1% to 4.5%, with these costs reducing further with subsequent amendments to Building Regulations as part of the introduction of national Zero Carbon policy. A policy requirement for higher levels of the Code on small and medium scale development was considered to be difficult to achieve, partly due to the increase in costs and in part due to the technical restrictions on the use of biomass in Cambridge due to the presence of an Air Quality Management Area, which represents one of the most cost effective ways in which to achieve Levels 5 and 6 of the Code. However the policy will be expressed as a minimum so as not to discount higher standards coming forward where possible. It may also prove necessary to periodically review the policy so that should the energy requirements of Code Levels 5 and 6 be amended to be in line with national Zero Carbon policy, the policy can be updated to reflect that these higher standards may be achievable post 2016.
10. There was some concern expressed during the Issues and Options consultation as to the consistency of the policy with national Zero Carbon policy and changes to Building Regulations. The proposed changes to Building Regulations in 2010 and 2013 were always intended to provide a step change in sustainable construction, leading house building towards to introduction of Zero Carbon policy in 2016. While it is noted that a lower level of carbon reduction than originally intended is to be introduced in the 2013 Building Regulations, this policy is still consistent with the introduction of Zero Carbon policy in that it provides a step towards Zero Carbon development in 2016. This standard is already being achieved across many development sites in Cambridge, with evidence from developers suggesting that it is a key factor influencing people's decision to buy a new home in Cambridge. It should also be noted that standards such as the Code for Sustainable Homes, covers a significantly wider range of issues than is covered by regulation and the Government's Zero Carbon policy. As such, its application to new development is considered in conformity with the National Planning Policy Framework, is supported by

Cambridge specific evidence and is in keeping with the Vision of the Local Plan for development to help support Cambridge’s transition to a more environmentally sustainable and successful low carbon economy.

11. The National Planning Policy Framework also recognises the key role that planning has to play in securing radical reductions in greenhouse gas emissions. The Climate Change Act 2008 contains a statutory target of securing a reduction in carbon dioxide levels of 80% below 1990 levels by 2050, with an interim target of 34% reduction by 2020. The achievement of national targets for the reduction of carbon emissions will require action across all sectors of energy use. Within Cambridge, this will involve balancing the overall increase in emissions associated with new development with the opportunities that these new developments offer for reducing carbon and greenhouse gas emissions, through measures such as improving energy efficiency and the provision of on-site renewable and low carbon energy generation.

12. In arriving at the levels of on-site carbon reduction contained within Policy 27, a number of alternative policy options have been considered, as illustrated in table 1 below. In terms of the approach to non-residential development the timetable for Zero Carbon non-residential buildings (2019) would be followed, assuming that this continues as planned. Given that the pathway for Zero Carbon non-residential buildings is less well defined than that for housing, it is considered that following the levels of carbon reduction planned through future amendments to Part L of the Building Regulations would be the most appropriate approach, which was supported by a number of respondents to the Issues and Options Report.

Table 1: Carbon Reduction Options consulted on as part of the Issues and Options Report (2012)

OPTION	DESCRIPTION
Option 44	Under this option, a 44% reduction in emissions would have been required for new residential development between 2014 and 2016. This equates to the level of carbon reduction sought by level 4 of the Code for Sustainable Homes. From 2016 onwards all new homes would need to be Zero Carbon, in line with national Zero Carbon policy, and as such on-site emission reductions between 44 – 60% would be required, with the remainder being dealt with via Allowable Solutions.
Option 45	Under this option, a target of on-site carbon reduction would be set which would go beyond the levels set within national Zero Carbon policy. Following technical and financial viability assessment, the Decarbonising Cambridge Study suggested that the level should be set at 70% on-site for all new housing development from 2014 onwards.
Option 46	Under this option, the levels of carbon reduction for new housing would be linked to those contained within Building Regulations

(Part L 2013 and 2016). In addition, up to 2016 this option would have seen a percentage renewable energy requirement continue to operate to ensure that renewable energy provision still played a role in new development proposals prior to the introduction of national Zero Carbon policy. This approach was based on the findings of the Merton Rule Study .

13. The figure of 70% on-site carbon reduction promoted via Option 45 is taken from the findings of the Decarbonising Cambridge Study (2010), which modelled the technical and economic feasibility of a range of on-site carbon reduction requirements. It concluded that 70% on-site carbon reduction, while ambitious, would be both technically and economically feasible for all scales of residential development. This conclusion is also set against the local economic climate of Cambridge, which has fared better than other parts of the UK including in terms of its housing market and house building.
14. The Decarbonising Cambridge study noted that this level of on-site carbon reduction could be subject to change but by enshrining the 70% carbon compliance level in local planning policy this would provide the opportunity to maintain a high on-site carbon reduction requirement, should Zero Carbon policy be amended to dilute the ambition in terms of on-site reduction. Indeed, the carbon compliance level has been reduced, in line with the recommendations of the Zero Carbon Hub's 2011 report on Carbon Compliance to between 44% and 60% depending on house type. There was strong support from residents for Cambridge to be ambitious in setting policy requirements for carbon reduction. The Interim Sustainability Appraisal of the Issues and Options Report also noted that taking such an approach would contribute positively to radically reducing carbon emissions across Cambridge. This would benefit Cambridge's economic position as a competitive city, putting it at the forefront of the low carbon economy, helping to address concerns surrounding fuel security and national targets for renewable energy generation.
15. Option 46 considered continuing to require percentage renewable energy provision on all development up to 2016, when national Zero Carbon policy would take effect. This option was consulted upon in light of changes being made to the 2013 version of Part L of the Building Regulations, to reduce the level of carbon reduction being sought from new housing development from 44% greater than Part L 2006, to 33%. With this approach it is likely that the utilisation of renewable energy would no longer form part of a development's carbon reduction strategy, which is of concern due to issues such as energy security and national targets for renewable energy generation. This option was based upon the findings of the Cambridgeshire Merton Rule Study (2012), which also recommended a technology specific approach, referred to as a 'solar first' approach. Under this option, residential developments would be required to utilise either photovoltaic panels or solar thermal systems, while non-residential development would be required to utilise photovoltaics. If these systems were not viable, then other forms of renewable or low carbon

energy generation would be considered. A more flexible approach was recommended for large estates such as the University of Cambridge, where a site-wide approach to renewable energy generation may be more appropriate.

16. Concerns were raised by developers as to the technology specific nature of this approach, as well as the impact on the viability of development. The arguments in favour of the solar first approach include that these technologies are relatively simple to monitor and enforce, and that costs have reduced dramatically since the introduction of the Feed In Tariff. However, in the past national planning policy has been opposed to technology specific policies, and indeed such an approach was removed from the North West Cambridge Area Action Plan at examination. There is no specific wording within the National Planning Policy Framework that would support or object to this approach, and as such it would be likely to be tested at examination.
17. In determining which policy approach to take forward into the draft Local Plan, a key factor has been the issue of conformity with the National Planning Policy Framework and its requirement for any local policy to be “consistent with the Government’s Zero Carbon policy”. Of the three approaches consulted on at the Issues and Options stage, the option of requiring a 44% reduction up to 2016, with the implementation of national Zero Carbon policy from 2016 is considered most likely to pass the test of conformity with the requirements of the National Planning Policy Framework. It provides developers with a step towards Zero Carbon development and indeed is the level of carbon reduction being delivered on many development sites within Cambridge at present and as such would not have a significant impact on the viability of new development.
18. While it is noted that this approach is not fully in keeping with the recommendations of the Decarbonising Cambridge Report, there is a concern that given the wording of the National Planning Policy Framework in relation to ‘consistency with national Zero Carbon policy’, this evidence base may not be sufficient to justify such a policy as it exceeds the level of carbon compliance which lies at the heart of the national Zero Carbon definition. Such an approach would no doubt be tested at examination. The option of setting a 44% on-site carbon reduction requirement did receive support at the Issues and Options consultation. The Interim Sustainability Appraisal of the Issues and Options Report noted that this approach would ensure that development was on the path to meeting Zero Carbon requirements in 2016, resulting in positive effects on many of the sustainability topics.
19. Officers are continuing to pursue discussions with the Department of Communities and Local Government to clarify the status of the Decarbonising Cambridge Study in light of the wording of the National Planning Policy Framework. These discussions could lead to a change in policy direction as the drafting of the Local Plan nears completion. It should also be noted that there are likely to be situations where development will be able to exceed the 44%

on-site requirement, for example, where development falls within the Strategic District Heating Area. In these circumstances, the policy would require developments to connect to existing or proposed heat networks, and these developments could well achieve levels of carbon reduction much closer to the 70% figure contained within the Decarbonising Cambridge Study.

20. Some representations to the Issues and Options Report, while supporting the aspiration for developments to connect to district heating, raised concerns around the impact on the viability of development. This not only concerned the costs of connecting to district heating, but the legal issues surrounding community energy networks and whether developers would have the right to connect. The proposed Strategic District Heating Area coincides with a project being undertaken by the City Council, in partnership with the University of Cambridge, to deliver a district heating network in Cambridge City Centre. An objective of this project is to deliver a scalable scheme that will be able to expand and connect to new and existing buildings, an objective that will be written into the Governance structure of the project, overcoming any concerns about whether or not new developments will have a right to connect. Detailed technical analysis of the heat loads in the City Centre has already been carried out to inform the development and design of the heat network, as has financial analysis.
21. Given the constrained nature of many City Centre development sites, including redevelopment sites, few energy options are available to developers to meet their carbon reduction requirements. District heating offers a cost effective solution for these sites, although viability will be an important consideration in any future policy requiring connection, not just economic viability but also the ability to connect. This approach is consistent with the requirements of the National Planning Policy Framework, which at paragraph 97 states that local authorities should “identify opportunities where development can draw its energy supply from decentralised, renewable or low carbon energy supply systems and for co-locating potential heat customers and suppliers”. The Interim Sustainability Appraisal of the Issues and Options Report noted that connection to district heating would provide a cost effective way for developers to meet their carbon reduction obligations, and could be positive in positioning Cambridge competitively in terms of energy security and leading in low carbon initiatives. It also has the potential to help alleviate fuel poverty amongst Cambridge residents at a time of rising energy costs as there will be more local control over energy costs.
22. As such, it is felt that a policy requiring new developments to connect to district heat networks where these are available, subject to the consideration of viability issues, is appropriate. District heating will be the subject of a Local Plan allocation as other renewable energy options for Cambridge are more likely to be small scale approaches such as solar panels, which are more likely to come forward on a case by case basis. District heating represents the best opportunity for large scale energy generation in Cambridge, hence why a Local

Plan allocation is considered to be important to help secure implementation of this technology in Cambridge.

23. Policy 27 also sets standards of water efficiency that will be sought from all new development, based on the requirements of the Code for Sustainable Homes and BREEAM. Cambridge is in an area of serious water stress as defined by the Environment Agency. The National Planning Policy Framework requires local authorities to adopt a pro-active approach to climate change and water supply and demand considerations (paragraph 94).
24. The Cambridge Water Company Resources Management Plan indicates that there is a finite supply of water in the region and, irrespective of climate change, action is required now to ensure the availability of water for future uses, including potable water supply and food production, without having a detrimental impact on the environment. Guidance contained in the Good Practice Guidance: Sustainable Design and Construction report (2012), produced to support the National Planning Policy Framework supports such an approach. It notes that there will be situations where it could be appropriate for Local Planning Authorities to anticipate levels of building sustainably in advance of those set out nationally, citing the example of areas where high water stress means that development without high water efficiency standards would be unacceptable for its proposed location. The main issues to consider when looking at water efficiency are the level of water consumption to be determined and the cost of any proposals. Developers have concerns that too low a consumption figure would lead to higher costs and therefore could potentially have an impact on the viability of developments. The National Planning Policy Framework states that issues such as water supply should be taken account of in the local plan over the long term. As there is a finite supply of water, higher levels of water efficiency now will ensure the viability of development in the long term.
25. Three alternative options for water efficiency in new homes and two alternative options for water efficiency on non-residential developments have been considered in reaching the final position proposed in Policy 27. For new homes options ranged from limiting water consumption to 105 litres/head/day, an option of 80 litres/head/day or requiring water neutrality. Water neutrality involves not only measures to reduce water consumption in new build, but also retrofitting water efficiency measures in the existing built environment. While such an option offers the most innovative and progressive approach to water efficiency, it may prove difficult to implement and would also be the most expensive option, which may impact on viability. There would also be inherent difficulties in applying retrofit measures to existing properties, with associated ongoing maintenance costs. As such, this option has been rejected. It should, however, be noted that the draft Water Bill, which was published in July 2012, is giving consideration to charging mechanisms and connection charges that may enable water neutrality to be implemented in the future without the need for a specific planning policy.

26. Representing an improvement on the existing situation, a second option was put forward for all new development to be designed to achieve a maximum water consumption of 80 litres per head per day, which is in line with Levels 5 and 6 of the Code for Sustainable Homes. This would offer higher water efficiency than is being delivered elsewhere in Cambridge, apart from the North West Cambridge development. In terms of the impact of setting requirements for water efficiency on the viability of development, this is being tested through the Council's emerging viability work.
27. A third option considered a policy approach whereby new development would need to be designed to achieve maximum water consumption of 105 litres/head/day, which is in line with Code for Sustainable Homes level 3 and 4. While this policy would have presented the least expensive option, it would still lead to an increase in the amount of water being used in Cambridge each year. As a result, this option would not go far enough to address long-term water availability, which has the potential to impact on the long-term viability of development, and as such this option has also been rejected. The need to set more stringent water efficiency requirements than that suggested by this option was supported by Cambridge Water who have made representations after the end of the Issues and Options consultation period. In addition, this option would be reliant on the installation of water efficient fittings that could easily be unknowingly replaced with less water efficient fittings throughout the life of the development. Given the severity of water stress in Cambridge, it is therefore considered appropriate to set a policy requiring higher levels of water efficiency than that proposed by this option, and as such a requirement of 80 litres/head/day will be taken forward into the draft Plan.
28. A high level of water efficiency in non-domestic buildings is generally less costly as a percentage of the overall construction cost to implement than in domestic buildings and therefore has a smaller impact on potential viability. There is also a higher potential for cost savings in water bills than in domestic properties. Two options were put forward in the Issues and Options Report, both linked to the BREEAM assessment methodology. Option 55 required full credits to be achieved for BREEAM water efficiency, while Option 56, while continuing to utilise the BREEAM methodology would not have required the achievement of maximum credits for water. While the advantages of Option 56 were that there would be minimal cost associated with it, water consumption reductions could be as low as 12.5% of current usage. As such, this option would have done little to respond to the severe water stress faced by Cambridge. Cambridge Water also objected to this approach on the grounds that it would not go far enough in dealing with issues of water shortage and its wider impacts. As such, the option of maximum BREEAM credits for water is to be taken forward into the draft Plan. This option received strong support during the Issues and Options consultation, with the Interim Sustainability Appraisal noting that it resulted in the most significant positive effects against the sustainability topics, as it is the most radical in terms of addressing the severe

water stress identified in Cambridge's Water Resources Management Plan. From an economic perspective, it was noted that whilst this option is the most expensive, it would place Cambridge in a competitive position in terms of leading on water efficiency Initiatives. This Option would also result in significant carbon emissions savings associated with water production, as overall increases in supply would be kept to a minimum.

Findings of the Sustainability Appraisal of the Cambridge Local Plan (July 2013)

29. The findings of the Sustainability Appraisal of the draft Cambridge Local Plan were that overall the plan would lead to significant positive effects in terms of the following SA objectives:
 - Reducing carbon emissions from all aspects of new developments and ensuring that development meets the highest standards in low carbon design;
 - Accounting for the whole life carbon cost of new development and transport infrastructure; and
 - Ensuring greater deployment of energy efficiency and renewable energy technologies.
30. The appraisal noted that the plan would require new development to incorporate a high level of emissions reductions and in due course lead to zero carbon development; whilst other policies would contribute to reducing the environmental impact of new development through retrofitting. District heat networks are proposed to lead a low carbon heat supply.
31. The embodied energy of construction materials would be reused and recycled in new construction which would reduce emissions used in the mining and manufacturing of new construction materials. In combination, all these policies should lead to significant positive effects in terms of reducing emissions and increasing energy efficiency. It would also lead to significant positive effects in terms of accounting for the lifetime carbon costs of development as it seeks to maximise resource efficiency.
32. The appraisal also noted that encouraging sustainable design techniques in order to capture solar gain during winter and provide natural ventilation and cooling in the summer should help protect against heat stress for people, particularly vulnerable people, older and young people. Measuring against the baseline situation, the appraisal concluded that the plan should lead to significant positive effects in terms of climate change adaptation and flood risk by ensuring that new development is resilient to climate change. The appraisal also considered that the requirements within the policy to integrate the principles of sustainable design and construction, and references to the use of green roofs and enhanced tree canopies, may help to support biodiversity as a co-benefit of adaptation. It also noted that the focus of the policy on emissions reductions and energy efficiency of new homes should help to lower

running costs and reduce fuel poverty, resulting in benefits in terms of community and wellbeing.

33. The appraisal noted that while the policies are stringent, the majority contain a viability caveat, which may mean that not all developments will comply with policy. While the viability clause could increase uncertainty over the implementation of the policies concerning emissions and renewable energy, it would increase certainty for development to come forward, leading to social and economic benefits.
34. On the issue of water consumption, the appraisal noted that it was important that the plan pays close regard to preserving water supply and quality in the city. On the whole, the appraisal considered that the plan was successful in this regard, incorporating strong requirements on new developments to incorporate water efficiency measures and to adopt a water sensitive approach. Given the standards set out in policy 27, the appraisal considered that significant positive effects on the water theme could be predicted. The appraisal did note that these requirements could be strengthened by the removal of the technical and economic viability considerations that are currently attached to the Plan's minimum water efficiency targets and the pursuit of water neutrality wherever possible. However, it is considered that the flexibility in the policy is required to reflect the fact that each individual planning application will need to be assessed on its own merits. Water neutrality would be difficult to achieve through planning alone as it requires the widespread implementation of water savings measures in the existing built environment, which would be difficult to enforce through the planning system. It should, however, be noted that the draft Water Bill, which was published in July 2012, is giving consideration to charging mechanisms and connection charges that may enable water neutrality to be implemented in the future without the need for a specific planning policy.
35. The Sustainability Appraisal did recommend that the Council work closely with applicants to ensure that design features, mitigation and infrastructure is implemented as fully as possible, given viability constraints. No changes were considered necessary to the policy in light of this recommendation, as this is a matter that would be addressed through the use of pre-application discussion meetings and through the use of the policy in the consideration of planning applications.
36. Further recommendations related to the connection to district heating requirement within policy 27 and ensuring that major development in the Strategic Heating area is defined and that conditions are only relaxed where there is significant impact on viability. The appraisal noted that the requirement to connect to district heating identified within the policy should help enhance environmental protection in the city centre in terms of climate change mitigation. With regards to the recommendations of the appraisal, the term major development is defined through the Town and Country Planning

(Development Management) (England) Order (2010) and is included within the glossary of the draft local plan. It is considered that the inclusion of ‘significant’ would not add anything further to the policy, as each development will be looked at on a case by case basis and it would be difficult to define ‘significant’.

Key Issues raised during Proposed Submission consultation

Policy 27: Carbon reduction, community energy networks, sustainable design and construction and water use	
Total Representations: 17	
Object: 9	Support: 8
Objections	<ul style="list-style-type: none"> • Policy should be deleted in light of the Housing Standards Review; • At Code 4 some schemes are unviable or are at the margins of viability; • Costs of meet water requirements of Level 5 of the Code for Sustainable Homes have not been assessed as part of viability assessment and are unnecessary in light of mooted changes to Building Regulations; • On-site generation is not always the most efficient way of generating power. Seeks a change to the plan (Table 4.1) to remove reference to “supplies energy from new, renewable energy sources” and to instead refer to “contributions will be sought to fund optimal renewable energy schemes situated either within or outside Cambridge”; • From 2016, the construction standard and carbon reduction from new homes should be more ambitious, in line with the findings of the Decarbonising Cambridge study and in light of the likelihood of rising national standards. Amend the plan to read “Level 4 and rising” for minimum Code standard, and “70% on-site, with the remainder dealt with through allowable solutions” for on-site reduction of regulated carbon emissions; • Definition of zero carbon fails to include reference to transport; • Do not consider that district heating has been considered in sufficient detail to assess whether it will be effective; • From 2016, all homes should be Level 6 of the Code for Sustainable Homes, not Level 4. • BREEAM standards simply cannot be met and result in cost prohibitions that prejudice viability; • Wording needs to be tightened - how can minimum standards not be enforceable; • BREEAM cannot be used for refurbishment of non-residential dwellings – amend policy to allow use of bespoke assessment

	<p>methodologies where BREEAM is not suitable and levels of attainment equivalent to or higher than BREEAM are set as targets;</p> <ul style="list-style-type: none"> • Part L attainment is already a legal requirement for new non-residential development, so is not a matter for policy. Instead, given that other aspects of non-residential requirements relate to BREEAM, the requirement should be to achieve full credits for the energy/carbon requirements of BREEAM; • Insert text to clarify the potential scope of national zero carbon policy for non-residential buildings; • Need to include a definition of ‘not technically or economically viable’ means and how this will be judged; • Include statement in the policy which states that “The council will actively encourage innovative approaches such as Passivhaus for new build and EnerPHit standards for retrofit which dramatically reduce heating demand”.
Support	<ul style="list-style-type: none"> • The Environment Agency supports the evidence base and the approach to ensuring a secure water supply and climate resilience. Text will need amending in relation to update the classification of Cambridge to water stressed – reclassification relates to water metre usage and not the overall availability of water which remains unchanged; • The policy is essential if sustainable development is to mean very much; • Full support for the driving principles behind this policy; • Welcome reference to viability in relation to BREEAM standards, as BREEAM ‘excellent’ is not always achievable at all scales of development; • Strong support for the policy and its applicability to all scales of development; • Cambridgeshire County Council welcomes reference to the submission of a Site Waste Management Plan and RECAP Toolkit.

37. Following consultation, a letter of support for the water efficiency elements of Policy 27 was received from Cambridge Water. A full version of this letter can be found in the Duty to Cooperate Report, but to summarise, the target for water consumption in new homes was supported, as it aligned with Cambridge Water’s aspirations for new dwellings as set out in their Water Resources Management Plan. It was considered that such a target was necessary to help protect water resource availability into the 2050s, and that the planning process was an appropriate mechanism to encourage or enforce adoption of these standards.

Minor Modifications suggested following Proposed Submission consultation and implications for Sustainability Appraisal

38. As a result of assessment, four minor modifications are suggested for Policy 27 Carbon reduction, community energy networks, sustainable design and construction and water use and Table 4.1 and paragraph 4.20 of the supporting text. These changes are in the Addendum to the Cambridge Local Plan 2014: Proposed Submission document marked as PM/4/001, PM/4/002, PM/4/003 and PM/4/004.
39. The first of these changes (PM/4/001) is a point of clarification in the tables showing the construction standards required for new homes and non-residential development. A footnote has been added to the Year columns of the tables to clarify that application of the policy relates to the financial year as follows:

New homes:

Year*	Minimum Code for Sustainable Homes standard	On-site reduction of regulated carbon emissions relative to Part L 2006	Water efficiency
2014	Level 4	44%	80 litres/head/day
2016	Level 4	44% - 60% on-site, with remainder dealt with through allowable solutions (as per national zero carbon policy)	80 litres/head/day

New non-residential development:

Year*	Minimum BREEAM Level	On-Site carbon reduction	Water efficiency
2014	Very good	In line with 2013 Part L	Full credits to be achieved for category Wat 01 of BREEAM
2016	Excellent	In line with 2016 Part L	Full credits to be achieved for category Wat 01 of BREEAM
2019	Excellent	In line with national zero	Full credits to be achieved for

		carbon policy	category Wat 01 of BREEAM
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* Application subject to financial year

40. Proposed modification PM/4/002, is an update to the references made to Part L 2013, which will now be introduced in April 2014. As such the policy text has been updated for the sake of clarity, as follows:

New non-residential development:

Year	Minimum BREEAM Level	On-Site carbon reduction	Water efficiency
2014	Very good	In line with 2013 <u>2014</u> Part L	Full credits to be achieved for category Wat 01 of BREEAM
2016	Excellent	In line with 2016 Part L	Full credits to be achieved for category Wat 01 of BREEAM
2019	Excellent	In line with national zero carbon policy	Full credits to be achieved for category Wat 01 of BREEAM

41. Proposed modification PM/4/003 is in response to a representation made by the University of Cambridge (representation number 26620) in relation to the approach to be taken to the refurbishment of existing buildings, which is not subject to existing sustainable construction standards such as BREEAM. Wording that was originally contained within paragraph 4.10 of the supporting text, is proposed to be moved into the policy text after the new non-residential development table as follows:

"Where redevelopment/refurbishment of existing buildings is proposed, the development of bespoke assessment methodologies to assess the environmental impact of the proposals for submission with the planning application will be supported, subject to agreement of the scope of the alternative methodology with the council. Proposals that lead to levels of environmental performance equivalent to or higher than BREEAM will be supported."

42. Proposed modification PM/4/004 is an amendment following a representation from the Environment Agency (representation number 27575). This representation related to the reclassification of the Cambridge area as an area

of 'moderate water stress' as opposed to the previous classification of the area being in 'severe water stress'. As such, references in Table 4.1 to 'severe water stress' have been amended to read 'water stress'. It should be noted that this reclassification has not led to any changes in the water availability forecasts made by Cambridge Water, which still show that there is a finite supply of water in the region and that action is required now to ensure the availability for future uses, including potable water supply, without having a detrimental impact on the environment and on the viability of development.

43. Following consideration of the impact of these changes on the Sustainability Appraisal Framework, it has been concluded that these changes do not materially alter the findings of the Sustainability Appraisal.

Policy 28: Allowable Solutions for Zero Carbon development

EXISTING POLICY TO BE REPLACED (CAMBRIDGE LOCAL PLAN 2006)	OPTION(S) BEING TAKEN FORWARD FROM THE ISSUES AND OPTIONS REPORT (2012) AND ISSUES AND OPTIONS 2 (2013)	OPTION(S) NOT BEING TAKEN FORWARD FROM THE ISSUES AND OPTIONS REPORT (2012)
Not applicable	Option 47 establishment of a Cambridgeshire Community Energy Fund	Not applicable

Key issues raised during Issues and Options (2012) and Issues and Options 2 (2013) consultations:

SECTION OF ISSUES AND OPTIONS REPORT (2012)	KEY ISSUES ARISING FROM CONSULTATION
Option 47: Establishment of a Cambridgeshire community energy fund. This option would enable the development of a community energy fund to provide developers with a route to compliance with national zero carbon policy.	<ul style="list-style-type: none"> • Concern that this is a way of allowing developers to do something on the cheap. Focus should be on on-site carbon reduction; • Support for the development of a fund particularly where projects for investment include retrofit of existing homes; • Support from some developers for the establishment of such a fund as a way of assisting them with meeting their zero carbon requirements; • Some concern about the extent to which the local benefit of such a fund would extend to City residents in circumstances where developers in the city would be paying into the fund which is then used to fund development elsewhere in the county; • More detail required on how such a fund would be governed and administered.

	Developers should still have the choice of different allowable solutions routes, although general principle behind the development of a fund is supported.
NEW OPTIONS ARISING FOLLOWING COMMUNITY INVOLVEMENT:	
Not applicable	

Evidence base:

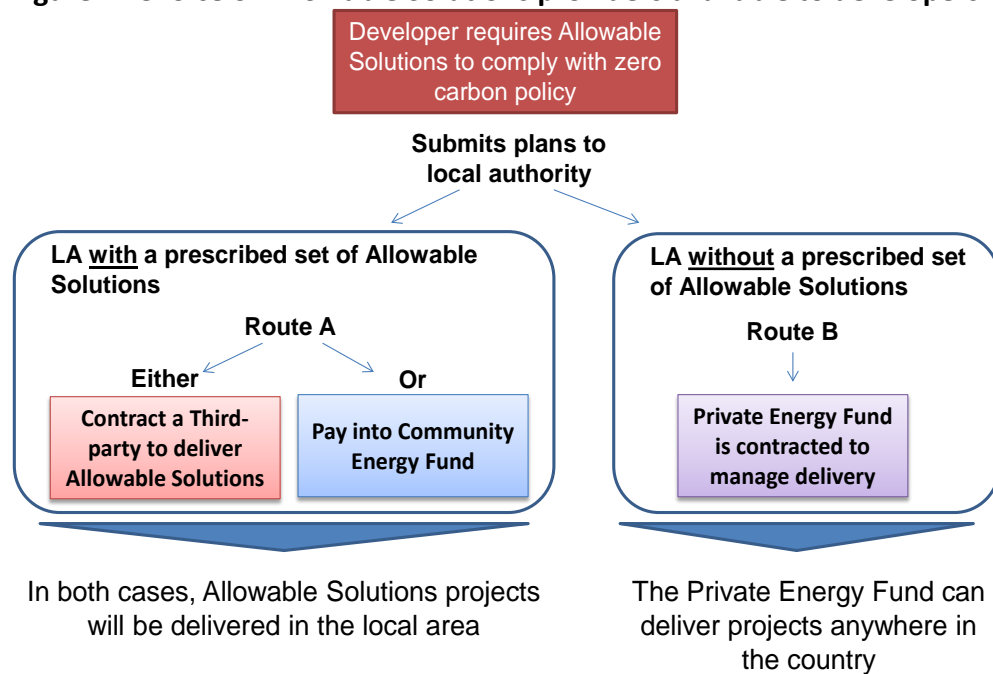
- Zero Carbon Hub (2011). Allowable Solutions for Tomorrow’s New Homes;
- Element Energy (2010). Scoping Report: Feasibility of a Carbon Offset Mechanism for Cambridgeshire;
- Element Energy, The Landscape Partnership & Manches (2012). Cambridgeshire Community Energy Fund Stage 2 Final Report
- Camco (2012). Cambridgeshire Renewables Infrastructure Framework – Baseline Data, Opportunities and Constraints;
- Zero Carbon Hub (2012). Allowable Solutions. Evaluating Opportunities and Priorities.

How the Policy Came About:

44. The concept of developing a policy related to the development of a Cambridgeshire Community Energy Fund stems from the work undertaken by the Zero Carbon Hub in their 2011 report “Allowable Solutions for Tomorrow’s New Homes. Towards a Workable Framework”. This report put forward to Government an Allowable Solutions Framework Model that would enable developers to meet their full Zero Carbon policy requirements once they had met their on-site carbon compliance requirements. This Framework is illustrated in Figure A below, and its key elements are:
1. A choice for Local Planning Authorities to develop a policy on Allowable Solutions through Local Plans (Route A);
 2. The opportunity, when working to Route A, for housing developers to seek out best value for Allowable Solutions via a Community Energy Fund or by private contract with a Third Party Provider;
 3. The option of purchasing Allowable Solutions from Private Energy Funds (Route B) when the local planning authority does not have an Allowable Solutions policy;
 4. A Verification and Certification Scheme to show that an investment will achieve the required carbon emission reduction. The scheme will monitor Allowable Solutions delivery and release credits, certificates and funds in a timely way to facilitate Allowable Solutions project development and Building Regulations Approval;
 5. A single Allowable Solutions Fund Holding providing a secure ‘Bank’ for the Allowable Solutions investment flow.
45. A number of representations received at the Issues and Options stage raised concerns that a Carbon Offset Fund would enable developers to do things on the cheap and that the focus should be on on-site measures to reduce carbon

emissions. While the Council agrees that the ideal solution would be for developers to offset all of their carbon emissions on-site, this is unlikely to be feasible on many small and medium scales sites, as evidenced by the findings of the Decarbonising Cambridge Study (2010), and national work carried out by the Zero Carbon Hub. As such, the concept of ‘allowable solutions’ has been developed. Developers would still be required to deliver the majority of carbon reduction on-site but would then have range of opportunities available to them to ‘off-set remaining emissions, including additional on-site measures or paying into a county-wide community energy fund. This approach is in keeping with the requirements of the National Planning Policy Framework, which requires local policy to be consistent with national Zero Carbon policy, in that it uses the nationally recognised Allowable Solutions Framework, which recognises a policy role for local planning authorities.

Figure A: Choice of Allowable Solutions providers available to developers¹



46. The types of projects that could receive investment from the fund range from energy efficiency projects through to large scale renewable and low carbon energy projects. The key element in determining appropriate projects is the idea of ‘additionality’, i.e. projects that would not otherwise be delivered via existing support mechanisms. Example projects could include improvements to existing properties that would not be eligible for Green Deal funding, for example solid wall insulation, or the investment in energy schemes that are not currently being delivered by the private sector, such as district heating. The development of a Cambridgeshire fund would also present an opportunity to focus on those projects that would have direct benefits for communities in the county, which could include community energy projects. This would be different from the current proposals for allowable solutions, which included

¹ Element Energy (2012). Cambridgeshire Community Energy Fund Stage 2 Final Report

reference to a national fund, where money generated from developments in Cambridge could be used to fund projects across the UK. The advantages of local funds were considered in the recent Zero Carbon Hub Report on [evaluating opportunities and priorities for Allowable Solutions](#) (2012), which recognised that in line with the Localism Agenda, preference would be for Allowable Solutions to be delivered locally. Developers would still be able to choose their preferred allowable solutions route, even with a policy in place, but there is recognition that local community energy funds represent an effective option, in keeping with the principles of Localism.

47. Projects for investment will be identified and form part of an Energy Efficiency and Renewable and Low Carbon Energy Infrastructure Projects List, which would then be used as the basis of allocating developers allowable solutions contributions. Work to develop this projects list is currently ongoing as part of the Mobilising Local Energy Investment Project, which is being coordinated by Cambridgeshire County Council. This work includes liaison with the Zero Carbon Hub and Department for Communities and Local Government, with the potential for the fund to be one of the Allowable Solutions Pilot Projects.
48. With regard to how such a fund would be governed and administered, work carried out by Element Energy² in 2012 considered a range of legal structures for the management of the fund. The work concluded that a Company Limited by Guarantee would be the most suitable structure as it would be suitable for the community investment mandate of an energy fund. While further work is required to determine the membership of the Company Limited by Guarantee, it would be likely that this would need to include all the district authorities who would be collecting monies into the fund. The study also considered appropriate collection mechanisms, concluding that a new purpose designed collection mechanism to enable developers to make direct payments into local community energy funds should be established nationally as opposed to utilising existing mechanisms such as S106 agreements and the Community Infrastructure Levy. Further work will need to include ongoing discussions with national government with regards to the timescales and practical arrangements for the establishment of the Allowable Solutions Framework, including the setting of an appropriate level of developer contribution into such a fund, set as a cost per tonne of CO₂. Work carried out to date has assumed a cost of £46 per tonne of CO₂.
49. The Element Energy study also considered the advantages of a county wide fund compared to a fund only covering Cambridge. Of the £55 million that a county wide fund could have generated by 2026, around £23 million would be generated by developments in Cambridge. The average amount being invested into the fund across the districts would be around £6 million, which is not huge in the context of capital costs of low carbon energy projects. For example, the district heating project in Cambridge City Centre has estimated capital costs of

² Element Energy (Jan 2012). Cambridgeshire Community Energy Fund Stage 2 Final Report

around £25 million. The relatively limited scale of the fund is considered to be a strong argument in favour of the Cambridgeshire authorities partnering in a joint community energy fund that will invest in the most beneficial projects across the county. A fund at a smaller district level scale would be too limited in terms of the funds available to significantly influence development of large-scale strategic infrastructure projects.

Findings of the Sustainability Appraisal of the Cambridge Local Plan (July 2013)

50. The findings of the Sustainability Appraisal of the draft Cambridge Local Plan were that overall the plan would lead to significant positive effects in terms of the following SA objectives:
- Reducing carbon emissions from all aspects of new developments and ensuring that development meets the highest standards in low carbon design;
 - Accounting for the whole life carbon cost of new development and transport infrastructure; and
 - Ensuring greater deployment of energy efficiency and renewable energy technologies.
51. The appraisal noted that while the policies are stringent, the majority contain a viability caveat, which may mean that not all developments will comply with policy. While the viability clause could increase uncertainty over the implementation of the policies concerning emissions and renewable energy, it would increase certainty for development to come forward, leading to social and economic benefits.

Key Issues raised during Proposed Submission consultation

Policy 28: Allowable solutions for zero carbon development	
Total Representations: 5	
Object: 1	Support: 4
Objections	<ul style="list-style-type: none"> • Policy is contrary to national policy as it is too prescriptive in how Allowable Solutions can be provided.
Support	<ul style="list-style-type: none"> • Where developers use this approach, it should be used to upgrade/retrofit local housing and other existing buildings; • Support this approach in principle, although further information about the operation of the programme is required.

Minor Modifications suggested following Proposed Submission consultation and implications for Sustainability Appraisal

52. No changes to Policy 28: Allowable solutions for zero carbon development or the supporting text are suggested in the Addendum to the Cambridge Local

Plan 2014: Proposed Submission document. There are therefore on impacts on the findings of the Sustainability Appraisal.

Policy 29: Renewable and Low Carbon Energy Generation

EXISTING POLICY TO BE REPLACED (CAMBRIDGE LOCAL PLAN 2006)	OPTION(S) BEING TAKEN FORWARD FROM THE ISSUES AND OPTIONS REPORT (2012) AND ISSUES AND OPTIONS 2 (2013)	OPTION(S) NOT BEING TAKEN FORWARD FROM THE ISSUES AND OPTIONS REPORT (2012)
8/17 Renewable Energy	Option 48 Renewable and low carbon energy generation	Not applicable

Key issues raised during Issues and Options (2012) and Issues and Options 2 (2013) consultations:

SECTION OF ISSUES AND OPTIONS REPORT (2012)	KEY ISSUES ARISING FROM CONSULTATION
Option 48: Renewable and low carbon energy generation. This option would allow for the development of a policy to promote renewable and low carbon energy generation in Cambridge.	<ul style="list-style-type: none"> • General support for development of a positive approach to renewable and low carbon energy; • A clear local policy will help planning and provision of more renewables; • Some concern from developers about the impact of connecting to district heating on the viability of development (although aspiration is supported); • Support for designation of strategic district heating areas – look to connect existing properties as well as new; • Consider opportunities to work with the local universities to deliver pilot renewable energy projects; • Need to evaluate potential for renewable energy in Cambridge and, if necessary, allocate sites for energy provision; • Could be an opportunity to use the city sewage works to generate energy via anaerobic digestions. The City’s green bin waste could also be added to this energy source; • Should include some indication of how energy is to be generated; • Policy should not solely focus on district heating.
NEW OPTIONS ARISING FOLLOWING COMMUNITY INVOLVEMENT	
Not applicable	

Evidence base:

- Aecom (2011). East of England Renewable and Low Carbon Energy Capacity Study;
- Decarbonising Cambridge Study (2010);
- Camco (2012). Cambridgeshire Renewables Infrastructure Framework – Baseline Data, Opportunities and Constraints;
- Cambridge City Council (2007) Sustainable Design and Construction SPD.

How the Policy Came About:

53. Paragraph 97 of the National Planning Policy Framework requires local planning authorities to recognise the responsibility on all local communities to contribute to energy generation from renewable or low carbon sources. It requires local planning authorities to have a positive strategy to promote energy from renewable and low carbon sources while ensuring that any adverse impacts are addressed. This policy seeks to provide this positive strategy, building upon the energy resource evidence provided by the Decarbonising Cambridge Study (2010) and the Cambridgeshire Renewables Infrastructure Framework (2012), which mapped the potential of a range of renewable and low carbon energy sources in Cambridge, including district heating, wind, solar and biomass.
54. These studies have shown that the opportunities for stand-alone renewable energy schemes within Cambridge are limited and new projects within the city are likely to be relatively small-scale. Even so, the Council wishes to support renewable and low carbon energy projects that will contribute to overall carbon reduction across Cambridge, while at the same time ensuring that there will be no unacceptable impact on the local environment. These considerations will include air quality concerns associated with proposals utilising biomass combustion, particularly where these fall within or close to the Air Quality Management Area or areas where air pollution levels approach the EU Limit Values, as well as noise issues associated with certain renewable and low carbon technologies. There could be links between identified projects and the proposals to develop a Cambridgeshire Community Energy Fund, in that some of these projects may be eligible for funding from the Community Energy Fund. Possible projects would be identified and form part of an energy efficiency and renewable and low carbon energy infrastructure projects list, which would then be used for the basis of allocating developers allowable solutions contributions.
55. The Interim Sustainability Appraisal of the Issues and Options Report concluded that such a policy would be likely to have a positive effect on key issues identified under the climate change mitigation and renewable energy themes. This included ensuring the greater deployment of renewable energy technologies and reducing carbon emissions from new developments. The Appraisal did note that there would be a need to balance energy provision

against other objectives such as protection and enhancement of the historic environment, which is provided for under Policy 29.

Findings of the Sustainability Appraisal of the Cambridge Local Plan (July 2013)

56. The findings of the Sustainability Appraisal of the draft Cambridge Local Plan were that overall the plan would lead to significant positive effects in terms of the following SA objectives:
- i. Reducing carbon emissions from all aspects of new developments and ensuring that development meets the highest standards in low carbon design;
 - ii. Accounting for the whole life carbon cost of new development and transport infrastructure; and
 - iii. Ensuring greater deployment of energy efficiency and renewable energy technologies.
57. The appraisal noted that considerations of impacts upon air quality is an element of this policy, which looks to ensure that proposals for renewable and low carbon energy generation do not result in negative effects; particularly within or close to AQMAs or where air pollution levels are approaching EU Limit Values. The appraisal concluded that this is likely to lead to positive effects in terms of health and wellbeing. In addition, the Policy calls for noise related impacts of such development to be addressed. It also noted that the criteria within the policy could also help to minimise negative effects for biodiversity.
58. One recommendation made by the appraisal was that the considerations of the policy should be broadened to include the impacts of all forms of energy infrastructure. However, it was considered that as the focus of the policy is on increasing the proportion of energy generated from renewable and low carbon energy sources, such an amendment would not be appropriate. Other policies in the local plan deal with minimising the impact of development on the environment, for example the policies dealing with design, flood risk, light pollution, protection of human health from noise and vibration and air quality, and these would be used to determine any applications for other forms of energy infrastructure.

Key Issues raised during Proposed Submission Consultation

Policy 29: Renewable and low carbon energy generation	
Total Representations: 3	
Object: 1	Support: 2
Objections	<ul style="list-style-type: none"> • Support the principle of the policy but consider bullet point (a) should not be qualified by the statement “as far as possible”; • Would query the statement that regarding opportunities for

	district heating due to expense and that opportunities for stand-alone renewable energy schemes are limited.
Support	<ul style="list-style-type: none"> Fully support objectives.

Minor Modifications suggested following Proposed Submission consultation and implications for Sustainability Appraisal

59. As a result of assessment, one minor modification is proposed to paragraph 4.20 of the supporting text of Policy 29. This change is in the Addendum to the Cambridge Local Plan 2014: Proposed Submission Document marked as PM/4/005.

60. To provide clarity and in response to a representation from Natural England, it is proposed that this paragraph be reworded to read:

“Other policies in the local plan and the National Planning Policy Framework relate to the safeguarding of the natural and historic environment and the protection of international, national or locally-designated sites and buildings, and these should be taken into account in applications for energy schemes.”

Policy 30: Energy efficiency improvements in existing dwellings

EXISTING POLICY TO BE REPLACED (CAMBRIDGE LOCAL PLAN 2006)	OPTION(S) BEING TAKEN FORWARD FROM THE ISSUES AND OPTIONS REPORT (2012) AND ISSUES AND OPTIONS 2 (2013)	OPTION(S) NOT BEING TAKEN FORWARD FROM THE ISSUES AND OPTIONS REPORT (2012)
Not applicable	Option 50 Consequential improvements policy	Not applicable

Key issues raised during Issues and Options (2012) and Issues and Options 2 (2013) consultations:

SECTION OF ISSUES AND OPTIONS REPORT (2012)	KEY ISSUES ARISING FROM CONSULTATION
Option 50:	<ul style="list-style-type: none"> Some support for the development of such a policy; Concern over the cost implications for householders and landowners of such a policy; Implementation should not be required but encouraged and long-term financial advantages of implementation should be made clear; Need for care when dealing with heritage assets; Make reference to the Cambridge Retrofit project.

NEW OPTIONS ARISING FOLLOWING COMMUNITY INVOLVEMENT
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Not applicable

Evidence base:

- Element Energy for Cambridge City Council. Decarbonising Cambridge Study (2010);
- CLG (2012). 2012 Consultation on changes to the Building Regulations in England. Section two – Part L (Conservation of fuel and power).

How the Policy Came About:

61. In order for Cambridge to play a role in tackling national targets for carbon reduction, it is important to tackle emissions from existing buildings as well as new. Such an approach is supported by the National Planning Policy Framework, which at paragraph 95 states that local planning authorities should “actively support energy efficiency improvements to existing buildings”. For non-residential buildings there are many drivers for organisations to improve the efficiency of their buildings, but this is not the case for existing houses. At present requirements to improve the energy efficiency of new homes, sought through Building Regulations, only apply to dwellings over 1,000m², and as such many homes within Cambridge would not be required to comply with these Regulations.
62. The Council’s 2009 Housing Stock Survey found that of a total stock of 41,500 dwellings, there was scope for energy efficiency improvements in 95% of properties, including measures such as loft insulation, cavity wall insulation and cylinder insulation. Energy efficiency improvements typically provide relatively cost-effective carbon reduction, but can also help reduce energy bills for residents, which will become increasingly important in the face of rising energy costs. It is estimated that fuel poverty affects 14% of households in Cambridge, with this figure likely to rise as energy costs increase. A recent report by the Committee on Climate Change recognises the scope for local authorities to require energy efficiency improvements in return for granting planning permission for extensions, citing Uttlesford District Council’s approach as an example of best practice.
63. The intention is to introduce a policy, similar to that developed by Uttlesford District Council, which would apply to planning applications for works such as an extensions or loft conversions. Works that would be covered by the General Permitted Development Order, would not need to meet the requirements of this policy. The policy would require the implementation of cost effective measures to improve the energy efficiency of the entire property where such measures had not already been undertaken. These measures are considered in more detail in table 2 below. Concerns expressed during the Issues and Options consultation surrounding the expense to homeowners of such a policy are recognised, but the focus would be on cost effective measures, defined as

measures having a simple pay back of seven years or less. The type of measures that will be promoted include upgrading loft insulation, insulating cavity walls, improving draft proofing and heating controls upgrade. The best value for money way to pay for these improvements would be upfront, although many of these measures may also be eligible for funding through the Green Deal, which came into effect in January 2013. As such, the cost to homeowners would be limited, but they would still benefit from reduced energy costs as a result of increase the energy efficiency of their home.

Table 2: Measures for implementation under Policy 12 (Figures based on information from the Energy Savings Trust)

LOFT INSULATION				
	Loft Insulation (0 to 270mm)		Lost insulation (100 to 270mm)	
Approximate saving per year	Up to £180		£25	
Installation cost	Around £300*		Up to £300*	
Time taken to pay for itself	Up to two years		Up to twelve years	
DIY cost	From £250**		From £150**	
Time taken to pay for itself	From two years		From five years	
Carbon dioxide saving per year	Around 730 kg		Around 110 kg	
<p>These are estimates based on insulating a gas-heated, semi-detached home with three bedrooms, showing savings when you insulate an uninsulated loft, and when you top up 100mm of insulation to 270mm. (The recommended depth for mineral wool insulation is 270mm but other materials need different depths).</p> <p>*Average unsubsidised professional installation costs, loft top up assumed to be up to £300 although these may vary.</p> <p>**DIY costs are based on average retailer costs for insulation up to 270mm or more, based on a 44m² loft.</p>				
CAVITY WALL INSULATION				
Measure	Annual saving	Installation cost	Payback time	Carbon dioxide saving per year
Cavity wall insulation	Up to £140	£450 to £500	Under 4 years	Around 560kg
<p>These are estimated figures based on insulating a gas-heated, semi-detached home with three bedrooms. The average installed cost is unsubsidised.</p>				

REPLACEMENT BOILERS		
Savings will be dependent on how old and inefficient your existing boiler is:		
Old boiler rating	Annual saving	Carbon dioxide saving per year
G (< 70%)	£310	1,200kg
F (70–74%)	£205	810kg
<p>These are estimated figures based on installing a new A-rated condensing boiler and full set of heating controls in a gas-heated, semi-detached gas heated home with three bedrooms.</p> <p>The costs for replacing a boiler will vary, but a straightforward gas boiler replacement will typically cost around £2,300.</p>		
HEATING CONTROLS		
<p>Whatever the age of your boiler, the right controls will let you set your heating and hot water to come on and off when you need them, heat just the areas of your home you want, and decide how warm you want each area to be. Here are the average savings you could make in a typical three-bedroom semi-detached home, heated by gas:</p> <ul style="list-style-type: none"> • Install a room thermostat if you didn't have one before: £70 and 280kg carbon dioxide a year. • Fit a hot water tank thermostat: £30 and 130kg carbon dioxide a year. • Fit a hot water tank insulation jacket: £45 and 170kg carbon dioxide a year. 		
DRAUGHT PROOFING		
<p>DIY draught proofing typically costs around £100 for materials, while professional draught proofing may cost around £200. Full draught proofing could save an average of £55 per year, although the focus for this policy will be draught proofing of doors and letter boxes.</p>		

64. Some respondents to the Issues and Options consultation raised concerns that such an approach would increase 'red tape' for those wishing to extend their homes. It is not the intention of the policy to increase red tape, but to encourage residents to take advantage of the opportunities that carrying out works to their homes present: opportunities that should help to reduce energy bills and enhance the comfort of their homes. There will also be further advantages in implementing this policy, as by making improvements to the efficiency of their homes, this will enable residents to access other financial incentives such as the Feed in Tariff, with access to the higher tariff levels influenced by the energy performance of homes. There could be some risks associated with such a policy approach given the Government's recent announcements on increasing the size of household extensions that will be considered under permitted development rights. This could reduce the number of applications received for household extensions, thereby reducing the application of this policy, although planning permission would still be required within Conservation Areas.

65. The focus of the policy would be on existing homes as opposed to non-residential properties, which are more likely to be covered by existing Building Regulations requirements for consequential improvements. As such, it would not apply to College buildings etc, which are considered in more detail in the policy on works to address climate change in heritage assets. Care will need to be taken in applying the proposed policy to historic buildings to ensure that they are not damaged by inappropriate interventions. The implementation of the policy will be on a case by case basis, with officers recommending measures that would be suitable for that particular property, bearing in mind its age, type of construction and historic significance.
66. It is helpful to consider the development of this policy against the Governments recent announcement that they will not be requiring consequential improvements to existing homes through the 2013 update of Building Regulations. One of the main arguments for not pursuing this was that research indicated that the majority of people were not in favour of such an approach and that it would put them off making improvements to their homes. The research in question was undertaken on behalf of the Energy Savings Trust in the Report “Exploratory Research into Building Regulations in relation to the Green Deal”. The statistic quoted by the Government was that 38% of householders and businesses would be put off improving their homes if they had to make consequential improvements at the same time. However, as noted by the Energy Savings Trust³ in their response to the Government’s announcement to abolish the proposed amendments to consequential improvements, this overlooks the fact that 58% of respondents would still be likely to go ahead with such improvements. Further findings of the study were that:
- Seven out of ten homeowners asked think that energy efficiency of homes has a major impact of Britain’s carbon emissions;
 - Over three-quarters (77%) felt that “more should be done by Government to help people make their homes more energy efficient”;
 - Extending building regulations was felt to be reasonable by 63% of respondents, with this figure increasing to 76% when the Green Deal could be used to finance the additional energy efficiency improvements;
 - Only 6% of respondents thought that consequential improvements would be “wholly unreasonable”.
67. There are also examples of local consequential improvements policies that have worked well. Uttlesford District Council has been running a version of consequential improvements since 2006 to great success. Between 2006 and 2009 it was applied to 1,400 householder applications, with expected carbon savings of around 398,000 Kg CO₂ per year. Uttlesford District Council is

³ <http://www.energysavingtrust.org.uk/blog/2012/12/17/consequential-improvements-behind-the-headlines/>

looking to continue this approach with a policy in their Draft Local Plan (June 2012)⁴.

68. Concerns surrounding the take up of the Green Deal and the possibility of residents being misled by rogue traders, highlighted in Aecom's 2012 report on Consequential Improvements, should be overcome by the council's role as a Green Deal Promoter. Cambridge City Council, alongside the other Cambridgeshire local authorities and Cambridgeshire County Council will be taking a partnership approach to delivering the Green Deal across the county, in order to ensure that it is a success and that the uptake of energy efficiency measures in buildings is maximised. Working with a local Green Deal provider, the authorities will be taking an active role in promoting the Green Deal to local residents, which will assist with the delivery of this policy. There are a number of benefits for residents in the authorities taking such an approach, including:
- Helping to reduce fuel poverty amongst Cambridge residents;
 - Ensuring good value, high quality energy efficiency installations with outstanding quality of work and customer care; and
 - Boosting the local economy through employment, skills and learning and expansion and development of the energy efficiency and micro-generation business sector.

Findings of the Sustainability Appraisal of the Cambridge Local Plan (July 2013)

69. The findings of the Sustainability Appraisal of the draft Cambridge Local Plan, were that overall the plan would lead to significant positive effects in terms of the following SA objectives:
- i. Reducing carbon emissions from all aspects of new developments and ensuring that development meets the highest standards in low carbon design;
 - ii. Accounting for the whole life carbon cost of new development and transport infrastructure; and
 - iii. Ensuring greater deployment of energy efficiency and renewable energy technologies.
70. With regards to the Sustainability theme of community and wellbeing, the appraisal that the focus of this policy was on improving energy efficiency in existing homes where applications are made for extensions and conversions. This should help to lower running costs and reduce fuel poverty, resulting in benefits in terms of community and wellbeing.
71. The retrofitting of buildings should help to improve their environmental performance, leading to a reduction overall in domestic carbon emissions. As such, the policy should also lead to significant positive effects in terms of

⁴ Policy EN1 – Sustainable Energy requires proportionate improvements to the energy efficiency of existing dwellings when granting permission for residential extensions and/or the conversion of ancillary floorspace to living accommodation.

emissions as Cambridge is an historic city with many older and energy-inefficient homes which will benefit from the policy.

Key Issues raised during Proposed Submission consultation

Policy 30: Energy efficiency improvements in existing dwellings.	
Total Representations: 5	
Object: 1	Support: 4
Objections	<ul style="list-style-type: none"> • Query the restriction of some elements such as draught proofing – amend the plan to read “draught proofing to doors, windows, letter boxes and other points where the external envelope is compromised.”
Support	<ul style="list-style-type: none"> • Full support for policy – an opportunity that cannot be missed. Supporting text could include reference to evidence clearly linking energy efficiency, the Energy Performance Certificate rating and the value of a property; • One of the few measures by which the council can require improvements to existing dwellings – fully support.

Minor Modifications suggested following Proposed Submission consultation and implications for Sustainability Appraisal

72. As a result of assessment, two minor modifications are suggested for Policy 30 energy efficiency improvements in existing dwellings and paragraph 4.23 of the supporting text. These changes are in the Addendum to the Cambridge Local Plan 2014: Proposed Submission document marked as PM/4/006 and PM/4/007.
73. The first of these proposed minor modifications (PM/4/006) relates to the draught proofing measures promoted by the policy, and is in direct response to a representation (representation number 26652). Reference to the draught proofing of other points where the external envelope has been compromised has been added to the policy, to widen the scope of cost effective measures that address the whole house that can be implemented to meet the policy requirements. The wording of the proposed modification is as follows:

" e. draught ~~stripping of~~ proofing to doors and, windows, letter boxes and other points where the external envelope is compromised"
74. The second proposed minor modification (PM/4/007) is again in response to a representation (representation number 26952). An additional sentence is proposed for paragraph 4.23 of the supporting text to Policy 30, which makes reference to research indicating that carrying out energy efficiency measures can increase the value of properties. This change has been suggested to clarify the benefits of the policy and is as follows:

“The aim of this policy is to help homeowners implement measures that will enhance the energy efficiency of their homes, helping to reduce fuel costs at a time of rising energy prices. This might help reduce the risk of some homeowners finding themselves in fuel poverty, or in cases where residents are already in fuel poverty, help to get them out of this situation. There is also some evidence to suggest that carrying out energy efficiency measures can also increase the value of properties. The focus is on cost-effective measures with a simple payback of seven years or less and that would be relatively simple to install with limited disruption. Many of these measures will be eligible for funding through the national Green Deal scheme.”

75. Following consideration of the impact of these changes on the Sustainability Appraisal Framework, it has been concluded that these changes do not materially alter the findings of the Sustainability Appraisal.

Policy 31: Integrated water management and the water cycle

EXISTING POLICY TO BE REPLACED (CAMBRIDGE LOCAL PLAN 2006)	OPTION(S) BEING TAKEN FORWARD FROM THE ISSUES AND OPTIONS REPORT (2012) AND ISSUES AND OPTIONS 2 (2013)	OPTION(S) NOT BEING TAKEN FORWARD FROM THE ISSUES AND OPTIONS REPORT (2012)
9/3, clause m Development in the Urban Extensions	<ul style="list-style-type: none"> • Option 51 Develop a comprehensive integrated water management policy; • Option 58 Develop a water body quality policy; • Option 59 Develop a green roof policy 	Not applicable

Key issues raised during Issues and Options (2012) and Issues and Options 2 (2013) consultations:

SECTION OF ISSUES AND OPTIONS REPORT (2012)	KEY ISSUES ARISING FROM CONSULTATION
Option 51: Develop a comprehensive integrated water management policy. This option seeks to ensure that water	<ul style="list-style-type: none"> • Very important policy to develop – strong level of support; • Concern that requirement to set aside 10-15% of development area for open space/multi-functional surface water management could impact on viability of development.

management proposals are integrated into the overall design of development proposals	
Option 58: Develop a water body quality policy. This option would allow for the development of a policy that would seek the improvement of the quality of water bodies affected by development proposals	<ul style="list-style-type: none"> • Strong level of support for development of such a policy.
Option 59: Develop a green roof policy. This option would help to deliver green roofs on new developments	<ul style="list-style-type: none"> • Some support for this approach from residents and other stakeholders due to their multiple benefits; • There are some concerns surrounding the impact on the viability of new development, conflict with renewable energy provision and the long-term maintenance costs of green roofs; • The Local Plan should not be too prescriptive.
NEW OPTIONS ARISING FOLLOWING COMMUNITY INVOLVEMENT	
No additional options have been suggested.	

Evidence base:

- Draft National Standards for sustainable drainage systems: Designing, constructing, operating and maintaining drainage for surface runoff, DEFRA (2011);
- Cambridge Water Cycle Strategy Phase 1 (2008) and Phase 2 (2011);
- Cambridgeshire Green Infrastructure Strategy (2011);
- The National Flood and Coastal Erosion Risk Management Strategy for England (2011);
- Environment Agency, Anglian River Basin Management Plan (2009);
- Living roofs and walls technical report: supporting London Plan Policy, Greater London Authority (2008);
- Cambridge and Milton Surface Water Management Plan (2011).

How the Policy Came About:

76. Water sensitive design is an approach that considers water as a valuable resource in terms of re-use, visual amenity, biodiversity enhancement and its

wider benefits such as providing opportunities for recreation and its role in food production. This approach manages surface water runoff in the most sustainable way, integrating it within the landscape, cleaning the water as it passes through the system and reducing the risk of flooding to the development, adjacent land and land downstream. Water is re-used wherever possible, reducing the burden on drinking water supplies. This is considered the most efficient and cost effective way of managing surface water as evidenced by the Water sensitive urban design scoping study produced by CIRIA⁵).

77. In accordance with the findings of the Green Infrastructure Study⁶ and the National Planning Policy Framework, surface water management should be integrated into our natural spaces (green infrastructure), existing water bodies (blue infrastructure) and our built environment (grey infrastructure). This increases the efficiency of water management and maximises their multiple benefits.
78. One of the core planning principles of the National Planning Policy Framework (paragraph 17) is that planning should take full account of flood risk, encourage the use of existing resources and encourage the use of land for multiple benefits. The Flood and Water Management Act⁷ and National and Local Flood and Coastal Erosion Risk Management Strategies⁸ espouses consideration of flood risk being central to planning and highlights the positive benefit to existing issues that good design within new developments can bring. The National Planning Policy Framework also requires that when determining planning applications, local planning authorities should ensure flood risk is not increased elsewhere.
79. This policy is about the promotion of the continued delivery of what is considered current best practice in terms of the design of sustainable drainage systems in Cambridge and how to realise the range of benefits they offer through high quality design. This draws on the recommendations of the National Planning Policy Framework and the principles of good design contained with the draft National SuDS Standards⁹ published by Defra.
80. Sustainable drainage systems are often seen as additions to a development to deal with the problem of surface water and they do not always fully realise the multifunctional benefits they offer. The key to successful management of surface water within a development is to have it integrated within the development and to think about this at the earliest possible opportunity in the design process. (Planning for SuDS CIRIA C687).

⁵<http://www.ciria.org/service/knowledgebase/AM/ContentManagerNet/ContentDisplay.aspx?Section=knowledgebase&ContentID=23581>

⁶ http://www.cambridgeshirehorizons.co.uk/our_challenge/GIS.aspx

⁷ <http://www.legislation.gov.uk/ukpga/2010/29/contents>

⁸ <http://www.environment-agency.gov.uk/research/policy/130073.aspx>

⁹ <http://www.defra.gov.uk/consult/files/suds-consult-annexa-national-standards-111221.pdf>

81. This policy is a manifestation of the recommendation with the Water Cycle Strategy Phase 2 (July 2011) REC SWM 110: Planning policy recommendations: Surface water management:
- Development should achieve 100% above ground surface water drainage except where this is not feasible due to housing densities, land take, ground conditions, topography, or other circumstances outlined within the development proposals.
 - Where 100% above ground drainage is not feasible due to the size of development (i.e. windfall and non-strategic developments) or proposed high densities, the development proposals should maximise opportunities to use SUDS measures which require no additional land take, i.e. green roofs, permeable surfaces and water butts.
 - Development proposals should ensure that surface water drainage is integrated within the built environment. In addition, surface water drainage proposals should maximise opportunities to create amenity, enhance biodiversity, and contribute to a network of green (and blue) open space, in tandem with the Cambridgeshire Green Infrastructure Strategy to 2031¹¹.
 - Surface water drainage should be considered at an early stage of the master planning process, to allow maximum integration of drainage and open space, and to minimise the additional land take required by above ground drainage.
82. The Interim Sustainability Appraisal of the Issues and Options Report indicated that this option would be beneficial to Cambridge and the new communities created with integrated water management techniques. This policy approach would ensure that water management proposals form an integrated element of the overall design of developments, which will in turn lead to water management solutions that offer multiple benefits beyond just reduction of flood risk, including the enhancement of biodiversity and mitigation of the urban heat island effect.
83. In the consultation responses, there were concerns about having a prescriptive approach to assigning land use to multi-functional water management features and the effect on the viability of a development. This has been noted and a less prescriptive approach to encouraging best practice has been incorporated into the development of the policy as development sites within the City Centre may require a larger open space to built form ratio to be viable. This policy encourages best practice without restricting percentages of open space through the use of rainwater harvesting and/or green roofs.
84. The policy also includes requirements related to the provision of green/brown roofs. All extensive green roofs provide better returns on investment than shingle or paving based inverted roofs. Extensive substrate base roofs that are hydro-seeded or bio-diverse provide better returns on investment than a basic

¹⁰http://www.cambridgeshirehorizons.co.uk/documents/environment/cambridge_area_wcs_phase2.pdf

¹¹ http://www.cambridgeshirehorizons.co.uk/our_challenge/GIS.aspx

bare roof. Semi-extensive roofs also provide better returns on investment than inverted roofs.¹²

85. Green/brown roofs offer multiple benefits in terms of surface water management, amenity, biodiversity, water quality improvements, carbon reduction, noise attenuation, and reduction of the urban heat island effect, and they can be more cost effective than conventional roofs, as noted in the [Living Roofs and Wall Technical Report](#).
86. Some respondents raised concerns about the impact of such a policy on the viability of development. However, as evidenced by the Living Roofs and Walls Technical Report (2008)¹², if the right type of green/brown roof is used in the right location they can be more cost effective than traditional roofs and can increase the time between major maintenance on flat roofs.
87. In dense urban environments, green/brown roofs can often be the only effective measure in combating the cumulative detrimental impact of urban creep associated with minor developments in terms of flood risk. Because of the nature of the high levels of surface water flood risk in Cambridge, this policy enables minor development without adding to that risk.
88. As the sustainability appraisal states, the use of green/brown roofs can also reduce the urban heat island effect and contribute to an overall climate change adaptation position which is required under the Planning Act and a core planning principle of the National Planning Policy Framework.
89. It is recognised that green roofs are not appropriate in all situations and this has been reflected in the creation of the policy, for example in certain instances where they may not relate well to the historic environment.
90. Current water body quality status in Cambridge is:
 - The Cam (upstream) – ‘poor’;
 - The Cam (downstream) – ‘moderate’;
 - Bin Brook – ‘moderate’;
 - Hobson’s Brook – ‘moderate’;
 - Cherry Hinton Brook – ‘moderate’¹³.
91. The Water Framework Directive requires that all water bodies are at ‘good’ status by 2015.
92. The Council has a duty to ensure that there is improvement to water body quality through its policies and actions, including planning. When considered in the context of the [Anglian River Basin Management Plan](#) (2009) and the Water

¹² Greater London Authority, 2008, Living Roofs and Walls Technical Report. www.london.gov.uk/sites/default/files/uploads/living-roofs.pdf

¹³ Environment Agency (2009), Anglian River Basin Management Plan

Framework Directive (2000), the status of the water body quality in Cambridge currently varies from 'poor' to 'moderate' across a number of water bodies and groundwater supplies including the Cam and Ely Ouse Chalk. Cambridge's water bodies have not achieved 'good' status as a result of canalisation, with a loss of their natural characteristics, and the flow of untreated surface water runoff into the watercourses and the River Cam.

93. Only one option was put forward for policy development because the Council has a statutory duty to have regard to the Water Framework Directive and the associated Anglian River Basin Management Plan. The National Planning Policy Framework is clear that the planning system should contribute to and enhance the natural and local environment, including preventing new development from contributing to water pollution. This option attracted strong support at the Issues and Options consultation, with the Interim Sustainability Appraisal noting that it would have many positive benefits across a number of sustainability themes.

Findings of the Sustainability Appraisal of the Cambridge Local Plan (July 2013)

94. The Sustainability Appraisal notes that where SuDS are combined with high quality landscaping, they can deliver multi-functional green and blue infrastructure, which can deliver a range of benefits, including providing links and routes for species to migrate. Measuring against the baseline situation, the plan should lead to significant positive effects in terms of climate change adaptation and flood risk by ensuring that new development is resilient to climate change and contributes towards reducing flood risk across the city.
95. The appraisal notes that this policy is a key element of the Local Plan in terms of addressing Cambridge's water issues in the context of growth. The policy calls for water re-use where practical, offsetting potable water demand and a water sensitive approach to the design of new developments. Under the sustainability theme of biodiversity, the appraisal noted that the requirements within the policy for developments adjacent to a water body to actively seek to enhance and, where possible, re-naturalise, such features should help to enhance the biodiversity potential of water bodies. Requirements related to the provision of green and brown roofs should also have the positive impact of boosting biodiversity.
96. The appraisal does make a recommendation for the Council to encourage flood risk management in new development to take into account the role SuDS can play in reducing the pollution of watercourses. An intrinsic benefits of SuDS is their role in reducing pollution of watercourses. Policy 31 seeks to ensure that all surface water that is discharged to the ground or into rivers, watercourses and sewers has an appropriate level of treatment to reduce the risk of diffuse pollution. As such, it is not considered necessary to repeat this in the policy.

Key Issues raised during Proposed Submission consultation

Policy 31: Integrated water management and the water cycle	
Total Representations: 8	
Object: 3	Support: 5
Objections	<ul style="list-style-type: none"> • Support the policy but routine and widespread rainwater collection for re-use should be included; • More flexibility required as some of measures referenced will not be applicable/acceptable in all situations (e.g. green/brown roofs on labs or operating theatres), include reference to where practical or where possible in criterion (f).
Support	<ul style="list-style-type: none"> • Full support for the policy; • Welcome reference to green/brown roofs – would be ideal if they could be ‘biodiverse’ roofs; • The Environment Agency regards the Surface Water Management Plan and Strategic Flood Risk Assessment for Cambridge as being robust and up to date evidence bases. The Environment Agency fully supports the policy; • Anglian Water supports the policy which gives a strong message on surface water management and climate change adaptation/mitigation.

97. Following consultation, a letter of support for Policy 31 was received from Cambridge Water. A full version of this letter can be found in the Duty to Cooperate Report, but to summarise, references to the re-use of water within this policy were supported as offsetting potable water demand by re-using or recycling water and conserving water in the environment are key aspects of Cambridge Water’s long term vision for the most sustainable use of water resources. Continued promotion of water efficiency is a duty for Cambridge Water stated in the Water Act, and is important in the management of demand for water. The policies set out in the Proposed Submission Draft Local Plan were considered to be important in helping to ensure that growth is delivered in the most sustainable manner.

Minor Modifications suggested following Proposed Submission consultation and implications for Sustainability Appraisal

98. As a result of assessment, one minor modification is suggested for Policy 31 Integrated water management and the water cycle. This change can be found in the Addendum to the Cambridge Local Plan 2014: Proposed Submission document marked as PM/4/008.
99. This change relates to criterion k of Policy 31, and is in direct response to a representation received from the Environment Agency (representation number

27585). This criterion requires all hard surfaces to be permeable, where reasonably practicable, in order to reduce the risk of surface water flooding. While supportive of this approach, the Environment Agency were keen to ensure that such a practice did not impact on groundwater. Given the importance and vulnerability of aquifers in and around Cambridge, it is suggested that reference to groundwater protection is added to the end of criterion k, as follows:

“k. All hard surfaces are permeable surfaces where reasonably practicable, and having regard to groundwater protection.”

100. Following consideration of the impact of these changes on the Sustainability Appraisal Framework, it has been concluded that this change does not materially alter the findings of the Sustainability Appraisal.

Policy 32: Flood Risk

EXISTING POLICY TO BE REPLACED (CAMBRIDGE LOCAL PLAN 2006)	OPTION(S) BEING TAKEN FORWARD FROM THE ISSUES AND OPTIONS REPORT (2012) AND ISSUES AND OPTIONS 2 (2013)	OPTION(S) NOT BEING TAKEN FORWARD FROM THE ISSUES AND OPTIONS REPORT (2012)
Flood risk	Option 57 Develop a comprehensive flood risk reduction policy	Not applicable

Key issues raised during Issues and Options (2012) and Issues and Options 2 (2013) consultations:

SECTION OF THE ISSUES AND OPTIONS REPORT (2012)	KEY ISSUES ARISING FROM CONSULTATION
Option 57: Develop a comprehensive flood risk reduction policy. This option would see the development of a policy setting out the principles of flood risk management to be embedded into all development proposals.	<ul style="list-style-type: none"> • Strong level of support with policy development seen as vital; • Need for clarification as to how policy would be applied to extensions/refurbishments.

NEW OPTIONS ARISING FOLLOWING COMMUNITY INVOLVEMENT

No additional options have been suggested.

Evidence base:

- Cambridge and Milton Surface Water Management Plan (2011);
- Cambridge and South Cambridgeshire Level 1 Strategic Flood Risk Assessment (2010);
- Cambridgeshire Green Infrastructure Strategy (2011);
- Great Ouse Catchment Flood Management Plan (2010);
- Erosion Risk Management Strategy for England (2011).

How the Policy Came About:

101. Within Cambridge:

- 11,061 properties are currently at risk of pluvial (surface water) flooding¹⁴.
- Estimated economic damages associated with pluvial (surface water) flood risk is up to £1,866,839 (annualised average damages)⁸.
- Current fluvial (river) flood risk - 986 people would be affected by a 1 in 100 year (1%) flood event and 1,745 people for a 1 in 1000 year (0.1%) event.¹⁵
- Future fluvial flood risk (in 2110) - 1,483 people would be affected by a 1 in 100 year event and 2,544 people for a 1 in 1000 year event¹⁶.
- Based on these figures of potential flood risk, the current estimated economic damage from fluvial flood risk is £157,667 (annualised average damages), and in the future (2110) this would rise to £1.7 million (annualised average damages)¹⁷.

102. Cambridge has issues with both surface water (pluvial) and river (fluvial) flood risk throughout Cambridge. The [Surface Water Management Plan for Cambridge \(2011\)](#) shows that the majority of Cambridge is at high risk of surface water flooding. Development, if not undertaken with due consideration of the risk to the development and the existing built environment, will further increase this flood risk.

103. The [Cambridge and South Cambridgeshire Level 1 Strategic Flood Risk Assessment \(2010\)](#) shows that there are areas adjacent to the River Cam and smaller watercourses that are at varying degrees of flood risk. As all surface water drains into the watercourses and the River Cam, due consideration must

¹⁴ Cambridge and Milton Surface Water Management Plan 2011

¹⁵ There are two commonly used ways of expressing how frequently a particular depth or intensity of rainfall occurs. Return period such as 1 in 100 or 1 in 1000 is the average time interval between rainfall events of a given size. 1% or 0.1% is the annual probability of that event happening each year. Numbers from Environment Agency - Great Ouse Catchment Flood Management Plan 2010

¹⁶ Environment Agency (2010), Great Ouse Catchment Flood Management Plan

¹⁷ Annualised annual damages (AAD) is the average damage per year in monetary terms that would occur at each specific address point, within the modelled domain, from flooding over 100 years.

be given to the impact of any new development in Cambridge upon the consequential increase in flood risk downstream.

104. The technical guidance that accompanies the National Planning Policy Framework requires local authorities to seek opportunities for an overall reduction in flood risk in the area and this policy is a way achieving that aim and the Cambridge policy of 'do more to reduce flood risk' from the Great Ouse Catchment Flood Management Plan.
105. Paragraph 100 of the National Planning Policy Framework states that inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk, but where development is necessary, making it safe without increasing flooding elsewhere. Local plans should be supported by Strategic Flood Risk Assessment and develop policies to manage flood risk from all sources. Local plans should apply a sequential, risk-based approach to the location of development to avoid where possible flood risk to people and property and manage any residual risk, taking account of the impacts of climate change. This approach has also been taken as part of the identification of sites for allocation in the Local Plan as part of the work on the Strategic Housing Land Availability Assessment, with the exception test applied where appropriate.
106. Although only one option was put forward for policy development, this has been refined into two parts, one dealing with the potential risk posed by the development and how that risk can be managed in Cambridge and another dealing with the potential risk posed to the development by the existing fluvial and pluvial sources and how that can be managed.
107. There was a strong level of support for this option during the Issues and Options consultation and it is one of the core planning principles in the National Planning Policy Framework (paragraph 17). Cambridge City Council, under the Flood and Water Management Act 2010, are a flood risk authority and must have due regard to flood risk management (which includes the reduction of flood risk) in everything we undertake as that authority, including planning. There is a [National Flood and Coastal Erosion risk Management Strategy for England](#) that also encourages local authorities to manage flood and coastal erosion risks in an appropriate way, taking account of the needs of communities and the environment. The policy contains specific local requirements based on local evidence from the Surface Water Management Plan for Cambridge and Milton (2011) and the Strategic Flood Risk Assessment (2010) and therefore does repeat national policy. It focuses on location, resilience, resistance and appropriate design.
108. The scale and size of developments has been considered when writing the policy to ensure clarity is provided on how it will be applied to extensions and refurbishments as measures that would be appropriate for large developments would not necessarily be appropriate for domestic extensions. The policy also

seeks to clarify acceptable development in the Environment Agency’s flood zone 3 (risk of fluvial flooding up to a 1 in 100 year event).

Findings of the Sustainability Appraisal of the Cambridge Local Plan (July 2013)

109. The Sustainability Appraisal notes that this policy does not allow for development to increase flood risk, and also seeks to improve the baseline situation through infrastructure provisions. Gardens and open spaces should be protected, which will help to protect against flood risk. Measuring against the baseline situation, the appraisal notes that the plan should lead to significant positive effects in terms of climate change and flood risk by ensuring that new development contributes towards reducing flood risk across the city.
110. The appraisal did note that in allowing for discharge into locations that have the capacity to receive them, there is the possibility for such discharges to result in pollution of watercourses. As such, the appraisal recommended that consideration be given to making reference within the policy to the role that SuDS can play in reducing the pollution of watercourses. However, it is considered that Policy 31 is of relevance here, as it sets out the requirements to take a water sensitive design approach to managing water, the use of SuDS being an integral element of this policy. As such, it is not considered to repeat this requirement within Policy 32, as the plan should be read as a whole.

Key Issues raised during Proposed Submission consultation

Policy 32: Flood risk	
Total Representations: 5	
Object: 0	Support: 5
Objections	Not applicable
Support	<ul style="list-style-type: none"> • Anglian Water support the policy which gives a strong message on surface water management and climate change adaptation/mitigation; • The Environment Agency supports the policy following pre-plan consultation involving effective cooperation and progressive developments of the policy. The policy complements the Anglian River Management Plan and River Cam Catchment Flood Management Plan, which seek similar outcomes; • Pleased to see future climate scenarios being taken into account when assessing flood risk.

Minor Modifications suggested following Proposed Submission consultation and implications for Sustainability Appraisal

111. No changes to Policy 32 Flood risk or the supporting text are suggested in the Addendum to the Cambridge Local Plan 2014: Proposed Submission document. There are therefore no impacts on the findings of the Sustainability Appraisal.

Policy 33: Contaminated land

EXISTING POLICY TO BE REPLACED (CAMBRIDGE LOCAL PLAN 2006)	OPTION(S) BEING TAKEN FORWARD FROM THE ISSUES AND OPTIONS REPORT (2012) AND ISSUES AND OPTIONS 2 (2013)	OPTION(S) NOT BEING TAKEN FORWARD FROM THE ISSUES AND OPTIONS REPORT (2012)
4/13 Pollution and Amenity	Option 87 Contaminated land policy	Option 84 General pollution policy

Key issues raised during Issues and Options (2012) and Issues and Options 2 (2013) consultations:

SECTION OF THE ISSUES AND OPTIONS REPORT (2012)	KEY ISSUES ARISING FROM CONSULTATION
Option 84 – General Pollution Policy	<ul style="list-style-type: none"> • General statements in support of a policy option on pollution; • Some comments that one overarching policy dealing with pollution is sufficient; • Other comments in support of detailed policies as well especially as PPS23 and PPS24 have been lost; • One preferred approach would be that a general policy on pollution be supported by SPD Guidance on the individual issues of air quality, noise and contaminated land; • Light pollution is a growing menace; • Noise pollution from air conditioning units is increasing; • Additional recent damage to the health of people living near major roads from extra development needs to be recognised; • ‘External lighting’ should include internal lighting that is visible externally; • This policy needs to extend to residential boats; • This policy should extend to odour issues; • Policy should include protection and enhancement of agricultural and good quality soils.

<p>Option 87: Contaminated land</p>	<ul style="list-style-type: none"> • Strong support for development of this policy; • Alternative approach would be that a general policy on pollution be supported by SPD Guidance on the individual issues of contaminated land, air quality and noise; • The need for more stringent control of radioactive waste around the city was expressed. Concern about emissions from radioactive material in the City was also raised; • Preference was expressed of undertaking remediation in a single phase rather than in a phased manner (When required) in phased developments; • Comment expressed about local residents not being adequately consulted on any possible remediation works in their area; • New development should not give rise to pollution; • This option needs to be amended to assume that all brownfield sites could be adversely affected by contamination and a detailed assessment should be undertaken on each occasion; • This option should include more stringent control of radioactive waste around the city; • Do not build houses on contaminated land. Parkland should be the preferred option.
<p>NEW OPTIONS ARISING FOLLOWING COMMUNITY INVOLVEMENT:</p>	
<p>No additional options have been suggested.</p>	

Evidence base:

- National Planning Policy Framework (2012);
- Cambridge City Council Contaminated Land database and historic maps/aerial photographs.

How the Policy Came About:

112. Policy 33 is the outcome of the consultation on two policy options that were presented during the Issues and Options stage:

- Option 84 – development of an overarching policy, dealing with all forms of pollution
- Option 87- development of a detailed contaminated land policy

113. Land contamination is a material consideration for the purposes of planning. It is important to ensure that proposed developments are situated on land that will be safe and suitable for the proposed use.

114. As part of the [Environmental Protection Act 1990](#) (as amended), the Part II A regime focuses ‘on land which has been contaminated in the past’. The regime

was not introduced in order to address contamination issues arising during the redevelopment of land. This approach is reinforced in the Environmental Protection Act 1990: Part II legislation which states that 'Part IIA is one of the main policy measures used to deal with the historic legacy of contaminated land' and that 'the role of the town and country planning and building control regimes is ensuring that land is made suitable for any new use, as planning permission is given for that new use.'

115. The [Taylor Review](#) (2012) by Lord Taylor identified that there are 'A number of policy areas, mainly from the introduction of the Localism Act and the National Planning Policy Framework, where there are gaps in the present guidance' and concludes that 'Guidance is needed on noise, air, land, water and light pollution, important issues on which Government could set standards in order to ensure appropriate development'. Despite the Taylor Review clearly identifying a gap in the existing guidance for contaminated land, there is currently no clear commitment/indication for the timescale for this gap to be addressed at the national level. It is therefore of great importance that this gap is addressed at a local level through the Local Plan.
116. The adoption of a contaminated land policy at a local level is supported by paragraph 121 of the National Planning Policy Framework, which states that 'Planning policies and decisions should also ensure that:
 - 1) the site is suitable for its new use taking account of ground conditions and land instability and;
 - 2) after remediation, as a minimum, land should not be capable of being determined as contaminated land under Part IIA of the Environmental Protection Act 1990'.
117. This approach is also reinforced by the Environmental Protection Act 1990 which states that 'Land contamination, or the possibility of it, is a material consideration for the purposes of town and county planning. This means that a planning authority has to consider the potential impacts of contamination both when it is developing plans and when it is considering individual applications for planning permission'.
118. The Interim Sustainability Appraisal has also recognised that the adoption of this policy can ensure that new developments are appropriate; given potential sensitivities to adverse effects from pollution, and also that the site is suitable for its new use. Strong support was also expressed in the representations for a policy that would 'prevent new developments from contributing to pollution', which is an integral part of the National Planning Policy Framework.
119. As such one option for the new local plan would be to develop a detailed policy dealing with contamination, incorporating key elements of guidance previously contained in Planning Policy Statement 23. The policy could be, if need be,

supported by a Supplementary Planning Document, which could set out some of the finer detail to help provide certainty for developers.

120. During the consultation, one respondent felt that a general policy on pollution matters would be sufficient with further specific guidance contained in a Supplementary Planning Document. While a single policy would be a simpler approach, the National Planning Policy Framework is clear the Supplementary Planning Documents should only be used where they can help applicants make successful applications or aid infrastructure delivery. They should not be used to add unnecessarily to the financial burdens on development, and given that measures to remediate and mitigate pollution matters will have a financial implication for developments, these matters should be dealt with through policy.
121. The principles set out in the National Planning Policy Framework, paragraphs 109-111, 120 and 121, demonstrate why contaminated land is important and what criteria the new developments should meet with respect to land pollution. The implementation of the policy presented above will build further on the principles of the National Planning Policy Framework by providing guidance on how these principles will be met, reference to technical material and acceptable practises will be included. This approach is supported by the National Planning Policy Framework in paragraph 8, which states that 'the planning system should play an active role in guiding development to sustainable solutions'. Ultimately, this policy will enable owners, land developers and any other interested parties to demonstrate how a development is 'suitable for its new use' and have 'minimised impact to the local environment', which lie at the heart of the National Planning Policy Framework.

Procedure for dealing with Contaminated Land

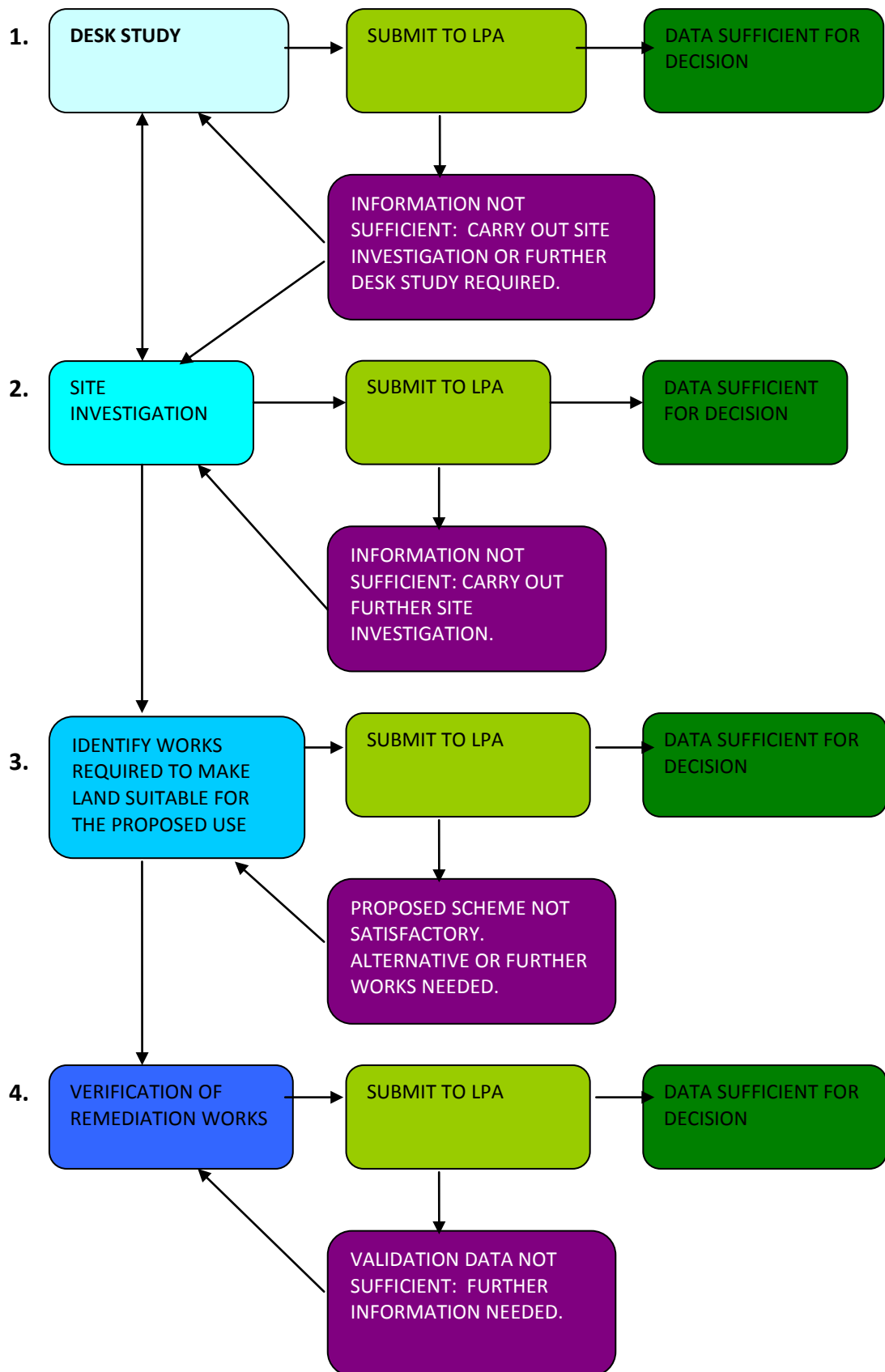
122. The criteria for requiring a Contaminated Land Assessment are set out in the Developers' Guide. All applications should be in line with the latest nationally accepted guidance available at the time of application. This and further detailed information is available in the Cambridge City Council [Developers' Guide to Contaminated Land](#).
123. Figure B summarises the four main phases that may be necessary to ensure that a site is suitable for use. Depending on the results of each phase it may not be necessary for all phases to be completed.

Findings of the Sustainability Appraisal of the Cambridge Local Plan (July 2013)

124. The Sustainability Appraisal notes that Policy 33 is likely to have positive effects on the community and wellbeing theme as it focuses on ensuring that

contaminated land does not result in adverse health impacts. No negative impacts of this policy were found.

Figure B: Summary of the procedure for considering land contamination



Key Issues raised during Proposed Submission Consultation

Policy 33: Contaminated land	
Total Representations: 5	
Object: 5	Support: 0
Objections	<ul style="list-style-type: none"> • Where contamination is suspected an assessment MUST be undertaken, not SHOULD; • Development on brownfield/contaminated sites will meet the objectives of Policy 3 as it makes best use of previously developed land. Suggest the final sentence of the policy be amended to say “Proposals for sensitive developments on existing or former industrial areas will be favoured...” not just permitted; • The Environment Agency suggests that the policy needs strengthening to protect groundwater given the importance and vulnerability of aquifers in and around Cambridge. Source protection zones need covering to make the policy effective; • General support for the policy but it is missing reference to the consideration of the financial implications of the need to remediate previously developed land and suggest that the policy be reworded to make reference to this; • Policy is contrary to the NPPF and is not a planning matter as it is dealt with by other pollution control regimes.
Support	Not applicable

Minor modifications suggested following Proposed Submission consultation and implications for Sustainability Appraisal

125. As a result of assessment, two minor modifications are suggested for Policy 33 Contaminated Land and paragraphs 4.40 – 4.44 of the supporting text. These changes are in the Addendum to the Cambridge Local Plan 2014: Proposed Submission document marked as PM/4/009 and PM/4/010.

126. Both of these modifications are in response to a representation made by the Environment Agency (representation number 27606). While supportive of the general thrust of the policy and its supporting text, it was felt by the Agency that both needed to be strengthened in their approach to protection of controlled waters, groundwater and gas migration from contaminated land in order that they better reflect the requirements of the National Planning Policy Framework. Working closely with the Environment Agency, both the policy and supporting text has been amended to include more protection in relation to these issues as follows:

“Development will be permitted where the applicant can demonstrate that:

- a. there will be no adverse health impacts to future occupiers from ground contamination resulting from existing/previous uses of the area; ~~and~~
- b. there will be no adverse impacts, ~~from ground contamination,~~ to the surrounding occupiers, controlled waters and the environment from suspected/identified ground contamination , caused by the development; ~~and~~
- c. there will be no impact to future and surrounding occupiers from on-site and off-site gas migration.

Where contamination is suspected or known to exist, an assessment should be undertaken to identify existing/former uses in the area that could have resulted in ground contamination; and if necessary:

- d. design and undertake an intrusive investigation to identify the risks of ground contamination, including groundwater and ground gases; and if ~~necessary~~ proven there is a risk
- e. submit a remediation strategy and/or adopt and implement mitigation measures, to ensure a safe development and ensure that the site is stable and suitable to the new use in accordance with the National Planning Policy Framework;
- f. ensure that there are no adverse health impacts to future/surrounding occupiers and groundwater impacts and ~~which minimise impact that there is no deterioration~~ of the environment.

Proposals for sensitive developments on existing or former industrial areas will be permitted where it is demonstrated that the identified contamination is capable of being suitably remediated for the proposed end use.

127. In response to the Environment Agency’s representation, it is suggested that paragraph 4.40 be deleted and paragraph 4.41 be amended to read:

~~“4.40 The growth of rail infrastructure and an expanding population in the 1800s in Cambridge led to chalk quarrying, clay extraction, engineering and energy provision, through town gas production, during the industrial age. The last century has also seen considerable landfilling of voids left by clay and chalk marl extraction, electronics manufacturing and engineering.~~

Pollution can arise from ~~any of the activities presented above and many other sources~~ a number of activities and sources. Land and groundwater can present a potential source of pollution if they have been contaminated by previous land uses. Groundwater is the primary source of potable supply to Cambridge and also provides flow to watercourses used for irrigation, public supply and industry.”

128. It is also suggested, in response to the Environment Agency’s representation, that paragraph 4.42 – 4.44 be amended as follows:

“Land contamination is a material consideration for the purposes of planning. It

is important to ensure that proposed developments are situated on land that will be safe and suitable for the proposed use and will not cause pollution elsewhere. There will be situations where remediation works will be required to make land safe prior to being developed; for example, if a site's previous use was a petrol station, there will be a need to ensure that no residual fuel is left on-site in storage tanks or in the soil itself as it may cause a health hazard for future users, underlying aquifers and their abstractors. In some instances, the level and type of contamination may make land unsuitable for certain types of development; for example, recently closed landfill sites are considered to be unsuitable for residential development. Gas monitoring, including a gas risk assessment and protective measures, if necessary, will be required for sites within the 250m buffer zone of a former landfill site."

On a precautionary basis, the possibility of contamination should be assumed when considering both development plans and individual planning applications in relation to all land subject to or adjacent to previous industrial use and also where uses are being considered that are particularly sensitive to contamination. Initial assessment will be needed to identify the land and groundwater sensitivity of a site to pollution. It will need to be shown that the development is appropriate for its location. Conditions shall be applied to planning permissions to secure appropriate pollution prevention or mitigation measures where required. In major developments, it will also be required to demonstrate sustainable forms of managing contaminated land (mitigation measures), which reduce the need to landfill and minimise the impacts on climate change.

In the context of this policy, examples of sensitive developments include housing, schools, hospitals and children's playing areas. The Department of the Environment Industry Profiles, available for download from the Environment Agency website, provide details on the processes and substances associated with common industrial uses. For guidance on the principles and practice for groundwater protection the interested parties should refer to the Environment Agency website (currently GP03:2012 or any document which supersedes it)."

129. Following consideration of the impact of these changes on the Sustainability Appraisal Framework, it has been concluded that these changes do not materially alter the findings of the Sustainability Appraisal, which already recognises the positive effects of this policy.

Policy 34: Light pollution control

EXISTING POLICY TO BE REPLACED (CAMBRIDGE LOCAL PLAN 2006)	OPTION(S) BEING TAKEN FORWARD FROM THE ISSUES AND OPTIONS REPORT (2012) AND ISSUES AND OPTIONS 2 (2013)	OPTION(S) NOT BEING TAKEN FORWARD FROM THE ISSUES AND OPTIONS REPORT (2012)
4/15 Lighting	Option 88 Light pollution policy	Option 84: General pollution policy

Key issues raised during Issues and Options (2012) and Issues and Options 2 (2013) consultations:

SECTION OF THE ISSUES AND OPTIONS REPORT (2012)	KEY ISSUES ARISING FROM CONSULTATION
Option 88 - Light Pollution	<ul style="list-style-type: none"> • The requirement for a need assessment, site survey and modelled levels of light spill should not be required for all types of development as this would be unnecessarily onerous and costly for small developments. The requirement should only apply to major development, development with floodlighting or in countryside locations; • Concerns with protection of the night sky: Street lights should go off at 2am; • New lighting should be low energy; • All cycle routes in urban areas should be lit with normal street lighting; • The policy should give consideration to energy saving, impact on biodiversity but also public safety and crime prevention; • Concerns with the protection of amenity: 'External lighting' should include internal lighting that is visible externally (stairwells); • Concerns with safety and crime prevention • Particularly important in the western part of the city, because of the impact on observatories; • A preferred approach would be to include a general policy on pollution matters with guidance on individual issues within SPD guidance; • There should be an additional requirement for an ecological assessment of the impact of any proposed lighting scheme; • Policy should take account of heritage street lighting and the lighting character of an area;

	<ul style="list-style-type: none"> • Need for retrospective action • Support a policy that protects wildlife and wild spaces like Stourbridge Common and Ditton Lane • Important when considering location of sports facilities • Need to design lighting to be effective with minimal spillage as well as being attractive • The levels of street lighting is already minimal; • There should be an additional requirement for an ecological assessment of the impact of any proposed lighting scheme.
<p>NEW OPTIONS ARISING FOLLOWING COMMUNITY INVOLVEMENT:</p>	
<p>An alternative option would be to include a general policy on pollution matters with guidance on individual issues within SPD guidance.</p>	

Evidence base:

- National Planning Policy Framework (2012);
- Cambridge City Council (2007). Sustainable Design and Construction SPD

How the Policy Came About:

130. Paragraph 125 of the National Planning Policy Framework specifically mentions that planning policies and decisions should aim to “limit the impact of light pollution from artificial light on local amenity, intrinsically dark landscapes and nature conservation.” Although light has now been brought into the Statutory Nuisance provisions of the Environmental Protection Act 1990, this does not protect to the same standard as detriment to the amenity and neither does it extend to protecting intrinsically dark areas or wildlife. As the aim of the planning system is protection of the amenity, intrinsically dark area and wild life the nuisance powers given to Local Authorities cannot therefore be accepted as a suitable alternative and hence a planning policy on light is required.
131. A needs assessment, site survey and modelled levels of light spill will be required for major development, development with floodlighting or in countryside/edge of city locations as these forms of development could contribute significantly to light pollution. Ecological assessment of the development site may be needed in some instances, where there are species, which are particularly sensitive to light. For developments that include cycle routes over private land, the standard of lighting will be expected to be commensurate with lighting on the public highway, where appropriate. Lighting to cycle routes on the highway is regulated by the Highways Authority, Cambridgeshire County Council.
132. Whilst respondents to the Issues and Options consultation suggested that a single general policy represented a simpler approach to dealing with all forms of pollution including light, it would not have sufficient detail to address the full

range of issues pertaining to light pollution. The use of a range of different policies which clearly set out the requirements expected of developers would allow greater certainty through the development process. This could impact positively on the cost of development and the likelihood of development coming forward.

Findings of the Sustainability Appraisal of the Cambridge Local Plan (July 2013)

133. The Sustainability Appraisal noted that Policy 34 should have a number of positive impacts, across a range of sustainability themes. In relation to community and wellbeing, this policy has implications for crime, stating that proposals that incorporate new external lighting, or changes to existing external lighting, should utilise the bare minimum required; balancing concerns over public safety, crime and residential amenity (in terms of light pollution). This balancing of considerations is likely to result in positive effects. The positive impacts of the criteria within the policy related to the impacts of external lighting on biodiversity are also noted, as are the positive impacts on landscape, townscape and cultural heritage objectives.

Key Issues raised during Proposed Submission consultation

Policy 34: Light pollution control	
Total Representations: 6	
Object: 2	
Support: 4	
Objections	<ul style="list-style-type: none"> • Make reference to minimising impact on heritage features and their setting as well as Green Belt and green spaces; • Re: light spillage, some concerns as to the use of ‘minimise’ instead of ‘minimum’; • Should make specific reference to the need to light cycle routes, albeit sensitively.
Support	<ul style="list-style-type: none"> • Welcome references to impact on the setting of the city (floodlighting being a particular issue on the edge of the city).

Minor Modifications suggested following Proposed Submission consultation and implications for Sustainability Appraisal

134. No changes to Policy 34 light pollution control or the supporting text are suggested in the Addendum to the Cambridge Local Plan 2014: Proposed Submission document. These are therefore no impacts on the findings of the Sustainability Appraisal.

Policy 35: Protection of human health from noise and vibration

EXISTING POLICY TO BE REPLACED (CAMBRIDGE LOCAL PLAN 2006)	OPTION(S) BEING TAKEN FORWARD FROM THE ISSUES AND OPTIONS REPORT (2012) AND ISSUES AND OPTIONS 2 (2013)	OPTION(S) NOT BEING TAKEN FORWARD FROM THE ISSUES AND OPTIONS REPORT (2012)
4/13 Pollution and Amenity	Option 86 Noise	Option 84: General pollution policy

Key issues raised during Issues and Options (2012) and Issues and Options 2 (2013) consultations:

SECTION OF THE ISSUES AND OPTIONS REPORT (2012)	KEY ISSUES ARISING FROM CONSULTATION
Option 86 - Noise Policy	<ul style="list-style-type: none"> • Several general statements of support for a noise pollution policy; • Several mentions of noise pollution caused by the airport including the suggestion that a separate mention should be made of aviation noise; • Several mentions made of traffic generated noise including that noise reduction measures should include reduction from existing sources of noise (e.g. traffic from the M11); • The A14 upgrade would surely have a detrimental effect on noise; • Several concerns over existing noise sources, such as industrial, small plant, licensed premises including rock festivals and vehicle noise. Suggestion that Policy should look at existing industrial sources of noise; • Sound insulation needs to be improved in modern properties
NEW OPTIONS ARISING FOLLOWING COMMUNITY INVOLVEMENT	
No additional options have been suggested.	

Evidence base:

- National Planning Policy Framework (2012)

How the Policy Came About:

135. The National Planning Policy Framework states at paragraph 6 that the purpose of the planning system is to “contribute to the achievement of sustainable development.” It goes on to describe an environmental role as one of the three

dimensions to sustainable development and highlights that minimising pollution is an important part of this role. Paragraph 17 lists the core planning principles. These include that planning should “always seek to secure high quality design and a good standard of amenity for all existing and future occupiers of land and buildings.” Thus leading to better places for people to live. Paragraph 109, in relation to conserving and enhancing the natural environment, explains that the planning system should prevent “both new and existing development from contributing to, or being put at, unacceptable risk from, or being adversely affected by unacceptable levels of soil, air, water or noise pollution.” Paragraph 123, then goes on to describe four main aims for planning policies concerning noise. There is a strong message throughout the National Planning Policy Framework that noise is an important factor in the quality of life, health and well-being and so is a key aspect of sustainable development supporting the need for a planning policy.

136. The [Taylor Review](#) of Government Planning Practice Guidance which was undertaken in 2012, following the introduction of the National Planning Policy Framework, recommends that new planning guidance be provided for several pollution topics including noise as “important issues on which Government could set standards in order to ensure appropriate development.” It is therefore important that a noise planning policy is produced to enable the planning authority and developers to achieve the aims of the National Planning Policy Framework both in the interim and when this guidance is available.
137. With regard to alternative legislative controls, ‘detriment to the amenity’ is a much lower level of effect than that required to establish a statutory noise nuisance under the Environmental Protection Act 1990. As such the ‘statutory nuisance’ powers provide a lower level of protection. In addition, the nuisance powers are limited to noise from premises and cannot therefore be used to protect residents from traffic or aviation noise for example. As the aim of the planning system is protection of the amenity the nuisance powers given to Local Authorities cannot therefore be accepted as a suitable alternative and hence a planning policy on noise is required.
138. There were several respondents to the Issues and Options Report consultation who were concerned over aircraft and traffic noise as well as noise from existing development. The impact of aircraft and traffic noise cannot be dealt with by other legislative controls such as the Environmental Protection Act. It is therefore necessary for future development to be controlled and protected via the planning process. The planning process cannot deal with noise from existing developments retrospectively, this is controlled under the nuisance powers of the Environmental Protection Act 1990 which does not afford the same level of protection of amenity, thus supporting the need for a planning policy on noise to ensure future developments accord with the requirement of the National Planning Policy Framework. Whilst specific reference can be made to aircraft noise in the policy on noise pollution, the policy option on Cambridge Airport - Aviation Development contained within the Issues and

Options Report (Option 198) also made reference to the need to maintain the amenity of residents.

139. In relation to road traffic noise, this is primarily the responsibility of the Highways Agency. Although the A14 is not within the city boundary, the Highways Agency will consult with the Council and any increase in noise and proposed mitigation measures affecting residents will be taken into consideration during the planning process.
140. The Local Plan and policies can only deal with proposed future development and licensing issues have to be dealt with under the relevant licensing regime. Noise issues from existing sites are controlled by the statutory nuisance procedures under the Environmental Protection Act 1990. The Local Plan and policies cannot deal with this retrospectively. In relation to music festivals, this type of event is regulated via the Licensing Regime and the statutory nuisance provisions of the Environmental Protection Act.

Findings of the Sustainability Appraisal of the Cambridge Local Plan (July 2013)

141. For the most part the Sustainability Appraisal noted that Policy 35 was likely to have positive impacts on the sustainability objectives related to community and wellbeing. The appraisal did, however consider that an opportunity had been missed within the policy to highlight the impacts that excess noise and vibration can have on wildlife in addition to human health. However, no change to the draft local plan has been proposed as other policies within the plan (policies 69 and 70) seek to protect both sites of local nature conservation importance and priority species and habitats from the impacts of development, including disturbance. Given that the plan should be read as a whole, it was not considered necessary to amend the policy.

Key Issues raised during Proposed Submission consultation

Policy 35: Protection of human health from noise and vibration	
Total Representations: 5	
Object: 2	Support: 3
Objections	<ul style="list-style-type: none"> The policy as written only protects noise sources from being subjected to residences and not vice versa. The plan should be amended; Policy is contrary to the NPPF and is not a planning matter as it is dealt with by other pollution control regimes.
Support	<ul style="list-style-type: none"> Full support for the policy in particular reference to adequate noise mitigation measures as part of the development package; The Environment Agency supports the policy’s recognition of the need to protect new residents from existing sources of noise and

	the protection of existing businesses from unreasonable permitting constraints.
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Minor Modifications suggested following Proposed Submission consultation and implications for Sustainability Appraisal

142. As a result of assessment, one minor modification is suggested to Table 4.2 in the supporting text of Policy 35 Protection of human health from noise and vibration. This change is in the Addendum to the Cambridge Local Plan 2014: Proposed Submission document marked as PM/4/011.
143. This change is proposed to correct a drafting error in Table 4.2: Noise exposure categories. Under rail traffic, 07.001 should read 07.00¹.
144. Following consideration of the impact of this change on the Sustainability Appraisal Framework, it has been concluded that this change does not materially alter the findings of the Sustainability Appraisal.

Policy 36: Air quality, odour and dust

EXISTING POLICY TO BE REPLACED (CAMBRIDGE LOCAL PLAN 2006)	OPTION(S) BEING TAKEN FORWARD FROM THE ISSUES AND OPTIONS REPORT (2012) AND ISSUES AND OPTIONS 2 (2013)	OPTION(S) NOT BEING TAKEN FORWARD FROM THE ISSUES AND OPTIONS REPORT (2012)
4/14 Air Quality Management Areas	Option 85 Air Quality Policy	Option 84: General pollution policy

Key issues raised during Issues and Options (2012) and Issues and Options 2 (2013) consultations:

SECTION OF THE ISSUES AND OPTIONS REPORT (2012)	KEY ISSUES ARISING FROM CONSULTATION
Option 85 – Air Quality Policy	<ul style="list-style-type: none"> • Alternative approach would be that a general policy on pollution be supported by SPD Guidance on the individual issues of air quality, noise and contaminated land; • Concerns raised over deterioration of air quality resulting from congestion, better planning of road layouts and junctions would be beneficial; • Concerns raised over damage to health of those residents living near major roads; • Concerns raised over current air quality.

NEW OPTIONS ARISING FOLLOWING COMMUNITY INVOLVEMENT:

No additional options have been suggested.
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Evidence base:

- National Planning Policy Framework (2012);
- Cambridge City Council Air Quality in Cambridge. Developers Guide (2008);
- Data from air quality monitoring points across the city.

How the Policy Came About:

145. The Local Plan will seek to ensure that Cambridge develops in the most sustainable way possible. This means delivering our social and economic aspirations with compromising the environmental limits of Cambridge for current and future generations, as well as protecting the amenity for residents, workers and visitors in Cambridge. It will be important to ensure that new development proposals do not lead to an adverse effect on human health and amenity or a worsening of air quality, both in the Air Quality Management Area and the city as a whole. The primary local impacts on air quality in Cambridge are from road transport, with a contribution from domestic, commercial and industrial heating sources. Given the current Air Quality Management Area and the forecast growth of Cambridge, the development management process – specifically using local planning policy – is a key tool in protecting and enhancing Air Quality. Indeed, it is a specified statutory process for achieving and maintaining air quality objectives where needed.
146. Air pollution in parts of Cambridge currently breaches EU limit values for Nitrogen Dioxide (NO₂). The City Council has a statutory duty to reduce relevant pollutant levels and plan to meet the EU Limit values through the Air Quality Action Plan. The Joint Air Quality Action Plan (with Huntingdonshire and South Cambridgeshire District Councils and Cambridgeshire County Council) in 2009 incorporates measures for improvement of and protection from poor air quality using the development management system.
147. There is a strong message throughout the National Planning Policy Framework that air quality is an important factor in the quality of life, health and well-being and so is a key aspect of sustainable development supporting the need for a planning policy. Planning Policies are specifically mentioned. The Taylor review of Government Planning Practice Guidance which was undertaken in 2012, following the introduction of the National Planning Policy Framework, recommends that new planning guidance is needed for several pollution topics including air quality as “important issues on which Government could set standards in order to ensure appropriate development.” It is therefore important that an air quality planning policy is produced to provide sufficient detail to enable the planning authority and developers to achieve the quality of life and protection of human health aims enshrined in the National Planning Policy Framework both in the interim and when this guidance is available. It is

clear from the responses that air quality issues are of concern; specific issues raised will be made more explicit in the forthcoming Submission Draft Local Plan.

148. Policy 36 (Air Quality, Odour and Dust) will require that the health and amenity impacts of new developments on current and future residents can be addressed. A detailed and specific Air Quality Policy will explicitly provide future protection from poor air quality. This approach is strongly supported by the consultation responses. The policy will provide the key local approaches to reduce ambient levels of atmospheric pollutants, to minimise long-term health risk to new and existing residents from poor air quality, to minimise adverse effects of transport, domestic and industrial emissions on people and the environment and to promote a safe and healthy environment, minimising the impacts of development upon the environment. Without local policy, there will be no clear direction for developers, leading to uncertainty and inconsistency in the development management process and an increase in planning appeals. It will be difficult to carry on with the measures in the Air Quality Action Plan. With a local policy, there will be continuity of air quality regulation and ongoing compliance with the measures in the statutory Air Quality Action Plan (local authorities are required to demonstrate that they are working towards improvements in air quality to avoid the threat of judicial review; further, there will be local legitimacy and certainty within the local policy and most importantly, there will be no deterioration in air quality and an improvement in air quality in the long term.

Findings of the Sustainability Appraisal of the Cambridge Local Plan (July 2013)

149. The Sustainability Appraisal noted that Policy 36 was likely to result in significant positive effects in terms of health and wellbeing given the poor air quality to be found in some areas of the city and the focus on the policy on ensuring that development does not lead to significant adverse effects on air quality. This policy was considered to have significant positive effects in the city centre, which is within the city’s Air Quality Management Area (AQMA). Further development in the city centre has the potential of impacting on air quality, but the provisions contained within Policy 36 should prevent such impacts.

Key Issues raised during Proposed Submission consultation

Policy 36: Air Quality, Odour and Dust	
Total Representations: 7	
Object: 4	Support: 3
Objections	<ul style="list-style-type: none"> • Policy is contrary to the NPPF and is not a planning matter as it is dealt with by other pollution control regimes; • Policy does not sufficiently deal with bus emissions and should

	<p>include specific references to buses that meet European Emissions Level 5 or 6, the introduction of a bye-law requiring buses to switch off their engines and closure of the Drummer Street bus station;</p> <ul style="list-style-type: none"> • It is unreasonable to expect developments to demonstrate that there is absolutely no adverse impact on air quality in air quality management areas. The wording of criterion (c) is unduly onerous and not in conformity with the NPPF. Wording should be amended to read “demonstrate that there is no significant adverse effect on air quality in the air quality management area (AQMA)”; • The Environment Agency supports the majority of the policy but need to ensure that existing businesses and related employment uses are not compromised by placing new residents too close. Perhaps raises the need for use of temporary permissions. Suggest criterion (h) be amended.
Support	<ul style="list-style-type: none"> • Policy is vital to prevent further deterioration in air quality; • Full support from Anglian Water.

Minor Modifications suggested following Proposed Submission consultation and implications for Sustainability Appraisal

150. As a result of assessment, three minor modifications are suggested for Policy 36 Air Quality, Odour and Dust. These changes are in the Addendum to the Cambridge Local Plan 2014: Proposed Submission document marked as PM/4/012, PM/4/013 and PM/4/014.

151. Proposed modification PM/4/012 seeks to amend that wording of the sentence between criteria b and c to provide clarity, while proposed modification PM/4/013 is suggested due to a drafting error in the Proposed Submission Draft Plan. The proposed changes are as follows:

~~“Specifically applicants, where reasonable and proportionate, a~~ According to the end-use and nature of the area and application, applicants must demonstrate that:

c. there is no adverse ~~effect~~ effect on air quality in an air quality management area(AQMA);”

152. Proposed modification PM/4/014 is in response to a representation from the Environment Agency (representation number 27636) who considered that the policy needed to be strengthened to ensure that existing businesses and employment uses are not compromised by placing sensitive developments too close and to make it clear who will be responsible for mitigating any risks. As such, additional wording has been suggested to clarify that it is the

responsibility of the developer to mitigate any risks and to monitor outcomes, as follows:

“h. any impacts on the proposed use from existing poor quality, odour and emissions are appropriately monitored and mitigated by the developer”

Policy 37: Cambridge Airport Public Safety Zone and Air Safeguarding Zones

EXISTING POLICY TO BE REPLACED (CAMBRIDGE LOCAL PLAN 2006)	OPTION(S) BEING TAKEN FORWARD FROM THE ISSUES AND OPTIONS REPORT (2012) AND ISSUES AND OPTIONS 2 (2013)	OPTION(S) NOT BEING TAKEN FORWARD FROM THE ISSUES AND OPTIONS REPORT (2012)
8/13 Cambridge Airport Public Safety Zone	Option 75 – Cambridge Airport Public Safety Zone and Safeguarding Zones	Not applicable

Key issues raised during Issues and Options (2012) and Issues and Options 2 (2013) consultations:

SECTION OF THE ISSUES AND OPTIONS REPORT (2012)	KEY ISSUES ARISING FROM CONSULTATION
Option 75: Cambridge Airport Public Safety Zone and Safeguarding Zones	<ul style="list-style-type: none"> • The air navigation orders must already deal adequately with this part of the city; • Government advice requires an appropriate policy regarding the public safety zone; • This policy is unnecessary, a number of buildings that exceed the safety zone restriction have been built in the city in recent years; • The policy is needed, there is a strong likelihood that air traffic at the airport will increase over the plan period.
NEW OPTIONS ARISING FOLLOWING COMMUNITY INVOLVEMENT:	
No new options were suggested during consultation.	

Evidence base:

- DfT Circular 01/2010. Control of development in Airport Public Safety Zones.

How the Policy Came About:

153. Airport Public Safety Zones and Air Safeguarding Zones are both the subject of specific Government circulars (Department for Transport Circular 01/2010 Control of development in Airport Public Safety Zones and Circular 01/03

Safeguarding Aerodromes, Technical Sites and Military Explosives Storage Areas). In addition, paragraph 44 of the National Planning Policy Framework makes reference to the need to ensure that telecommunications equipment does not cause significant and irreparable interference with air traffic services. Option 75 of the Issues and Options report (2012) sets out the need to consider the impact of development in Air Safety Zones and Air Safeguarding Zones.

Airport Public Safety Zones

154. Public Safety Zones are areas of land at the ends of airport runways within which development is restricted in order to control the number of people on the ground at risk of death or injury in the event of an aircraft accident on take-off or landing. Public Safety Zones are worked out from studies of aircraft accidents to assess the risk to people on the ground around airports and is correlated with the level of air traffic experienced by the airport. The area of the Public Safety Zone therefore corresponds to the 1 in 100,000 individual risk calculated for the airport.
155. The risk assessment underpinning the design of Public Safety Zones takes account of the normal direction that aircraft land and take off at an airport. The statistical risk assessment is specific to each airport's unique set of operations. Whilst aircraft follow a number of routes surrounding an airport, it is statistically more likely for an airport-related aircraft incident to occur on landing rather than on take-off. In the UK, the majority of airports use long, straight, arrival routes that follow the extended runway centreline for some distance to guide aircraft to the airport runway; therefore statistically, there is more likelihood that any incident, should it occur, would happen along these straight approach routes instead of the often curved departure routes. As a result, Public Safety Zones tend to extend away from the runway in a triangular shape, tapering to a point that usually lies on the extended runway centreline. The direction in which a runway is built and used is largely determined by the prevailing wind direction as aircraft normally land and take off into the wind. It is not unusual for a Public Safety Zone at one end of a runway to be generally a little larger than the Public Safety Zone at the other end.
156. The Government declared a Public Safety Zone at Cambridge Airport in 2002, following a period of consultation with the local authorities that began in 1999. In Cambridge and South Cambridgeshire, the Public Safety Zone comprises a narrow triangle of land extending approximately 1,300 metres (0.8 miles) from each end of the runway. The Public Safety Zone is reviewed intermittently by the Department for Transport and the Civil Aviation Authority in liaison with the airport's owners, who are responsible for providing current data and projections on air traffic for the airport.
157. Policy 8/13 Cambridge Airport Public Safety Zone within the Cambridge Local Plan 2006 currently refers to the Public Safety Zone shown on the Proposals

Map (October 2009) as a cone (with a corresponding cone in South Cambridgeshire). The policy in the 2006 Local Plan on the Public Safety Zone was aligned to Department for Transport Circular 1/2002, which was then replaced by the Department for Transport Circular 01/2010.

158. The council must take the Public Safety Zone into account when taking decisions about planning applications. The Government advises there should be a general presumption against new or replacement development, or changes of use of existing buildings, within Public Safety Zones. However, there are exceptions including some extensions and changes of use and new or replacement development involving a low density of people living or working there. The council consults Cambridge Airport and the Ministry of Defence on any planning applications, which fall within the Public Safety Zone. It remains necessary to indicate the extent of the Public Safety Zone on the Proposals Map, with a corresponding policy within the Local Plan.

Air Safeguarding Zones

159. In addition to the Cambridge Airport Public Safety Zone extending from the airport runway to Radegund Road, there are five Air Safeguarding Zones, which radiate out from the airport and potentially restrict the height of new buildings in Cambridge to varying extents (from all structures through to any structure greater than 90 metres above ground level). These Air Safeguarding Zones are currently mentioned in paragraph 8.33 of the supporting text to the policy in the Cambridge Local Plan 2006.
160. Airports with Air Safeguarding Zones are normally set out in the Department for Transport Circular 01/03 Safeguarding Aerodromes, Technical Sites and Military Explosives Storage Areas. Whilst Cambridge Airport is not covered by the requirements of this circular, all military airfields are also statutorily safeguarded. As Cambridge Airport is a contractor for the Ministry of Defence, it is subject to statutory safeguarding. This safeguarding order was confirmed by letter dated 23 July 2003 from the Office of the Deputy Prime Minister to a number of local authorities in Cambridgeshire, Essex, Suffolk, Hertfordshire and Bedfordshire.
161. Marshall has provided up to date information on necessary height constraints to the council and this is mapped by the council as a constraint layer for use in relation to planning applications. The map titled Airport Safeguarding Zones Heights for Referral indicates the areas where restriction on building heights may be required in order to allow the airport to continue to operate safely. This map is included within Section 4 of the draft Cambridge Local Plan 2014 and will be included within the Local Plan. The map is also provided on the council's website (under Constraints on applications). In the light of the data held by the council on height restrictions, Marshall and the Ministry of Defence are consulted on planning applications as a matter of course. In the event of

their objection to any planning application, this is taken into account in decision-making.

162. Ongoing safeguarding of the airport can be achieved by assessing proposed developments within the Air Safeguarding Zones to ensure that there is:

- Protection of the blocks of air through which aircraft fly;
- Protection of radar and other electronic aids to aircraft navigation, by preventing reflection and diffraction of radio signals;
- Protection of approach and runway lighting, by preventing them from being obscured. Other lighting may need consideration in order to ensure that it is not mistaken for approach or runway lighting;
- Avoidance of any increase in the risk of birdstrike.

Findings of the Sustainability Appraisal of the Cambridge Local Plan (July 2013)

163. No adverse impacts from this Policy on the sustainability objectives were predicted as part of the Sustainability Appraisal process.

Key Issues raised during Proposed Submission consultation

Policy 37: Cambridge Airport Public Safety Zone and Air Safeguarding Zones	
Total Representations: 2	
Object: 1	Support: 1
Objections	<ul style="list-style-type: none"> • Concern that some developments have already breached the requirements of this policy.
Support	<ul style="list-style-type: none"> • Policy provides appropriate protection for the Public Safety Zones as well as safeguarding zones with appropriate consultation.

Minor Modifications suggested following Proposed Submission consultation and implications for Sustainability Appraisal

164. No changes to Policy 37 Cambridge Airport Public Safety Zone and Air Safeguarding Zones or the supporting text are suggested in the Addendum to the Cambridge Local Plan 2014: Proposed Submission document. There are therefore no impacts on the findings of the Sustainability Appraisal.

Policy 38: Hazardous installations

EXISTING POLICY TO BE REPLACED (CAMBRIDGE LOCAL PLAN 2006)	OPTION(S) BEING TAKEN FORWARD FROM THE ISSUES AND OPTIONS REPORT (2012) AND ISSUES AND OPTIONS 2 (2013)	OPTION(S) NOT BEING TAKEN FORWARD FROM THE ISSUES AND OPTIONS REPORT (2012)
Not applicable	Not applicable	Not applicable

Key issues raised during Issues and Options (2012) and Issues and Options 2 (2013) consultations:

Not applicable (policy arose following consultation on the Issues and Options Report (2012)).

Evidence base:

- Control of Major Accident Hazard Regulations 1999 (COMAH);
- Department of Communities and Local Government Circular 04/00: Planning Controls for Hazardous Substances;
- Buncefield Investigation: Final Report of the Major Incident Investigation Board (2008).

How the Policy Came About:

165. European Union law in the Seveso II Directive (96/82/EC) requires that the objectives of preventing major accidents and limiting the consequences of such accidents are taken into account in land-use planning policies. These policies should consider three key scenarios:

- The siting of new establishments;
- Modifications to new establishments; and
- New developments within the vicinity of existing establishments and the increased risk of a major accident.

The Directive is implemented in the United Kingdom through the Control of Major Accident Hazard Regulations 1999 (COMAH).

166. Department of Communities and Local Government Circular 04/00: Planning Controls for Hazardous Substances (Paragraph 9) states that:

“The hazardous substances consent controls are designed to regulate the presence of hazardous substances so that they cannot be kept or used above specified quantities until the responsible authorities have had the opportunity to assess the risk of an accident and its consequences for people in the surrounding area and for the environment. They complement, but do not

override or duplicate, the requirements of the Health and Safety at Work etc Act 1974 and its relevant statutory provisions (defined at Section 53 of that Act) which are enforced by the Health and Safety Executive. Even after all reasonably practicable measures have been taken to ensure compliance with the requirements of the 1974 Act, there will remain a residual risk of an accident which cannot entirely be eliminated. These controls ensure that this residual risk to persons in the surrounding area and to the environment is properly addressed by the land use planning system.”

167. In response to the Buncefield incident in December 2005, where a series of large explosions and fires occurred at the Buncefield fuel depot in Hertfordshire, a major incident investigation was set up. The Buncefield Investigation: Final Report of the Major Incident Investigation Board was produced in 2008, and it contained a number of recommendations, including some related to planning. These recommendations included the following actions:
- Land-use planning should be integrated with the COMAH regulatory system;
 - There is a weakness in the separation between COMAH and Health and Safety Executive advice to local planning authorities; and
 - Planning decisions should also take into account the societal risks by undertaking a Quantified Risk Analysis (QRA).
168. Hazardous installations are operated by a range of companies and industries and form an important part of the economy. Regulated control of these sites is important in order to achieve acceptable health and safety standards to protect the environment and the general public. Proposals for hazardous installations are required to obtain hazardous substances consent that may also be regulated under the Control of Major Accident Hazards (COMAH) Regulations. The competent authorities for COMAH sites are the Health and Safety Executive (HSE) and the Environment Agency.
169. The term ‘hazardous installations’ primarily refers to sites that store significant quantities of industrial chemicals or compounds that are of a hazardous nature; e.g. those that may be explosive or toxic to the environment. As an example, these sites may include chemical manufacturers, or gas storage facilities where the gas is either in bulk storage, in the case of utility companies, or used in production of another product such as aerosols. Pipelines can also be included within the remit of this policy as they can also represent risk to the wider population.
170. Every hazardous installation is different, with varying characteristics and risks. Some types of installations may require a buffer to any residential or other sensitive uses, whereas others may be compatible with such uses. As a result, the only appropriate policy approach is to set out general policy that can be

applied on a case-by-case basis, covering applications for new or intensified hazardous installations, or development in the vicinity of existing installations.

171. The following sites in Cambridge are understood to accommodate hazardous installations/pipelines:

- Cavendish Laboratory, Department of Physics (Explosives);
- Cambridge Holder Station, Newmarket Road (Hazardous Substances);
- Q8 Cambridge Terminal, Ditton Walk (Hazardous Substances);
- National Grid pipelines running from Madingley to Teversham, and through to Addenbrooke's.

172. In the Issues and Options report (2012) hazardous sites/pipelines were not identified as an issue for discussion. The first consideration is whether the Local Plan needs to include a policy on the matter. Given the fact that there are a number of hazardous installations within the city, it seems likely that the council will continue to receive applications for hazardous substances consent over the plan period, and that development will continue to occur in areas near hazardous installations. This would ensure compliance with EU law. The second consideration is what the Local Plan should set out, for example limiting uses to industrial areas, and presuming against sensitive uses in particular zones. However, these would be based on little evidence of risk, and would not be in line with the HSE approach to such sites. As such, it is considered that the policy approach should make reference to the need to consider societal risk caused by new hazardous installations or by development occurring close to these sites.

Findings of the Sustainability Appraisal of the Cambridge Local Plan (July 2013)

173. No adverse impacts from this Policy on the sustainability objectives were predicted as part of the Sustainability Appraisal process.

Key Issues raised during Proposed Submission consultation

Policy 38: Hazardous installations	
Total Representations: 0	
Object: 0	Support: 0
Objections	Not applicable
Support	Not applicable

Minor Modifications suggested following Proposed Submission consultation and implications for Sustainability Appraisal

174. No changes to Policy 38 Hazardous installations or the supporting text are suggested in the Addendum to the Cambridge Local Plan 2014: Proposed

Submission document. There are therefore no impacts on the findings of the Sustainability Appraisal.

Policy 39: Lord’s Bridge – Mullard Radio Observatory

EXISTING POLICY TO BE REPLACED (CAMBRIDGE LOCAL PLAN 2006)	OPTION(S) BEING TAKEN FORWARD FROM THE ISSUES AND OPTIONS REPORT (2012) AND ISSUES AND OPTIONS 2 (2013)	OPTION(S) NOT BEING TAKEN FORWARD FROM THE ISSUES AND OPTIONS REPORT (2012)
8/15 Mullard Radio Astronomy Observatory	Option 200 – Mullard Radio Astronomy Observatory, Lord’s Bridge Consultation Areas	Not applicable

Key issues raised during Issues and Options (2012) and Issues and Options 2 (2013) consultations:

SECTION OF THE ISSUES AND OPTIONS REPORT (2012)	KEY ISSUES ARISING FROM CONSULTATION
Option 200: Mullard Radio Astronomy Observatory, Lord’s Bridge – Consultation Areas	<ul style="list-style-type: none"> • It is an important site of international importance and should be protected; • Add the proposal to re-open the Oxford-Cambridge rail link, it used to run through this site. • It could rule out important sites.
NEW OPTIONS ARISING FOLLOWING COMMUNITY INVOLVEMENT:	
No additional options have been suggested.	

Evidence base:

- Not applicable

How the Policy Came About:

175. The Mullard Radio Astronomy Observatory contains radio and optical telescopes, which are of international importance. Radio astronomy is the study of celestial objects by means of the natural radio waves they emit. The signals emitted by radio sources can be received from the most distant parts of the universe. The telescopes are highly susceptible to many forms of interference including electrical waves, microwaves, light pollution and mechanical vibration.

176. The Local Plan 2006 contains Policy 8/15 Mullard Radio Astronomy Observatory, Lord’s Bridge, which relates to the protection of the use of the

observatory. Although the observatory falls within the administrative boundary of South Cambridgeshire District Council, there are two consultation areas under Local Plan 2006 Policy 8/15, which fall within the city boundary.

177. Option 200 within the Issues and Options Report proposed to take this policy forward. Residents largely supported this approach. One respondent made reference to a proposal to re-open the Oxford-Cambridge railway line, which used to go through this site. Whilst it was not considered appropriate to include this matter within the policy on the Mullard Radio Astronomy Observatory, it is recognised that this issue could be one of the long-term aspirations addressed by the County Council’s Transport Strategy for Cambridge and South Cambridgeshire.
178. The consultation zones for the Mullard Radio Astronomy Observatory have not changed over the years since the adoption of the Cambridge Local Plan 2006. The steer given by Members at January 2013’s Development Plan Scrutiny Sub-Committee agreed to move forward with the development of a replacement policy for the Mullard Radio Astronomy Observatory.

Findings of the Sustainability Appraisal of the Cambridge Local Plan (July 2013)

179. No adverse impacts from this Policy on the sustainability objectives were predicted as part of the Sustainability Appraisal process.

Key Issues raised during Proposed Submission Consultation

Policy 39: Mullard Radio Astronomy Observatory, Lord’s Bridge	
Total Representations: 2	
Object: 0	Support: 2
Objections	Not applicable
Support	<ul style="list-style-type: none"> • Important to safeguard the international importance of this site.

Minor Modifications suggested following Proposed Submission consultation and implications for Sustainability Appraisal

180. No changes to Policy 39 Mullard Radio Astronomy Observatory. Lord’s Bridge or the supporting text are suggested in the Addendum to the Cambridge Local Plan 2014: Proposed Submission document. There are therefore no impacts on the findings of the Sustainability Appraisal.

AUDIT TRAIL: SECTION 5: SUPPORTING THE CAMBRIDGE ECONOMY

Policy 40: Development and Expansion of Business Space

EXISTING POLICY TO BE REPLACED (CAMBRIDGE LOCAL PLAN 2006)	OPTION(S) BEING TAKEN FORWARD FROM THE ISSUES AND OPTIONS REPORT (2012) AND ISSUES AND OPTIONS 2 (2013)	OPTION(S) NOT BEING TAKEN FORWARD FROM THE ISSUES AND OPTIONS REPORT (2012)
<ul style="list-style-type: none"> Policy 7/2 Selective Management of the Economy 	<ul style="list-style-type: none"> Option 124 Discontinue the policy of selective management of the economy Option 132 Promote shared social spaces 	<ul style="list-style-type: none"> Option 122 Continue with selective management of the economy unamended Option 123 Amend selective management of the economy to include some additional uses Option 133 Do not promote shared social spaces

Key issues raised during Issues and Options (2012) and Issues and Options 2 (2013) consultations:

SECTION OF ISSUES AND OPTIONS REPORT	Key Issues
Selective management of the economy – general comments	<ul style="list-style-type: none"> Should look at growth of professional, service and retail industries commensurate with high tech growth; Amend policy to allow small scale companies involved in research, development and production to support commercialisation of research; Existing policy isn't restrictive enough, growth should be encouraged in other areas of the country; This policy has helped keep Cambridge a nice place to live; High tech manufacturing and HQs require major investment in rail and road infrastructure to be competitive; Manufacturing development is unlikely to be viable given high costs in Cambridge; Need to preserve Cambridge's special character; Should support live-work units and studios for inner areas; Building higher, where existing buildings are only one or two storey would help create capacity.

SECTION OF ISSUES AND OPTIONS REPORT	Key Issues
Option 122: Continue with selective management of the economy unamended	<ul style="list-style-type: none"> • Support for employment uses which provide a service for the local population; • The current policy is working; • Focus on strengths and locate larger, land hungry, businesses outside Cambridge; • Reserve land for uses that support high tech industry; • Only relax if local economy is stalling; • Should apply only to new buildings, not conversions, or retrofitting existing buildings; • Unduly restrictive and restricts employment growth in the city; • Amend slightly to allow manufacturing and HQ development associated with the cluster; • Based on looking back and playing it safe.
Option 123: Amend selective management to include some additional uses	<ul style="list-style-type: none"> • High tech HQs should be encouraged, will encourage employment diversity and organic growth; • Support the wider economy; • Promote high end manufacturing; • Increased flexibility may help retain commercialisation of research; and • HQ operations are important to grow large companies; • High tech HQs could just contain back office staff; • High tech HQs and manufacturing should be considered separately; • High tech manufacturing growth needs to be coordinated with surrounding districts, Alconbury is a potential location; • Existing policy allows for high tech HQs to locate to Cambridge; • High tech manufacturing growth will impact on traffic in Cambridge; • Will increase pressures on land supply, increasing prices and rents; • Should apply only to new buildings, not conversions, or retrofitting existing buildings; • Unduly restrictive and will continue to restrict employment growth in the city.
Option 124: Discontinue the policy of selective management of the economy	<ul style="list-style-type: none"> • Let the market decide; • Current policy discourages development of employment space that no longer meets modern standards, restricting supply of office space; • Current policy too restrictive; • Current policy contrary to the spirit of the Use Class Order; • Current policy unfairly discriminates against non-local

SECTION OF ISSUES AND OPTIONS REPORT	Key Issues
	users; <ul style="list-style-type: none"> • Should maintain focus on high tech service sector; • Free for all would allow industrial sprawl; • Encourage businesses with real roots in Cambridge that will remain through the bad times as well as the good.

Evidence base:

- SQW (2011). Cambridge Cluster Study 2011;
- Cambridge City Council (2008) Employment Land Review 2008;
- Cambridge City Council. Employment Land Review Update 2012;
- Cambridge City Council. Employment Land Review Update 2013; and
- Cambridgeshire County Council. Cambridgeshire Local Economic Assessment 2011.

How the policy came about:

1. Cambridge has had a long established policy of ‘Selective Management of the Economy’, whereby employment uses that have an essential need for a Cambridge location or provide a service for the local population are given positive support. This ensures that the limited supply of land in Cambridge is reserved for businesses that support the Cambridge economy.
2. Paragraph 21 of the National Planning Policy Framework states local planning authorities should:

“plan positively for the location, promotion and expansion of clusters or networks of knowledge driven, creative or high technology industries”
3. The Cambridge Cluster Study 2011, looked at the health of the Cambridge Cluster fifty years after its formation. It noted that the policy of Selective management of the Economy may be having unintended consequences: discouraging large scale, high value manufacturing as well as high-tech headquarter functions from locating in the area. It made a number of recommendations with regard the policy of Selective Management of the Economy:
 - Stop the net loss of manufacturing land and, and remove the cap on the scale of high value manufacturing facilities that can be developed – other planning considerations can be used to prevent intrusive activities;
 - Remove the constraint on HQ functions setting up in Cambridge, whether these are the HQs of local firms or inward investment;
 - Allow the development of more open B1 space, in and around Cambridge whilst maintaining the restrictions on science parks to R&D uses (B1(b)).

4. The Employment Land Review 2012 also made a number of recommendations regarding the policy of Selective Management of the Economy, these are summarised below:
 - The assumption that demand for employment land exceeds supply in the Cambridge area is arguably no longer the case and care should be taken to avoid slowing growth;
 - The market is helping to keep out low value activities that do not need to locate in Cambridge.
 - There is a shortage of B1a office permissions in Cambridge.
 - Size restrictions for office and manufacturing appear to be arbitrary.
 - If a distinction needs to be made between what is allowable close to Cambridge and further out, the inner limit of the Green Belt seems a logical boundary.
 - There appears to be little point in requiring research establishments new to the area to show a “special need to be located close to existing major establishments in related fields”.
5. In summer 2012, the Council consulted on three options regarding the future use the policy of Selective Management of the Economy:
 - Continuing with the policy unamended (Option 122);
 - Amending the policy to be more flexible with regard high technology Head Quarters and manufacturing (Option 123); and
 - Discontinuing the policy (Option 124).
6. Responses to the consultation were roughly even in their support for each of the three options. Summaries of the key points raised can be found [here](#).
7. The Interim Sustainability Appraisal Report of these options stated:

“It is not clear the extent to which the Selective Management Option is responsible for Cambridge’s historic and current economic success. However, it is likely that this Option would contribute positively to Cambridge’s economy and City Centre. The amended selective management Option should provide additional flexibility, also capitalising on contribution to the local economy from high tech industries which is not currently realised.

A market based approach would free up investment in new employment land and may result in a more efficient use of employment space. However, this approach may not be the most economically efficient for the city as a whole.”
8. It is apparent that circumstances have changed since the policy of Selective Management of the Economy was last reviewed in 2006. Furthermore the policy is having a number of unintended negative impacts on the economy: discouraging some high value business functions from locating to the area, discouraging redevelopment of offices going past their prime and discouraging new office development. While the Employment Land Review 2012 does recommend a number of changes that could be made to improve the policy, the evidence would appear to suggest that it is no longer needed, and the market will safeguard against large, low value, land hungry uses.

9. The Employment Land Review 2012 identified a need for 101,000m² of floorspace, or 16.2ha of employment land, in B1, B2 and B8 use classes within Cambridge between 2011 and 2031. Monitoring information at 2012 indicated that between April 2011 and March 2012 there were net completions of 2,812m² of B1, B2 and B8 floorspace (although a net loss of 7.31ha of land). Furthermore there were net commitments for 195,063m² of B1, B2 and B8 floorspace on 20.91ha of land. Much of this is large amounts of land and buildings for research and development (Use Class B1(b)) on the edge of the City at Addenbrooke's and at West and North West Cambridge, it also includes a significant amount of offices (Use Class B1(a)) around the station.
10. The Employment Land Review update 2012 was based on forecasts from Cambridge Econometrics' Local Economic Forecasting Model. This model was chosen as for Cambridge, evidence indicated that it was more accurate. The conclusions from the Employment Land Review update 2012a round demand and supply of employment land are set out below:
 - whilst the current exercise and ELR2008 were a decade apart in their timeframes (i.e. 2011-31 and 2001-21 respectively), the more recent projections for Cambridge City and South Cambridgeshire are more cautious than those that informed ELR2008: the earlier exercise assumed substantial employment growth over the period 2001-2011 while the newer data suggest that particularly in Cambridge City, there was actually very little overall employment growth over this decade. For their respective 20-year periods, ELR2008 assumed the need to accommodate 40,000-50,000 jobs (over 2001-21) whereas new projections point to something around 35,000-40,000 jobs (for 2011-31);
 - in addition, the changing sectoral composition of projected employment growth and revised assumptions about employment densities (which have increased substantially) suggest that less additional space will be needed to accommodate each job that is created
 - overall, whereas ELR2008 identified a need for 550,000-600,000sqm of employment space (on 106-114ha of employment land) over the period 2001-21, this study has identified potential demand for 220,000-240,000sqm of employment space (on 55-60ha of employment land) over the period 2011-31
 - the study observed that there is currently sufficient overall provision across Cambridge City and South Cambridgeshire. However the forecasts suggest there is likely to be a shortage of B1a space. Demand for office space is particularly focused on two areas of pressure: the city centre, and the northern fringe around Cambridge Science Park. The market signals are very clear that increasing provision elsewhere will not on its own solve the problem – more has to be done to increase supply in those locations where firms most want to be.
11. There was an update to the Employment Land Review in 2013 to project the East of England Forecasting Model forecast of 22,100 jobs into land. It was

decided to switch to using the East of England Forecasting Model to project job growth, this was because the East of England Forecasting Model was being used by all other Councils in the area and the model produced integrated housing and jobs forecasts. Therefore using the East of England Forecasting Model allows for consistent consideration of jobs growth across the county, fully integrated with population and dwelling growth projections. These land requirements are summarised below:

Use	Jobs	Net floorspace (m ²)	Net land (hectares)
B1a (Offices)	7,000	83,000	12.2
B1b (Research and Development)	2,700	32,700	4.8
B1c/B2 (Industrial)	-300	-11,800	-2.8
B8 (Warehousing)	-600	-33,700	-6.7
All B-use classes	8,800	70,200	7.4

12. These figures tell a similar story to the results from the Employment Land Review update 2012, in that they show growth in office land and research and development land. However, they show a loss of industrial and warehousing land that means that the overall land requirement is lower for Cambridge. Taking this information together the results appear to indicate a move from larger land-hungry employment activities to more dense, office based activities. It should be noted that these figures are based on assumptions around the sectors applied to the outputs from the East of England Forecasting Model, which itself has a number of assumptions built in to it. The employment land requirements are, therefore, a guide and the figures outputting from it are directions of travel rather than hard targets.
13. Comparing these figures with the overall supply of employment land in Cambridge indicates that Cambridge has a good supply of employment land, see the below table:

Employment Land Provision 2011 to 2031	Net land (hectares)	Net floorspace (m ²)
Employment land developed between April 2011 and March 2012	-7.31	2,812
Employment land allocated or with planning permission at March 2012	19.57	197,568
Other sites being allocated in this plan	-0.25	21,387
Therefore total employment land built, allocated or with planning permission 2011 to 2031	12.01	221,767

14. It is worth noting that for two major sites: West Cambridge and Cambridge Northern Fringe East, capacity figure is given beyond what already has planning permission. This is because future work will determine what the additional capacity of these two sites is.
15. Examining how this breaks down by use class is useful to see how this compares with the requirements:

Employment Land Provision 2011 to 2031	Net land (hectares)	Net floorspace (m²)
B1 unspecified employment land developed between April 2011 and March 2012	-0.09	-224
B1a employment land developed between April 2011 and March 2012	-4.06	-1,935
B1b employment land developed between April 2011 and March 2012	-0.19	9,179
B1c/B2 employment land developed between April 2011 and March 2012	-3.01	-5,120
B8 employment land developed between April 2011 and March 2012	0.04	912
Employment land developed between April 2011 and March 2012	-7.31	2,812
B1 unspecified employment land committed at March 2012	-1.08	-6,433
B1a unspecified employment land committed at March 2012	3.98	43,712
B1b unspecified employment land committed at March 2012	22.06	184,079
B1c/B2 unspecified employment land committed at March 2012	-3.30	-15,373
B8 unspecified employment land committed at March 2012	-2.08	-8,417
Employment land allocated or with planning permission at March 2012	19.57	197,568
Other sites being allocated in this plan: B1 unspecified	-	-
Other sites being allocated in this plan: B1a unspecified	4.9	33,364
Other sites being allocated in this plan: B1b unspecified	3.7	25193
Other sites being allocated in this plan: B1c/B2 unspecified	-8.85	-37,170
Other sites being allocated in this plan: B8 unspecified	-	-

Other sites being allocated in this plan	-0.25	21,387
Therefore total employment land built, allocated or with planning permission 2011 to 2031: B1 unspecified	-10.02	-43,827
Therefore total employment land built, allocated or with planning permission 2011 to 2031: B1a unspecified	4.82	75,141
Therefore total employment land built, allocated or with planning permission 2011 to 2031: B1b unspecified	25.57	218,451
Therefore total employment land built, allocated or with planning permission 2011 to 2031: B1c/B2 unspecified	-6.31	-20,493
Therefore total employment land built, allocated or with planning permission 2011 to 2031: B8 unspecified	-2.04	-7,505
Therefore total employment land built, allocated or with planning permission 2011 to 2031	12.01	221,767

16. The land supply is roughly 150,000m² above what the evidence from the East of England Forecasting Model is indicating we need. It is also worth noting that Cambridge Biomedical Campus and Addenbrooke's is by far and away the largest allocated employment site in Cambridge, both in land and floorspace terms, accounting for just over 150,000m² of floorspace. Addenbrooke's Hospital is a regional hospital that serves a far wider area than just Cambridge. If the floorspace at Addenbrooke's were left out of the net floorspace provision to 2031 then the remaining floorspace would be just over 70,000m², around the level the net forecasts predict.
17. Given the large supply of research and development study, the previous policy of Selective Management of the Economy has been superseded by the above policy. This recognises that there are risks to discontinuing this policy. If in terminating this policy this leads to a large increase in business development unrelated to the Cambridge Cluster such that R&D and other high tech employers are harmed (e.g. by being unable to find employment land, or indirectly through the businesses that serve the local area being unable to find land), then this policy could be reintroduced. Careful monitoring of the effects of discontinuing this policy will be needed.
18. The future of the policy of Selective Management of the Economy has been discussed at an officer level with South Cambridgeshire District Council. At the time of writing, it is understood that officers South Cambridgeshire District Council will be proposing discontinuing this policy to members for decision in the near future.
19. The above policy is more flexible and supportive of all types of employment development. It will support the economy by ensuring that proposals for

employment development are dealt with in a positive manner and swiftly approved unless material considerations indicate otherwise. This will help meet objectively assessed need and deliver growth that will support Cambridge as a centre of excellence in research and a world leader in the fields of education and research while also supporting a broader more diverse economy.

Findings of the Sustainability Appraisal of the Cambridge Local Plan (July 2013)

20. The findings of the Sustainability Appraisal of the draft Cambridge Local Plan were that Policy 40 supports proposals that help reinforce the existing high technology and research cluster of Cambridge. Delivering such a quantum of employment land of varying sizes should lead to significant positive effects in terms of ensuring provision of appropriate office space for small and growing high tech businesses and research sectors and high tech headquarters, whilst also providing the potential for high tech manufacturing. The provision of employment land and support for the Universities should capitalise upon Cambridge's reputation and maintain Cambridge's competitiveness in attracting investment and business.
21. In terms of the economy of the city as a whole Policy 40 notes that demand for offices space has contracted to the city centre, where there is now strong demand for such premises. As a result, the policy is to encourage suitable new offices, research and development and research facilities to come forward in the city centre. This should ensure that such development comes forward where it is most required, so supporting the city centre and wider city economies with positive effects.
22. Another key driver of the local economy is the city's universities. These key facilities are the focus of Policy 40, which states that development or redevelopment of university related faculty, research and administrative sites will be supported in the city centre. In addition, this policy calls for development to take advantage of opportunities to improve circulation for pedestrians and cyclists, together with public realm improvements; in turn helping to protect and enhance the locale in addition to supporting the economy of the area. With this being the case, positive effects are predicted. It is also noted that the allocation of two sites in the city centre for university uses may help to create and maintain profitable relationships between businesses and academic researchers.
23. This policy states that new offices, research and development and research facilities are encouraged around the train station, which could lead to positive effects in terms of addressing deprivation and encouraging sustainable transport.

24. In terms of the development of the West Cambridge economy, Policy 40 is likely to be of importance due to its focus on supporting research and development in this area. This should help to build on existing economic strengths, with positive effects. In addition, the policy notes that larger employment sites, with multiple occupiers, should 'consider' whether they want to provide shared social spaces within the site. This is with the rationale of enhancing the vitality and attractiveness of such sites. This approach is in response to the Cambridge Cluster Study (2011) which found that the lack of a social aspect on newer peripheral employment sites makes them less attractive places to locate to. As such, this policy should result in positive effects. However, the approach could be strengthened by stating that such development 'must' provide shared social spaces, in order to help ensure viability.
25. The appraisal made the following recommendation regarding the economy:
- Ensure that new employment areas have strong transport links to Kings Hedges and Abbey Ward areas so that residents of these income and employment deprived areas can take advantage of new employment opportunities elsewhere in the city. It is notable that no policy is directed specifically at addressing problems of deprivation in these areas, albeit it is recognised that Cambridge is a compact city and hence wherever employment is located it will be relatively easy to access by public transport or bicycle.*
26. The draft plan has area specific policies and more general policies that seek to ensure new pedestrian, cycle and public transport links are created where appropriate. No changes were made to the plan following this recommendation.

Key Issues raised during Proposed Submission consultation

Policy 40: Development and Expansion of Business Space	
Total Representations: 8	
Object: 8	Support: 0
Objections	<ul style="list-style-type: none"> • Locate offices close to northern rail station and guided busway stops e.g. north Cambridge; • Lack of clarity for source of figures for West Cambridge in table 5.2. Remove floorspace and land figures from the table; • The city should learn from North West Cambridge; providing housing and local centres at the new employment sites released from the Green Belt; • There is a lack of flexibility toward providing small, low cost employment spaces. Flexibility of use and temporary use allowances would provide the mix of size, type and location of creative work spaces the city is lacking; • The plan threatens the loss of our current office space in the

	<p>Clifton Road area;</p> <ul style="list-style-type: none"> • The plan fails to address the need for office space in central Cambridge more generally; • The plan ignores the needs of knowledge-based, high-tech businesses to be located truly centrally. A "central Cambridge area" should be identified defined by the area within a 1.25 mile radius from Market Hill; • The figures expressed in Table 5.3 may be wrongly interpreted as ceilings and it should be made clear in the supporting text that these figures are baseline figures and may be exceeded subject to other environmental, social economic issues being accepted, justified and mitigated; • Additional wording is sought relating to a policy on cluster development. With the acknowledged shortage of land in Cambridge, it is important that such uses are given clear priority. It does however need to be recognised that in order to support a successful cluster, ancillary and supporting uses must be allowed to locate in close proximity to these primary uses; • The wording of policy 40 should be amended to make more obvious cross reference to Appendix B: Proposals Schedule; • Insufficient land has been allocated for employment use. The employment requirement should be 245,000sqm on 46 hectares of land; • The proposed allocations are either not available, not suitable or will be subject to deliverability issues; • There are no large scale employment allocations proposed to support the economy; • Provision for B1(b) research and development is location sensitive in Cambridge. Employers want to be located in, or on the edge of Cambridge to attract employees and foster academic links; • The proposed science park at Cambridge South site would meet the forecast employment land requirements.
Support	Not applicable

Minor Modifications suggested following Proposed Submission consultation and implications for Sustainability Appraisal

27. A number of minor modifications are suggested in the Cambridge Local Plan 2014: Proposed Submission document marked as PM/5/001 to PM/5/008 for Section Five: Supporting the Cambridge Economy.
28. For clarity and to be consistent in how Addenbrooke's Hospital is referred to throughout the plan, a minor modification to criterion (c) of Policy 40: Development and expansion of business space is suggested. This change PM/5/001 reads as follows:

“c. research and research and development facilities will be supported in the Cambridge Biomedical Campus ~~and Addenbrooke’s~~ (including Addenbrooke’s Hospital), and at the West Cambridge site, provided they satisfy relevant policies in Section Three of the plan.”

29. In response to a representation (Representation Number 26595), under Tables 5.1, 5.2 and 5.3, PM/5/002 suggests that the source of the data in these tables should be added. This reads:

“Source: Cambridge Business Commitments and Completions 2012, Cambridgeshire County Council.”

30. In response to a representation (Representation Number 27400), PM/5/003 suggests an additional line of text under Table 5.2 to read:

“The figures in the above table are indicative capacities and subject to testing through the planning application process”

31. These changes are not considered to impact on the findings of the Sustainability Appraisal.

Policy 41: Protection of Business Space

EXISTING POLICY TO BE REPLACED (CAMBRIDGE LOCAL PLAN 2006)	OPTION(S) BEING TAKEN FORWARD FROM THE ISSUES AND OPTIONS REPORT (2012) AND ISSUES AND OPTIONS 2 (2013)	OPTION(S) NOT BEING TAKEN FORWARD FROM THE ISSUES AND OPTIONS REPORT (2012)
<ul style="list-style-type: none"> Policy 7/3 Protection of Industrial and Storage Space 	<ul style="list-style-type: none"> Option 127 Amend the policy of protection of industrial and storage space to encourage other forms of employment development Option 129 Protection of office space 	<ul style="list-style-type: none"> Option 125 Continue with protection of industrial and storage space unamended Option 126 Amend the policy of industrial and storage space by deleting all protected sites Option 128 Do not protect office space

Key issues raised during Issues and Options (2012) and Issues and Options 2 (2013) consultations:

SECTION OF ISSUES AND OPTIONS REPORT	Key Issues
Protection of industrial and storage space – general comments	<ul style="list-style-type: none"> • Without protection, no industrial site can fight off residential land values; • Plans should be able to rapidly respond to changing circumstances; • Policies should not seek to protect sites where there is no reasonable prospect of the site being used for that purpose; • Increased flexibility, but not to change to offices, but for cultural activities or even housing; • Vital need for small workshops as initial homes for new businesses.
Option 125: Continue with protection of industrial and storage space unamended	<ul style="list-style-type: none"> • The effectiveness of its implementation should be enhanced; • Critical to success of Cambridge economy; • Traffic generated by these uses tend to be outside rush hours; • Once lost, potential is gone forever; • Cambridge’s strengths lie in service sector; • These uses that have significant transport impacts, should be relocated outside Cambridge; • Empty sites could have office uses on them; • Some protected industrial sites do not have much industry on them; • Fails to provide sufficient flexibility.
Option 126: Amend the policy of protection of industrial and storage space by deleting all protected sites	<ul style="list-style-type: none"> • Amend criteria to assess sites; • Increased flexibility where employment sites are surplus to requirements; • Cambridge’s strengths lie in service sector; • Will allow redevelopment to residential, adding to congestion, and reducing employment opportunities for low skilled workers; • Once sites are lost from employment use, they are lost forever.
Option 127: Amend the policy of protection of industrial and storage space to encourage other forms of employment	<ul style="list-style-type: none"> • Should apply where there are persistent vacancies; • Improve job diversity; • Increased flexibility; • Counter productive to enforce unviable uses to remain on a site; • Loss of best industrial sites; • Important to sustainable live/work plans; • Cambridge’s strengths lie in the service sector;

SECTION OF ISSUES AND OPTIONS REPORT	Key Issues
development	<ul style="list-style-type: none"> • Still not sufficiently flexible.
Protection of office space – general comments	<ul style="list-style-type: none"> • Focus on supporting redevelopment/upgrading of existing stock; and • Increased offices in the historic core will impact congestion and the environment.
Option 128: Do not protect office space	<ul style="list-style-type: none"> • Not necessary, market forces can achieve a sustainable balance; • Increased flexibility for owners; • Many existing empty offices, and new offices going up near station; no need to protect offices.
Option 129: Protection of office space	<ul style="list-style-type: none"> • Important to sustainable live/work plans; • Not necessary, market forces can achieve a sustainable balance; • Reduced flexibility for owners, impacting on Cambridge economy; • Many existing empty offices, and new offices going up near station; no need to protect offices.

SECTION OF ISSUES AND OPTIONS REPORT 2	Key Issues
Annex L1 Protected industrial sites	<ul style="list-style-type: none"> • Retain sites across the city to strengthen local job/housing link • Mercer’s Row PIND03 is a highly successful site • Agree with PIND06 • Remove designation from Clifton Road industrial estate – opportunity for city centre mixed use residential and commercial development

Evidence base:

- SQW (2011). Cambridge Cluster Study 2011;
- Cambridge City Council (2008) Employment Land Review 2008;
- Cambridge City Council. Employment Land Review Update 2012;
- Cambridge City Council. Employment Land Review Update 2013; and
- Cambridgeshire County Council. Cambridgeshire Local Economic Assessment 2011.

How the policy came about:

32. In the past Cambridge has sought to protect land in industrial and storage use, in order to balance the policy of Selective Management of the Economy and maintain a diverse range of jobs and a balanced economy.

33. Paragraph 14 of the National Planning Policy Framework states that:
- “Local Plans should meet objectively assessed need, with sufficient flexibility to adapt to rapid change, unless:
- any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole; or
 - specific policies in this Framework indicate development should be restricted.
34. Paragraph 22 of the National Planning Policy Framework states that:
- “Planning policies should avoid the long term protection of sites allocated for employment use where there is no reasonable prospect of a site being used for that purpose. Land allocations should be regularly reviewed. Where there is no reasonable prospect of a site being used for the allocated employment use, applications for alternative uses of land or buildings should be treated on their merits having regard to market signals and the relative need for different land uses to support sustainable local communities.”
35. Paragraph 51 of the National Planning Policy Framework states that local planning authorities should:
- “normally approve planning applications for change to residential use and any associated development from commercial buildings (currently in the B use classes) where there is an identified need for additional housing in that area, provided that there are not strong economic reasons why such development would be inappropriate.”
36. In summer 2012 the Council consulted on three options regarding the future of the protection of industrial and storage land:
- Continuing with the policy unamended (Option 125);
 - Amending the policy to be more flexible by deleting protected industrial sites (Option 126); and
 - Amending the policy to be more flexible by encouraging other forms of development (Option 127).
37. Response to the consultation was mixed, with support for all of the options.
38. The Interim Sustainability Appraisal Report for these options stated:
- “Option 125 should contribute positively to ensuring a diversity of work opportunities with good transport accessibility. However, it will be important to ensure that protection status should match the identified need.

39. Applying a citywide approach (Option 126) to protection of industrial storage space would enable a more efficient use of available land while still offering a degree of protection through the use of existing criteria. Option 126 could help deliver higher levels of low skilled job opportunities compared to Option 125 helping address issues relating to income and employment deprivation.
40. Providing additional flexibility based on specific criteria which would address the misapplication of Option 125 (this policy has not succeeded in preventing the loss of industrial floorspace in the past) should provide greater opportunities to address community and well being and economy related issues, particularly whereby criteria allow change of use to reduce employment inequalities.”
41. Option 125 proposes that development within a protected industrial cannot result in the loss of floorspace in B1c, B2 or B8 use under any circumstances. Paragraph 22 of the National Planning Policy Framework precludes carrying forward option 125, as the approach does not distinguish between circumstances where there is a reasonable prospect of that use continuing. Empty land and buildings benefit no one.
42. Evidence from the Employment Land Review 2012 and the Cluster Study is that loss of industrial land continues to be an significant issue for Cambridge, and they both recommend that manufacturing sites within and close to Cambridge should be protected from loss to housing or retail, but equally it is important to recognise that market factors dictate that this will not be possible in all cases. The Employment Land Review notes that allowing hybrid buildings, that enable flexibility of use, could be one way of addressing this issue.
43. Top industrial rents in Cambridge stand at around £8 - £9 per square foot, outside the city centre this drops to £5.50 - £6. Research by Halifax in 2011 found that Cambridge residential prices were £2,783 per square metre, or £259 per square foot. Even allowing for the difference in the size of industrial buildings and residential buildings, this is still a significant difference. Without some form of protection, land and buildings in industrial use in Cambridge cannot fight off the residential land values that compete with them.
44. However, the Employment Land Review notes that safeguarding of industrial land may not be possible in all instances. As older sites become functionally obsolete, and making them attractive to users requires their redevelopment, the low value of industrial buildings can make their redevelopment unviable. In this instance allowing the development of alternative employment uses, such as offices or ‘hybrid buildings’ (buildings combining office functions, but also Research and Development and production facilities all under one roof), would be a way of making the redevelopment more viable and retaining the site in employment use.

45. The transport impacts of redevelopment would be considered at the planning application stage. Once sites are lost from industrial use they are unlikely to go back into this use, however the National Planning Policy Framework requires the policy to be flexible, the policy will still seek to retain the site in employment use.
46. In summer 2012 the Council also consulted on two options regarding the future of the protection of other employment space:
 - Do not protect office space (Option 128); and
 - Protect office space (Option 129).
47. There was support for both options.
48. The Interim Sustainability Appraisal Report for these options stated:

“There is likely to be a medium term shortage of office space in Cambridge. By not protecting office space this situation could be exacerbated. The extent to which this would impact the Cambridge economy is not clear and would depend on the value added by other proposed uses.
49. Protecting office space would ensure provision for small and growing businesses (an identified need) adding to the diversity of the Cambridge economy.”
50. The Employment Land Review 2012, using the Cambridge Econometrics Local Economic Forecasting Model (LEFM), translated the baseline and policy-based LEFM projections, into floorspace requirements, by use type. For B1a offices in Cambridge this translated into a requirement of 45-59,000m² by 2031 (or 6.7-8.7ha), and for South Cambridgeshire 98-100,000m² (or 30.0-30.6ha). The review notes that, in principle these figures should be adjusted upwards to create some flexibility.
51. In looking at the current supply of B1a land, the Employment Land Review 2012 compares a number of different sources. Information from Savills Commercial Limited identified 97,266m² of grade A office space where there is known potential for development in the short term, it should be noted that this excludes strategic allocations such as Northstowe and North West Cambridge.
52. The Employment Land Review notes that at March 2011 there were sites with planning permission for 157,281m² (or 29.16ha) of B1a in Cambridge and South Cambridgeshire. However the Employment Land Review notes:

“the apparent plentiful supply of land for B1a offices in the City almost certainly reflects the fact that past completions have been constrained by limited supply, not market demand. Table 3-9 shows a net loss of B1a land over the last decade, which if continued into the future, and in the light of the

forecast increase in demand for office premises from professional, business and financial services, would cause supply shortages”

53. The Employment Land Review also notes that in the last few years demand has contracted into the most popular locations, the City Centre (including Hills Road down to the Station) and the Science and Business Parks around the Northern Fringe.
54. It also notes that there is currently very little availability of offices in prime city centre, and much of the vacancies lie within secondary locations in Cambridge and the wider area. When looking at the policy of Selective Management of the Economy the Employment Land Review notes:
“There is a shortage of offices with B1a permissions in Cambridge. Unless this is addressed through a combination of intensification and making more land available in the more attractive locations, it could adversely affect projected employment growth, which is mainly in office sectors. The evidence suggests that a combination of applying local user restrictions and making space available beyond the immediate environs of Cambridge is not going to solve the problem of the demand/supply imbalance in the city”
55. County monitoring data for March 2012 notes that there are net commitments for 43,712m² (or 3.98ha) of B1a floorspace in Cambridge and 45,726m² (or 10.93ha) in South Cambridgeshire. This is substantially lower than the sites with planning permission identified in the Employment Land Review 2012. New allocations at Cambridge Northern Fringe will help meet demand and provide choice to businesses, however if substantial numbers of offices are lost then there is a risk that levels of jobs growth will be adversely effected.
56. The risk in leaving it to market forces is that secondary offices will see land values decrease relative to residential in the short to medium term, and there will be pressure to redevelop them. This could hinder job growth in the longer term, when the wider economy improves, and leave capacity to meet demand undermined.
57. The conclusion reached was that it was appropriate to protect both offices and industrial land; however this may have the unintended consequence of making redeveloping research and development land more attractive. Therefore it was considered appropriate to protect all land in B Use Class.

Findings of the Sustainability Appraisal of the Cambridge Local Plan (July 2013)

58. Policy 41 seeks to address the loss of industrial floorspace by affording greater protection to ‘Protected Industrial Land’ and by establishing a presumption against the loss of all other protected employment land. This should lead to significant positive effects in terms of maintaining the supply of a range of industrial land for businesses that underpin the research and knowledge-based

industries in Cambridge that are so important to the national, regional and local economy.

59. The appraisal notes that policy 41 protects various employment sites across the city which could lead to positive effects in terms of employment and deprivation in the Functional Areas around these sites.

60. The appraisal made the following recommendation regarding the economy:

Ensure that new employment areas have strong transport links to Kings Hedges and Abbey Ward areas so that residents of these income and employment deprived areas can take advantage of new employment opportunities elsewhere in the city. It is notable that no policy is directed specifically at addressing problems of deprivation in these areas, albeit it is recognised that Cambridge is a compact city and hence wherever employment is located it will be relatively easy to access by public transport or bicycle.

61. The draft plan has area specific policies and more general policies that seek to ensure new pedestrian, cycle and public transport links are created where appropriate. No changes were made to the plan following this recommendation.

Key Issues raised during Proposed Submission consultation

Policy 41: Protection of business space	
Total Representations: 10	
Object: 9	Support: 1
Objections	<ul style="list-style-type: none"> • Allowance for temporary use change of space should be included to allow greater flexibility into the future as markets change; • Not enough new centres have been identified in policy 6; • Add "Criteria (c) and (d) of the policy does not apply to existing employment sites that are allocated for non-employment uses within the Local Plan"; • Draft Policy 41 is objected to as it is far too restrictive, contrary to national policy and does not take account of the realistic and commercial needs of businesses and landowners within the city. This policy should be amended to read: "d. For a period of three months for employment use ..."; • The arbitrary and blanket protection of all existing employment premises within the city boundary will affect the deliverability of a host of other town centre uses; • The policy should include within the employment use definition scope to include sui generis uses which could be assessed on their merits rather than excluding them entirely; • Clarification sought as to whether or not this particular policy would be applicable to allocated sites such as Mount Pleasant

	<p>House;</p> <ul style="list-style-type: none"> An additional policy criterion should be added, as follows: "In the case of public sector bodies, the loss of floorspace should be considered against their overall property portfolio that is within employment use. Where the loss of an employment building / floorspace would facilitate the continued use and investment in other office building or other ways of delivering services, then a presumption for retention should no longer apply."
Support	<ul style="list-style-type: none"> Not everyone works in high-tech industry, there has to be provision for more traditional industry too.

Minor Modifications suggested following Proposed Submission consultation and implications for Sustainability Appraisal

62. No changes to Policy 41: Protection of Business Space are suggested in the Addendum to the Cambridge Local Plan 2014: Proposed Submission document. There are therefore no impacts on the findings of the Sustainability Appraisal.

Policy 42: Connecting new developments to digital infrastructure

EXISTING POLICY TO BE REPLACED (CAMBRIDGE LOCAL PLAN 2006)	OPTION(S) BEING TAKEN FORWARD FROM THE ISSUES AND OPTIONS REPORT (2012) AND ISSUES AND OPTIONS 2 (2013)	OPTION(S) NOT BEING TAKEN FORWARD FROM THE ISSUES AND OPTIONS REPORT (2012)
Not applicable.	Not applicable.	Not applicable.
The policy came about following representations at Issues and Options consultation.		

Key issues raised during Issues and Options (2012) and Issues and Options 2 (2013) consultations:

SECTION OF ISSUES AND OPTIONS REPORT	Key Issues
Not applicable.	Not applicable.

Evidence base:

- SQW (2011). Cambridge Cluster Study 2011; and
- Cambridgeshire County Council. Cambridgeshire Local Economic Assessment 2011

How the policy came about:

63. This is a new policy that has not been consulted upon before.
64. Representations were received to the summer 2012 consultation suggesting the inclusion of such a policy. New development should be served by high quality digital infrastructure, ensuring this is done at the stage of construction will benefit new occupants and the economy as a whole. Other local planning authorities in the area have consulted on similar policies, having a coordinated approach ensures that developers in Cambridge can expect similar requirements for similar developments in Cambridgeshire.

65. Paragraph 43 of the National Planning Policy Framework states:

“local planning authorities should support the expansion of electronic communications networks, including telecommunications and high speed broadband.”

Policy 42 is therefore considered to be in conformity with the National Planning Policy Framework.

Findings of the Sustainability Appraisal of the Cambridge Local Plan (July 2013)

66. No adverse impacts from this Policy on the sustainability objectives were predicted as part of the Sustainability Appraisal process.

67. The appraisal made the following recommendation regarding the economy:

Ensure that new employment areas have strong transport links to Kings Hedges and Abbey Ward areas so that residents of these income and employment deprived areas can take advantage of new employment opportunities elsewhere in the city. It is notable that no policy is directed specifically at addressing problems of deprivation in these areas, albeit it is recognised that Cambridge is a compact city and hence wherever employment is located it will be relatively easy to access by public transport or bicycle.

68. The draft plan has area specific policies and more general policies that seek to ensure new pedestrian, cycle and public transport links are created where appropriate. No changes were made to the plan following this recommendation.

Key Issues raised during Proposed Submission consultation

Policy 42: Connecting New Developments to Digital Infrastructure	
Total Representations: 1	
Object: 1	Support: 0
Objections	No Key Issues.
Support	Not applicable

Minor Modifications suggested following Proposed Submission consultation and implications for Sustainability Appraisal

69. No changes to Policy 42: Connecting New Developments to Digital Infrastructure are suggested in the Addendum to the Cambridge Local Plan 2014: Proposed Submission document. There are therefore no impacts on the findings of the Sustainability Appraisal.

Policy 43: University Faculty Development

EXISTING POLICY TO BE REPLACED (CAMBRIDGE LOCAL PLAN 2006)	OPTION(S) BEING TAKEN FORWARD FROM THE ISSUES AND OPTIONS REPORT (2012) AND ISSUES AND OPTIONS 2 (2013)	OPTION(S) NOT BEING TAKEN FORWARD FROM THE ISSUES AND OPTIONS REPORT (2012)
<ul style="list-style-type: none"> Policy 7/5 Faculty Development in the Central Area, University of Cambridge; Policy 7/8 Anglia Ruskin University East Road Campus 	<ul style="list-style-type: none"> Option 143 Continued development and redevelopment of the University of Cambridge's faculty sites Option 146 Anglia Ruskin University – faculty development 	<ul style="list-style-type: none"> Not applicable.

Key issues raised during Issues and Options (2012) and Issues and Options 2 (2013) consultations:

SECTION OF ISSUES AND OPTIONS REPORT	Key Issues
Option 143: Continued development of University of Cambridge's	<ul style="list-style-type: none"> Essential that the Council continues to support the University of Cambridge which supports Cambridge's economy, social and cultural life and environment; Support further faculty development provided the option is monitored;

SECTION OF ISSUES AND OPTIONS REPORT	Key Issues
Faculty Sites	<ul style="list-style-type: none"> • North West Cambridge will prove to be very sustainable for students; • Strongly support but add Madingley Rise to list of faculty sites; • Support but should also support other Higher and Further Education colleges such as Westminster College and Abbey College; • Mill Lane is a prime site for more student accommodation as part of mixed use; • The University of Cambridge should downsize as it has outgrown the nest; • The Colleges equally contribute to economy as they have their own governance, property and staff; • Addenbrooke's has grown enough; • North West Cambridge and West Cambridge developments do not meet the needs of the Colleges in the city centre.
Option 146: Anglia Ruskin Faculty Development	<ul style="list-style-type: none"> • ARU needs to expand its postgraduate provision and wants to stay on East Road and Young Street site and is unlikely to relocate; • The Master Plan for East Road should be allowed to evolve; • ARU have a satellite site in South Cambridgeshire District at Whitehouse Lane which is in the Green Belt; • Any satellite should be as close as possible; • Relocate student residences from East Road to create more space rather than developing a second campus; • ARU should be expanded in Chelmsford and find a third site in Norfolk or Suffolk; • ARU is important to local economy but has lost a lot of green space at East Road. They should look to Fulbourn and further afield if they want to expand further; • Petersfield should not become ARU's campus; • There should be no more ARU campuses in the city.

Evidence base:

- North West Cambridge Action Area Plan (Oct 2009);
- University of Cambridge Masterplan for the West Cambridge Site (2002)
- Cambridge City Council (2010) Old Press Mill lane SPD;
- University Of Cambridge Estate Management and Building Services (2007). Estate Strategy 2007
- Anglia Ruskin University (March 2009). Cambridge Campus Redevelopment, Masterplan Revision B.

How the policy came about:

70. The National Planning Policy Framework requires local authorities to support knowledge industries and the development of a strong and competitive economy. Supporting further education organisations is compatible with national policy aims and the proposed economic vision for the city as a centre of excellence and world leader in higher education.
71. For Option 143, the Interim Sustainability Appraisal Report noted that the University of Cambridge is a vital driver of the Cambridge economy. This option's approach to supporting the University in developing and redeveloping should help positively contribute to the sustainability objectives. In particular the Option should provide a balanced approach to development in addressing economic, social and environmental issues. At this stage it is not possible to appraise how this Option would contribute to maintaining open and green space and the character of the built environment in West Cambridge, identified key sustainability issues.
72. For Option 146 the Interim Sustainability Appraisal noted that this option provides a flexible approach to meeting the needs of Anglia Ruskin University and correspondingly conforms well to the sustainability topics. In particular, permitting development of a satellite campus would require a number of environmental criteria to be met including a green and connected location combining a number of sports and social infrastructure helping support a healthy student community.
73. Main components of the University of Cambridge's Estate Strategy comprise:-
 - To develop sites near the University Library for most of the arts and social sciences.
 - To concentrate the humanities and social sciences on the Sidgwick, New Museums and Downing sites.
 - To concentrate the biological sciences on the Downing site and the rear of the Old Addenbrooke's site.
 - To develop the West Cambridge site for physical sciences and technology departments, and associated support functions.
 - To intensify the Astrophysics facilities at Madingley Rise
 - To continue to add to medical research facilities on The Cambridge University Hospitals NHS Foundation Trust site and Cambridge Biomedical Campus.
 - To consolidate Central Administration on three sites, namely The Old Schools, part of the Old Press/Mill Lane Site and Greenwich House, and to reduce the use of houses in central Cambridge for administrative purposes.
 - To redevelop the Old Press/Mill Lane site for mixed uses including the University of Cambridge's operational purposes, collegiate and commercial,

and to redevelop the New Museums site with the introduction of some non-operational uses.

- To reduce the amount of leased accommodation occupied for operational purposes.
 - To add to the stock of residential accommodation, providing a range of tenures and accommodation types.
 - To focus future expansion primarily at North West Cambridge where a Master Plan has now been agreed and an outline consent granted for 3000 new homes of which 1,500 key worker homes, 60,000m² of new faculty development and 40,000m² of research and development accommodation including two new colleges 2,000 rooms a hotel and local centre.
74. The University of Cambridge is now focusing upon guiding future development by means of a Capital Plan which seeks to optimise the use of all existing space and investments. The University of Cambridge expects that its core academic needs will be met by the intensification and better use of its existing sites over the period up to 2031.
75. A Supplementary Planning Document (SPD) has been prepared and adopted for Old Press/Mill Lane in 2010. This will have different status under the new plan as a material consideration rather than an SPD. Masterplanning work is about to commence here and on New Museums. Old Press/Mill Lane is likely to come forward after 2020. A specific policy related to the Old Press/Mill Lane Opportunity Areas is included within Section 3 of the draft Local Plan.
76. North West Cambridge will provide for most of long term major growth needs of the University Of Cambridge for faculty development and key worker housing over the next two decades. The World Conservation Monitoring Centre and other environmental research units previously identified as needing to cluster at North West Cambridge are now focusing their accommodation search on the New Museums site rather than at North West Cambridge.
77. Land is also available at West Cambridge, which will conclude development there for further faculty development and commercial R&D development. This will also include new academic facilities and more relocations from central sites e.g. Material Science, Chemical Engineering and Biotechnology who are moving off the New Museums site. West Cambridge is also being for possible intensification as current densities are low and are not making the best use of land.
78. Old Press/Mill Lane will also be likely to be a key site for the Colleges as part of mixed use development. This should be picked up within any redrafting of the policy and supporting text.
79. The construction of Addenbrooke's Biomedical Park is just commencing and the provisions of the existing 2006 Local Plan include land for further growth beyond 2016 to the south. Cancer Research UK are planning a further a Phase

2 development within the next 5 years and the recent relocation of the MRC LMB building will create scope for other refurbishment of academic research space within the main hospital complex. This is covered within the Master Plan for this site. The continued growth of Addenbrooke's and the biomedical cluster is vital to the Cambridge economy and cannot be stifled.

80. In conclusion the University of Cambridge's key growth needs are being adequately met by the developments in West and North West Cambridge and around Addenbrooke's. The current plan policy needs to continue to focus on faculty development on central sites. The 2006 policy has provided a useful focus and should be rolled forward to deal with remaining future priorities within the City centre.
81. The growth and success of Anglia Ruskin University continues to benefit the local economy. It performs a significant role, which is not confined to the needs of the region. It has a growing number of important specialisms including international links and relations. Its Department of Optometry carries out world leading research. It is also a major provider of training in health and social care and its role internationally is growing. A supportive policy approach would be compatible with the economic aims of the National Planning Policy Framework.
82. Fortunately, Anglia Ruskin University has not witnessed the 14% drop in applicants experienced by Universities nationally. The rate of growth in student numbers, however, has not been as rapid as was envisaged at the time of the 2006 Local Plan. Student numbers have not yet reached the 12,000 level forecast in 2006 for 2009/10. Anglia Ruskin University currently has 8,911 students of which 7,636 are undergraduates and 1,275 are post graduates. Anglia Ruskin University expects student numbers to increase to 9,950 by 2021. Funding for undergraduate courses is reducing but demand is still there. Anglia Ruskin University is increasingly diversifying towards post graduate and post doctorate study courses.
83. A masterplan was agreed in 2009 that was intended to guide the redevelopment of the East Road Campus over the ensuing 5-10years.
84. A further satellite site at Young Street has recently been approved to provide around 5,000m² of new accommodation in 3 phases for the Institute of Nursing that is moving from Fulbourn. This floorspace however, does not assist in meeting the shortfall demand on the East Road campus as it is being relocated from Fulbourn.
85. The existing Local Plan envisaged some satellite development for Anglia Ruskin University at Cambridge East. This is now not likely to come to fruition, as Cambridge East is not proceeding at the current time as originally envisaged.

86. Various administrative functions have been catered for within other city centre office space during the East Road site redevelopment. There may be a case for looking to accommodate administrative back office work in office blocks close to the main campus rather than on the teaching campus itself.

Findings of the Sustainability Appraisal of the Cambridge Local Plan (July 2013)

87. Policy 43 seeks to support University Faculty Development for the development or redevelopment of faculty, research and administrative sites for both the University of Cambridge and Anglia Ruskin University. The Universities are key drivers of economic growth in the sub region and this policy would allow the Universities to grow. Policy 44 allows for the development of existing and new specialist schools subject to criteria regarding accommodation, social and welfare facilities for non-local students. Policy 46 sets out the requirements for student housing that allows the Universities and specialist colleges to grow. Specialist colleges and language schools contribute £78m to the local economy and this policy allows them to grow and boost the local economy, whereas the previous Local Plan prevented the expansion of new language schools and specialist schools/tutorial colleges within Cambridge. As such, the plan would lead to significant positive effects in terms of economic growth at the Universities and specialist schools.
88. Another key driver of the local economy is the city’s universities. These key facilities are the focus of Policy 40, which states that development or redevelopment of university related faculty, research and administrative sites will be supported in the city centre. In addition, this policy calls for development to take advantage of opportunities to improve circulation for pedestrians and cyclists, together with public realm improvements; in turn helping to protect and enhance the locale in addition to supporting the economy of the area. With this being the case, positive effects are predicted. It is also noted that the allocation of two sites in the city centre for university uses may help to create and maintain profitable relationships between businesses and academic researchers.

Key Issues raised during Proposed Submission consultation

Policy 43: University Faculty Development	
Total Representations: 136	
Object: 135	Support: 1
Objections	<ul style="list-style-type: none"> • No further expansion of the East Road Campus; • No student development and Anglia Ruskin University expansion in the Petersfield area - build more well-proportioned, affordable housing for young families instead; • If Anglia Ruskin University wishes to expand then the East Road site is not the most sustainable location. Consideration should be given to moving out of the City Centre or out of Cambridge;

	<ul style="list-style-type: none"> • The local plan should acknowledge that Petersfield is a densely populated residential area and the needs and considerations of local residents should be given priority; • A further increase in the transient population in Petersfield will affect community cohesion; • The provision of purpose-built student accommodation negatively impacts local families, by depriving them of an income stream from renting rooms out to students; • The continued development and redevelopment of University of Cambridge sites is essential, to enable the University of Cambridge and the city of Cambridge to achieve the Vision for Cambridge to develop further as a world leader and centre of excellence in the fields of higher education and research; • Policy should include different types of University development; • Policy should include proposed uses and masterplanning process for the New Museums site; • Policy should include other University of Cambridge sites with development potential; • Paragraph 5.24 should include actual planned student growth; • The local plan should not continue its current focus on higher, further and university education, at the expense of recognising the role of the entire education sector; • Regarding the New Museums site, English Heritage are concerned that the University of Cambridge should remain within the central area, and that faculties are not decentralised. In addition, the vast majority of buildings on this site should be retained, especially the Edwardian blocks which contribute to the cohesive character of this part of the conservation area. Concern that this site is included in the plan given the apparently limited opportunities for change; • Reductions in car parking provision should not impact on blue badge parking provision.
Support	<ul style="list-style-type: none"> • Support for the reference to 'the development of medical teaching facilities and related university research institutes at Cambridge Biomedical Campus'.

Minor Modifications suggested following Proposed Submission consultation and implications for Sustainability Appraisal

89. Four minor modifications are suggested to Policy 43: University Faculty Development in the Addendum to the Cambridge Local Plan 2014: Proposed Submission document. These are listed as PM/5/004 to PM/5/007 inclusive in the Addendum.

90. In response to a representation (Representation Number 26631) and for clarity as it does not simply address faculty development, PM/5/004 suggests amending the title of the policy to read "Policy 43: University Faculty

Development”, whilst PM/5/005 suggests amending the subtitles of the policy to read:

“~~Faculty~~ University development in the City Centre

~~Faculty~~ University development outside the City Centre”

91. PM/5/006 is suggested in response to a representation (Representation Number 26631) and to provide clarity on the restrictions on development. Policy 43, criterion (a), as amended, reads:

“a. ~~optimise the~~ make effective use of land, including a mix of uses on larger sites to meet the needs of the relevant institution, and”

92. PM/5/007 is suggested in response to a representation (Representation Number 26631) and to provide clarity on the restrictions on development. Policy 43, criterion (e), as amended, reads:

“e. the development of medical teaching and research facilities and related university research institutes at Cambridge Biomedical Campus (see Policy 16); and”

93. None of the changes to Policy 43: University faculty development suggested in the Addendum to the Cambridge Local Plan 2014: Proposed Submission document are considered to impact on the findings of the Sustainability Appraisal.

Policy 44: Specialist Colleges and Language Schools

EXISTING POLICY TO BE REPLACED (CAMBRIDGE LOCAL PLAN 2006)	OPTION(S) BEING TAKEN FORWARD FROM THE ISSUES AND OPTIONS REPORT (2012) AND ISSUES AND OPTIONS 2 (2013)	OPTION(S) NOT BEING TAKEN FORWARD FROM THE ISSUES AND OPTIONS REPORT (2012)
<ul style="list-style-type: none"> Policy 7/11 Language Schools 	<ul style="list-style-type: none"> Option 151 Specialist colleges such as secretarial and tutorial colleges Option 152 Language schools 	<ul style="list-style-type: none"> Not applicable.

Key issues raised during Issues and Options (2012) and Issues and Options 2 (2013) consultations:

SECTION OF ISSUES AND OPTIONS REPORT	Key Issues

SECTION OF ISSUES AND OPTIONS REPORT	Key Issues
Option 151: Specialist colleges such as secretarial and tutorial colleges	<ul style="list-style-type: none"> • Support introduction of new policy to enable specialist schools to provide financial and cultural benefits; • Language schools make an important contribution to the economy; • All specialist schools should be treated the same way.
Option 152: Language Schools	<ul style="list-style-type: none"> • Option 152 preferred provided large residential houses are not lost. Keep controls to prevent too many specialist schools opening; • Both types of school should provide adequate hostels; • Retain a policy on language schools but widen to include other types of school. Restrict as far as legally possible opening of other new schools; • It is inappropriate to refer to behaviour when considering whether a policy towards expansion is appropriate.

Evidence base:

- SQW (2011). Cambridge Cluster Study 2011;
- EFL Services Ltd Survey (1992). English Language Students in Cambridge;
- Cambridge City Council (1983). Specialist Schools & Colleges in Cambridge;
- Survey of Specialist Schools to be completed
- SQW (2011). Cambridge Cluster Study 2011;
- EFL Services Ltd Survey (1992). English Language Students in Cambridge;
- Cambridge City Council (1983). Specialist Schools & Colleges in Cambridge;

How the policy came about:

94. The National Planning Policy Framework requires local authorities to support the knowledge industries and the development of a strong and competitive economy. Supporting further education organisations is compatible with national policy aims and the proposed economic vision for the City as a centre of excellence and world leader in higher education.
95. The current Local Plan has a policy which only deals with language schools. However, these are only one type of specialist school, so future policies would need to extend to include all of the other types of independent specialist schools and possibly independent academies. The numbers of these have increased from around three in the 1990s to approximately 11-14 currently. Examples include CATS in Round Church Street, Abbey College in Station Road, and Glisson Road, and Bellerby's College in Bateman Street and Manor Community College. Others such as Cambridge Centre For Sixth Form Studies are educational charities and no profit organisations more akin to a state registered schools catering for local students and boarders.

96. Many of these types of organisation attract school age children who live with families in the City and surrounding area or commute into Cambridge from other locations in the sub region. As such they do not as a rule place undue pressure on the local housing market and are therefore less of a concern in this regard compared to mainstream language schools which are a distinct and separate type of specialist school. By and large they don't offer English language courses. In some cases, these types of organisation attract students from further afield and if they do they tend to have associated hostel accommodation for boarders as part of the operation e.g. Cambridge Centre for Sixth Form Studies. The former local plan policy made an exception for secretarial and tutorial colleges allowing them to grow by 10% of their overall gross floorspace provided they serve a mainly local catchment and provide residential accommodation, social and amenity facilities for all non local students. This floorspace restriction as in the case of language schools may not however be effective or appropriate.
97. The National Planning Policy Framework paragraph 21 encourages local authorities to support the knowledge industries and the development of a strong and competitive economy. Supporting further education organisations is compatible with national policy aims and the proposed economic vision for the city as a centre of excellence and world leader in higher education.
98. Policy in previous plans aimed to regulate the establishment of new schools alongside controls on teaching floorspace increases at permanent schools because of concerns about possible impacts on the local housing market and legacy policies in previous Structure Plan's and Local Plans towards selective management of service sector employment unrelated to sub regional needs
99. Experience with established schools has revealed that such controls upon increases in teaching floorspace are no longer effective in controlling growth in student numbers as classroom size, teaching hours, and length of course can boost throughput. An approach based on "student weeks" (add to glossary) ties in more closely with other national monitoring and licensing of language schools and would be a more effective way of regulating student throughput.
100. The industry has matured over the last 20 years and more and more courses are being run throughout the year and are being focused at a much broader range of student clientele.
101. The [Cambridge Cluster Study](#) has recognised the increasing contribution these establishments make to the local economy and has suggested a review in the policy approach as the schools between them contribute £78 million per annum to the local economy. The National Planning Policy Framework would support a policy approach which sought to take advantage of this benefit.

102. Many schools have been housing their teenage students with host families during the summer months, which also provide another source of income for local families and does not unduly cause pressures on the local housing market. Others are starting to take on more mature and business students, along with pre University entrance students wishing to improve their English. Most make use of independently provided student hostel accommodation to house their more mature students.
103. This can put pressure on the local housing market in Cambridge, if students are not accommodated in purpose built hostels or in lodgings with host families.
104. Existing schools should provide hostel accommodation for their students on site or off site and this should be controlled by a S106 legal agreement.
105. There is a need to continue to maintain a restriction on the establishment of new schools given land shortages within the City, intense housing pressures from other educational establishments and accepting there difficulties in being able to control temporary schools who can operate outside the planning system.

Findings of the Sustainability Appraisal of the Cambridge Local Plan (July 2013)

106. Policy 43 seeks to support University Faculty Development for the development or redevelopment of faculty, research and administrative sites for both the University of Cambridge and Anglia Ruskin University. The Universities are key drivers of economic growth in the sub region and this policy would allow the Universities to grow. Policy 44 allows for the development of existing and new specialist schools subject to criteria regarding accommodation, social and welfare facilities for non-local students. Policy 46 sets out the requirements for student housing that allows the Universities and specialist colleges to grow. Specialist colleges and language schools contribute £78m to the local economy and this policy allows them to grow and boost the local economy, whereas the previous Local Plan prevented the expansion of new language schools and specialist schools/tutorial colleges within Cambridge. As such, the plan would lead to significant positive effects in terms of economic growth at the Universities and specialist schools.
107. The appraisal also notes that the plan will capitalise on the value that language schools/specialist tutorial colleges contribute to the local economy, but balance this against the increased impact this may have on the housing market.

Key Issues raised during Proposed Submission consultation

Policy 44: Specialist Colleges and Language Schools	
Total Representations: 10	
Object: 7	Support: 3
Objections	<ul style="list-style-type: none"> • Private schools are a significant local employer, both of staff and also suppliers, contractors and consultants as well as supporting the local economy. Expansion of the built accommodation serving schools, as a matter of principle, must not be precluded by policy and instead dealt with on a site by site basis. For the plan to continue its current focus on higher, further and university education, at the expense of recognising the role of the entire education sector would be wrong; • The use of the word 'all' non local students within the policy is overly prescriptive and the reference to "ensure that the provision of accommodation is in step with the expansion of student places" should be deleted; • This policy discriminates against specialist colleges and language schools making it extremely difficult to develop; • The traditional approach to providing student accommodation suggested in the supporting text does not recognise the way the student accommodation market is evolving. This policy and policy 46 should recognise that there are other ways to provide student accommodation that may not fit the traditional model. This can play an important part in reducing the pressure on the Cambridge housing market but there must be flexibility built in to the policy wording to provide for this; • The proposed policy 44 in respect of language schools represents a relaxation of controls over such uses, when compared to the equivalent policy in the adopted Cambridge Local Plan 2006. It should be 'carried over' into the new plan; • This policy should state that there should be no more hostels in the area which is bounded by Mill Road, Station Road and Gonville Place; • The supporting text to this policy states "Use of family dwellings to accommodate students only is not appropriate". This should be amended to "will not be allowed" and make specific reference to the area which is bounded by Mill Road, Station Road and Gonville Place.
Support	<ul style="list-style-type: none"> • Good idea to house all students; • Specialist schools and language schools contribution to the city's economy is invaluable, students provide a great source of income for host families and spend money in the city year round. Enabling their growth (especially in central locations) will further benefit the local economy, e.g. by more students spending more money in local shops and businesses.

Minor Modifications suggested following Proposed Submission consultation and implications for Sustainability Appraisal

108. One minor modification is suggested relating to paragraph 5.32 of the supporting text to Policy 44: Specialist colleges and language schools in the Addendum to the Cambridge Local Plan 2014: Proposed Submission document. This change is labelled as PM/5/008 and reads:
“Language schools can place additional burdens on the housing market. This policy seeks to ensure that when specialist schools seek to grow, those burdens are mitigated. The applicant will need to demonstrate how many additional students will be generated by the proposal. This will allow the Council to judge the residential, social and amenity impact generated. The Council will ~~be flexible in considering any~~ require a robust method of calculating the additional number of students arising from any proposal, and will consider a range of mechanisms to agree an upper limit to the number of additional students. The range of mechanisms considered may include, but not be limited to, controlling the hours of operation, the number of desk spaces and the number of students. This will ensure that a proposal will generate a specific level of growth that can be measured and mitigated. Student accommodation is dealt with under Policy 46 in Section Six.”
109. The change suggested as PM/5/008 in the Addendum to the Cambridge Local Plan 2014: Proposed Submission document is not considered to impact on the findings of the Sustainability Appraisal.

AUDIT TRAIL: SECTION 6: MAINTAINING A BALANCED SUPPLY OF HOUSING

Policy 45: Affordable Housing and Dwelling Mix

EXISTING POLICY TO BE REPLACED (CAMBRIDGE LOCAL PLAN 2006)	OPTION(S) BEING TAKEN FORWARD FROM THE ISSUES AND OPTIONS REPORT (2012) AND ISSUES AND OPTIONS 2 (2013)	OPTION(S) NOT BEING TAKEN FORWARD FROM THE ISSUES AND OPTIONS REPORT (2012)
<ul style="list-style-type: none"> • 5/5 Meeting Housing Needs • 5/10 Dwelling Mix 	<ul style="list-style-type: none"> • Option 90: 40% or more Affordable Housing • Option 93: Lower qualifying threshold for Affordable Housing provision • Option 98: Tenure mix specified through the SHMA and Affordable Housing SPD • Option 99: Employment related housing • Option 100: Housing mix – General policy 	<ul style="list-style-type: none"> • Option 91: Proportion of Affordable Housing – 50% or more • Option 94: Maintain current threshold for Affordable Housing provision • Option 92: Proportion of Affordable Housing – 30% or more • Option 97: Specified Tenure Mix • Option 101: Housing mix –specific levels policy

Key issues raised during Issues and Options (2012) and Issues and Options 2 (2013) consultations:

SECTION OF THE ISSUES AND OPTIONS REPORT (201)	KEY ISSUES ARISING FROM CONSULTATION
Option 90: 40% or more Affordable Housing	<ul style="list-style-type: none"> • General support for this approach, which is well established; • Concern that insufficient affordable housing would be delivered; • Concern was expressed about the impact on viability.
Option 91: Proportion of Affordable Housing – 50% or more	<ul style="list-style-type: none"> • Support for a higher percentage than the existing 40% approach; • Concern that insufficient affordable housing would be delivered; • Concern was expressed about the impact on viability.
Option 92: Proportion of	<ul style="list-style-type: none"> • Concern was expressed that 30% would be insufficient to meet local need.

SECTION OF THE ISSUES AND OPTIONS REPORT (201)	KEY ISSUES ARISING FROM CONSULTATION
Affordable Housing – 30% or more	
Option 93: Lower qualifying threshold for Affordable Housing provision	<ul style="list-style-type: none"> • Need to reduce the threshold to deliver more affordable housing; • A threshold of 10 dwellings was suggested; • Concern was expressed about the impact on viability.
Option 94: Maintain current threshold for Affordable Housing threshold	<ul style="list-style-type: none"> • Need to reduce the threshold to deliver more affordable housing; • Insufficient affordable housing has been delivered under the current approach;
Question 9.3: Should there be any other variants to this, for example, where schemes have less than 15 dwellings, the proportion of affordable housing sought might be less than 40%?	<ul style="list-style-type: none"> • Smaller sites should be subject to a lower percentage of affordable housing, e.g. 20 – 30%; • A tiered approach dependent on the size of the site; • More self-build or community building; • No, as this would diminish delivery of smaller sites; • 40% should be the norm, unless proven that the development is not viable.
Question 9.4: Do you agree with the approach to clustering affordable housing, or do you feel an alternative approach would be more suitable?	<ul style="list-style-type: none"> • Reducing clustering would help community cohesion; • Clustering can have related management issues; • Clustering can affect the viability of developments.
Option 97: Specified Tenure Mix	<ul style="list-style-type: none"> • The minimum of 75% of the 40% to be housing for rent should be retained; • This would place added constraints on the market.
Option 98: Tenure mix specified through the SHMA and Affordable Housing SPD	<ul style="list-style-type: none"> • Tenure mix should not be set out in the Local Plan since flexibility is required to take account of changes in housing requirements and also other factors such as funding provision and Central Government specifications.
Option 99: Employment related housing	<ul style="list-style-type: none"> • Option 99 could help prevent new housing simply being taken by London commuters; • Encourages local working; • What happens when a person in employment related housing leaves the employer?; • Many people prefer to live away from their work;

SECTION OF THE ISSUES AND OPTIONS REPORT (201)	KEY ISSUES ARISING FROM CONSULTATION
	<ul style="list-style-type: none"> • Opposed to the creation of enclaves; • There is clearly a need for affordable housing provision, but there is a lack of evidence that locally specific circumstances exist to require employment related housing; • It is important to explore the possibility of specific institutions and employers providing housing specifically for their staff, particularly for the University and its colleges; • It would need to ensure that low paid employees were not excluded from this housing; • It should be secondary to enforcing the provision of affordable housing; • Disincentive to economic development and growth; • Need to specify key worker housing; • Should not negate need for affordable housing; • College employees should be included if housing is provided by University of Cambridge; • A % of affordable housing should be given over to key workers and University and College workers should be included on a list of key workers.
Option 100: Housing mix – General policy	<ul style="list-style-type: none"> • Option 100 is preferable to Option 101 as it would allow local circumstances, needs and the housing market to determine the appropriate mix on each site; • Support, but need to avoid high density and very tall buildings; • Strong vision for an area is needed, developed in close consultation with residents.
Option 101: Housing mix –specific levels policy	<ul style="list-style-type: none"> • Support, but need to encourage 3 bed dwellings or more for families; • Support more provision suitable for the elderly; • Support, but need minimum unit sizes; • Support provision of housing cooperatives; • Support, but need to avoid high density and very tall buildings; • Option 100 is preferable to Option 101 as it would allow local circumstances, needs and the housing market to determine the appropriate mix on each site; • It would lead to poor design; • The detail in the policy is critical – the character of the site and area, the market and the Strategic Housing Market Assessment are vital;

SECTION OF THE ISSUES AND OPTIONS REPORT (201)	KEY ISSUES ARISING FROM CONSULTATION
	<ul style="list-style-type: none"> • General approach is supported, with the mix in developments determined at the point of planning permission, responding to the market, local need and viability; • Should ensure adequate unit sizes, including provision of sufficient 3 bed + units; • The types of accommodation on sites depends on location. It would be preferable to retain flexibility; • The mix of housing must not lead to high density or high rise; • There is a need to understand who needs what size dwelling in Cambridge; • Mix is a key lever for affordable housing; • Properties should be based on size, not number of bedrooms; • Need for more family housing; • Need for housing for the elderly; • Occupancy levels are important; • Space standards are vital.
NEW OPTIONS ARISING FOLLOWING COMMUNITY INVOLVEMENT	
No additional options have been suggested.	

Evidence base:

- Cambridge City Council (2008) Affordable Housing SPD;
- Cambridge City Council (2012) Housing Strategy 2012 –2015;
- The Cambridge Sub-region Strategic Housing Market Assessment (2008 and updates);
- Cambridge City Council (2009) Advice Note – Deleted Local Plan Policies;
- University of Cambridge (2011) North West Cambridge Key Worker Housing Statement;
- University of Cambridge (2008) Housing Needs Study (submitted as part of the North West Cambridge Area Action Plan examination);
- Dixon Searle (2013) Cambridge City Council Local Plan – Community Infrastructure Levy Viability Assessment;
- Dixon Searle (2013) Cambridge City Council Local Plan - SHLAA and Potential Site Allocations High Level Viability Assessment.
- Dixon Searle (2013) Small Sites Affordable Housing Viability Assessment;
- Cambridgeshire County Council (2013) Monitoring data for residential development 2007/2008 to 2011/2012.

How the policy came about:

What is Affordable Housing?

1. Affordable Housing is housing provided for people whose income levels mean they cannot access suitable market properties to rent or buy locally to meet their housing needs. It includes: Social Rented; Affordable Rent; and a range of intermediate housing tenures (including Shared Ownership, Equity Share, and Intermediate Rent).
2. Government guidance states that Affordable Housing should:
 - Meet the needs of eligible households including availability at a cost low enough for them to afford, determined with regard to local incomes and local house prices; and
 - Include provision for the home to remain at an affordable price for future eligible households or, if these restrictions are lifted, for the subsidy to be recycled for alternative Affordable Housing provision.
3. In terms of the different forms of Affordable Housing, social rented housing is owned and managed by local authorities and registered social landlords, for which guideline target rents are determined through the national rent regime. It may also include rented housing owned or managed by other persons and provided under equivalent rental arrangements to the above, as agreed with the local authority or with the Homes and Communities Agency as a condition of grant. Target social rents are set using a formula, which considers property prices and average manual earnings, both weighted for the geographical location of the housing stock. The Government has announced that a new social rent policy, which will include arrangements for setting and reviewing rent levels up to 2025 will be included in the next spending review. The national definition of Affordable Housing was revised in June 2011 and a new tenure type was added - Affordable Rent - which is a form of rented rather than intermediate housing. Affordable Rents are not subject to the same prescriptive rent control as Social Rented Housing. Affordable Rents can be set by the Registered Provider at no more than 80% of local market rents. Under current guidance, with very few exceptions, all new Government grant for rented Affordable Housing allocated by the Homes and Communities Agency from April 2011 to March 2015 will require new housing to be let at Affordable Rents rather than Social Rents. It is also noted that Homes and Communities Agency grant will not be available for new Affordable Housing delivered under S106 planning agreements.
4. Intermediate Affordable Housing is housing at prices and rents set above those of social rent, but below market price or rents (not including Affordable Rent) and, which meet the criteria set out for Affordable Housing. These can include shared equity products (e.g. HomeBuy), other low cost homes for sale and intermediate rent.

Making Affordable Housing Provision

5. Paragraph 47 of the National Planning Policy Framework asserts that local planning authorities should ensure that their local plan meets the full, objectively assessed needs for market and Affordable Housing in the housing market area, as far as is consistent with the policies set out in this Framework. In Cambridge, though, there is a tension between the requirement set out in the National Planning Policy Framework and the ability to fully meet affordable housing need.
6. Paragraph 50 of the National Planning Policy Framework states that local planning authorities should deliver a wide choice of high quality homes, widen opportunities for home ownership and create sustainable, inclusive and mixed communities. They should do this by planning for a mix of housing, identifying the size, type, tenure and range of housing that is required in particular locations, reflecting local demand; and where the local authority has identified that Affordable Housing is needed, set policies for meeting this need on site, unless off-site provision or a financial contribution of broadly equivalent value can be robustly justified (for example to improve or make more effective use of the existing housing stock) and the agreed approach contributes to the objective of creating mixed and balanced communities. Such policies should be sufficiently flexible to take account of changing market conditions over time.
7. The availability of Affordable Housing in Cambridge to meet housing need is a key issue. It is also vital in supporting economic growth, and promoting and improving the health and wellbeing of Cambridge residents. The Council's Housing Strategy 2012 - 15 identifies the need to maximise the delivery of new Affordable Housing in a range of sizes, types and tenures to meet a range of housing needs, as part of delivering balanced, mixed and inclusive communities.
8. The Strategic Housing Market Assessment sets out the annual need for 2,140 new Affordable Homes per year over the five years between 2009/10 and 2013/14 to deal with existing and newly arising housing need and then 592 per annum thereafter up to 2027/28. The Strategic Housing Market Assessment is in the process of being updated, and these figures may be subject to change. The Affordable Housing need in Cambridge is therefore much greater than the level of housing that can ever be fully met. Affordable Housing in Cambridge is provided by the Council and a number of Private Registered Providers (Housing Associations). Over the last 15 to 20 years, new Affordable Housing has been provided mainly by Housing Associations (Private Registered Providers), but the Council has now agreed a programme to deliver its own Affordable Housing. Government grant has been secured for the Council to build 146 new Affordable Homes in a mix of Affordable Housing tenures over the next three years. This includes the replacement of old, unpopular and difficult to manage housing stock with more modern accommodation, as well as providing additional new homes

9. In view of the high level of housing need in Cambridge, Policy 5/5 of the Cambridge Local Plan 2006 is concerned with the provision of Affordable Housing, establishing thresholds and targets for provision and accepting that the actual provision will be for negotiation taking into account viability, any particular costs associated with the development and whether there are other planning objectives which need to be given priority. The policy states that the Council will seek as Affordable Housing 40% or more of the dwellings or an equivalent site area as part of new residential developments which are either on sites of over 0.5 hectares or can deliver 15 or more dwellings. Annual monitoring of Policy 5/5 of the Cambridge Local Plan 2006 and the delivery of Affordable Housing over the past seven years has shown that qualifying development sites have been delivering 40% Affordable Housing consistently since the Cambridge Local Plan 2006 was adopted. Whilst this approach has contributed to providing more Affordable Housing in Cambridge, and has been tested at appeal, most notably in relation to urban extensions at Clay Farm and Glebe Farm on Cambridge's southern fringe, the evidence suggests that there is still a need to provide more than this approach has achieved to date. In April 2012, there were 8,210 applicants on the Council's Housing Register. This showed an increase of around 1,500 applicants since March 2011. All applications on the register have been reviewed and these numbers are expected to have changed. Furthermore, the ratio of average house prices to average earnings has remained fairly stable over the three years to 2012, standing at 9.2 in 2012. Despite the wider economic climate, Cambridge has not seen a reduction in house prices or private rent levels. With a relatively young mobile workforce and a growing student population, demand for the private rented sector remains high.
10. The National Planning Policy Framework states that where there is an identified Affordable Housing need, councils should set policies for meeting this on-site unless off-site provision or a financial contribution can be justified. Within the options on Affordable Housing in the Issues and Options Report (2012), there were three options which set out the potential to require the delivery of 30%, 40% or 50% or more Affordable Housing within new residential developments. Given the interim findings on viability, it was agreed at Development Plan Scrutiny Sub Committee in February 2013 that Option 90 would be pursued, which requires 40% or more Affordable Housing.

Threshold for Affordable Housing

11. In view of the high level of housing need in Cambridge, Policy 5/5 of the Cambridge Local Plan 2006 on the provision of Affordable Housing, also established the threshold for provision. The policy states that the council will seek as Affordable Housing 40% or more of the dwellings or an equivalent site area as part of new residential developments, which are either on sites of over 0.5 hectares or can deliver 15 or more dwellings. Since the policy was implemented, a number of schemes have come forward in Cambridge, which

have delivered Affordable Housing on sites accommodating 15 or more dwellings. However, a significant number of sites have also come forward which provide for less than 15 dwellings and do not contribute towards Affordable Housing. To exemplify this for schemes between 10 and 14 units, the table below sets out the number of schemes of 15 or more units and between 10 and 14 units, which have been approved within five monitoring years since the adoption of the Cambridge Local Plan 2006. The monitoring year 2006/07 was not used as a number of schemes permitted using the 1996 Local Plan parameters were monitored in this year. Reserved matters applications were also excluded from the table, as the commitment to deliver Affordable Housing had been made at outline stage in all applications.

12. Whilst the number of applications approved for over 15 units appears low when considered in purely numeric terms, it should be noted that some of the approved schemes were outline applications for the development of hundreds of homes in the urban extensions to Cambridge. However, it should also be noted that a number of schemes came forward just under the existing threshold for between 10 and 14 units, which did not deliver any Affordable Housing due to the current threshold of 15 units. Furthermore, a number of the sites identified in the Strategic Housing Land Availability Assessment and anticipated on windfall sites (using sites delivered between 1999 and 2011 as a guide) would deliver schemes of between 10 and 14 units.

Table 1: Commitments for over 15 units and between 10 and 14 units from 2007 to 2012 (source: Cambridgeshire County Council)

Monitoring Year	No. of schemes over 15 units approved	% of schemes over 15 units with 40% Affordable Housing or more	No. of schemes of between 10 and 14 units
2011/12	2	100%	5
2010/11	4	100%	3
2009/10	2	100%	5
2008/09	4	100%	5
2007/08	3	66.6%	2

13. Furthermore, in addressing housing need, the council also considered the opportunity to lower the threshold on Affordable Housing to include less than 10 unit schemes. Assessment of the number of applications approved between 2007 and 2012 showed that over 700 units were approved within over 300 applications for between 1 and 9 units. The number of schemes approved is shown in Table 2 overleaf.

Table 2: Commitments for between 1 and 9 units from 2007 to 2012 (source: Cambridgeshire County Council)

Scheme Size	Number of schemes per Monitoring Year					Total number of schemes	Total number of units
	2007/2008	2008/2009	2009/2010	2010/2011	2011/2012		
1 unit	42	53	34	26	35	190	190
2 units	9	21	11	9	5	55	110
3 units	8	1	1	1	8	19	57
4 units	3	7	5	4	2	21	84
5 units	3	3	1	4	3	14	70
6 units	3	3	2	2	2	12	72
7 units	0	3	1	2	0	6	42
8 units	4	2	1	1	0	8	64
9 units	0	2	1	0	1	4	36
Total	72	95	57	49	56	329	725

14. In order to inform the development of the council's Affordable Housing policy position in the light of the level of housing need, the council commissioned consultants to carry out a high level assessment of the likely potential for the provision of Affordable Housing on smaller sites than currently required through the adopted Cambridge Local Plan 2006 (15 units). This may be either through on-site provision of affordable housing or via a financial contribution mechanism.
15. The council's Small Sites Affordable Housing Viability study (2013) tested a range of affordable housing options on sites of between 2 and 14 dwellings by running development appraisals on a variety of development scenarios or site typologies that reflect the nature of development coming forward across the city. These scenarios reflected and added to those tested within the earlier viability reports for the council. This enabled testing of the impact of affordable housing both through on-site provision and via a financial contribution mechanism. As a key part of the process, viability was also considered over a range of values ('value levels') evidenced by research, so that it could be assessed how viability varies with location within the city and could also change over time taking into account variations in market conditions.
16. It is important that the council's policies do not deter development through unduly reducing the supply of land brought forward for residential development more widely. Any policy must balance delivery of affordable housing and planning obligations with maintaining sufficient incentive (reasonable land value levels) for landowners to release land – allowing developers to promote and bring forward schemes.

17. The study found that smaller developments are not necessarily any less or more viable than larger ones – site size alone is not a determinant of viability. A wider range of factors come together to influence scheme viability and a practical approach by the council could be responsive to these whilst contributing by way of an important additional housing enabling funding stream. However, it is often difficult to integrate on-site Affordable Housing into smaller sites, due to the fraction of whole Affordable Housing units being delivered or design and management issues.
18. Mathematically, the study states that the viability results are potentially strong enough to allow for the provision of 10% affordable housing; but possibly not quite strong enough for 20% on sites accommodating between 2 and 9 units (the relevant part of the range modelled). This also takes into account the likely introduction of a CIL payment (tested here at £125/m²). At 10%, the financial contributions route (rather than on-site) would be most appropriate as it is not possible to provide on-site affordable housing in real terms at this level (i.e. 10% of 5 units is 0.5 units).
19. The study also notes that on sites providing 10 - 14 units, between 20% and 30% provision of affordable housing should be sought. It notes that the council's CIL study stated: *"We would strongly recommend the consideration of a lower affordable housing target if to be placed on developments of a reduced size compared with the current threshold. In the event of developing policy in this area, the affordable housing target should be no higher than 30 and in fact the positive viability benefits of a 20 level can be seen in comparison with that too"*.
20. The consultants suggest that whilst the council should aim to achieve affordable housing on-site for developments delivering 10 - 14 units, financial contributions could also be used. This would give rise to the question of how fractions of units would be dealt with, e.g. a 13 unit scheme providing 3.25 affordable housing units at 25% affordable housing.
21. In the Issues and Options Report (2012), there were two options given on thresholds for Affordable Housing. The approach agreed at Development Plan Scrutiny Sub Committee in February 2013 was to pursue option 93, which lowers the qualifying threshold for Affordable Housing. A lower threshold will potentially increase the overall supply of Affordable Housing, and for this reason, the lowering of the threshold was generally supported by respondents to the Issues and Options consultation (2012).
22. As with any threshold, however, there is always the risk that developers look to artificially lower the number of units to be delivered on a particular site in order to avoid crossing the Affordable Housing threshold and that the difference of one extra dwelling could trigger the requirement for 40% Affordable Housing with an associated significant impact on viability. This could be avoided to an extent by stating within the policy that the artificial

subdivision or amalgamation of sites with the intention of subverting this policy will not be permitted. Furthermore, if the threshold is lowered too significantly, there is the risk that Registered Social Landlords find sites with very small numbers of Affordable Housing difficult to manage. In lowering the threshold, the balance needs to be struck between meeting housing need, maintaining effective management of Affordable Housing and continuing to deliver well-designed developments of appropriate density for their context.

23. Viability testing considered the impact of lowering the threshold of 40% Affordable Housing requirements to cover developments of between 2 and 14 units. It was established that the Council's viability testing allowed for the following thresholds and percentages of Affordable Housing should be set within the policy:

- Sites with capacity for between 2 and 9 dwellings should provide for a minimum of 10 per cent affordable housing;
- Sites with capacity for between 10 and 14 dwellings or on sites of between 0.3 and 0.49 hectares should provide for a minimum of 25 per cent affordable housing on-site;
- Sites with capacity for 15 dwellings or more or on sites of 0.5 hectares or more should provide for a minimum of 40 per cent affordable housing on-site.

24. Paragraph 173 of the National Planning Policy Framework is clear that the sites and scale of development identified in the Local Plan should not be subject to such a scale of obligations and policy burdens that their ability to be developed viably is threatened. It states that:

“In order to ensure viability, the costs of any requirements for affordable housing, standards, infrastructure contributions or other requirements should, when taking account of the normal cost of development and mitigation, provide competitive returns to a willing landowner and willing developer to enable the development to be deliverable.”

25. The potential impacts of this policy on viability have been taken into account in a suite of viability documents produced on behalf of the Council. These are the Cambridge City Council Local Plan – Community Infrastructure Levy Viability Assessment; the Cambridge City Council Local Plan - SHLAA and Potential Site Allocations High Level Viability Assessment; the Cambridge City Council Local Plan – Student Housing Affordable Housing Study; and the Cambridge City Council Local Plan – Small Sites Affordable Housing Viability Study.

Clustering of Affordable Housing

26. The council's current Affordable Housing Supplementary Planning Document (2008) sets out clustering as:

"Clustering, which is the development of the Affordable Housing in multiple groups normally of between 6 and 25 dwellings depending upon the size and design of the development and the nature of the Affordable Housing. In flatted schemes no more than 12 affordable dwellings should normally have access from a common stairwell or lift. Clustering is the usual approach that is followed in Cambridge. The Affordable Housing should be provided in prominent parts of a site to aid integration."

27. Within the Issues and Options report (2012) a question was posed regarding the clustering of Affordable Housing and whether to continue the current approach to clustering. The layout of a development should integrate Affordable Housing with the open market housing in ways that minimise social exclusion and improve community cohesion, but also continue to allow effective management by the relevant Registered Provider. The plan itself does not refer to clustering as this is an internal housing management issue to be covered if necessary in the Affordable Housing Supplementary Planning Document. The plan rather focuses on ensuring that the external appearance of Affordable Housing is the same as general market housing.

Tenure Mix

28. In accordance with the National Planning Policy Framework, the council encourages a mix of tenures to be provided as part of new development. With high levels of need for rented housing identified through the housing register, the council currently resolves to achieve that 75% of the Affordable Housing on qualifying sites should be Social Rented Housing and 25% Intermediate Housing. This is set out in the council's Affordable Housing Supplementary Planning Document (January 2008), which provides additional detail supporting policies in the Cambridge Local Plan 2006.
29. Work on the Strategic Housing Market Assessment and the council's Housing Strategy has identified that there is a growing group of people unlikely to be able to have sufficient priority to access Social or Affordable Rented homes, but who are also unable to afford to purchase on the open market. Intermediate housing can help to provide for people in this group.
30. Given the local need to provide housing across different tenures, the council's Issues and Options report (2012) addressed this issue by setting out options 97 and 98 on tenure mix. Option 98 was supported at Development Plan Scrutiny Sub Committee in February 2013. The policy will allow for greater flexibility, by stating the need to consider tenure mix, making reference to the Strategic Housing Market Assessment and the council's Affordable Housing

Supplementary Planning Document. Both the Strategic Housing Market Assessment and the council's Affordable Housing Supplementary Planning Document are capable of being updated more regularly than the local plan to reflect changing circumstances, including the ongoing impact of Affordable Rents and fundamental reforms to the welfare system, including Universal Credit.

Housing Mix

31. In accordance with the National Planning Policy Framework (paragraph 50), it is important that new residential development provides a good mix of size and type of dwellings to meet a range of needs. Development of a mix of different dwelling sizes, types and tenures will assist in the creation and maintenance of mixed, inclusive and sustainable communities. Such policies at a local level should be sufficiently flexible to take account of changing market conditions over time.
32. Currently, Policy 5/10 Dwelling Mix within the Cambridge Local Plan 2006 states that on sites of 0.5 ha or more or 15 dwellings or more, residential developments will be expected to provide a mix of dwelling sizes based on the number of bedrooms. The policy does not set any proportions for mix. However, Annex 2 to the Affordable Housing Supplementary Planning Document includes key findings from the Strategic Housing Market Assessment, which sets out a guide for new Affordable Housing provision. It goes on to note that the guidance "...will also be a material consideration in the determination of planning applications for the market housing element..." (Cambridge City Council, 2008, p5).
33. The guidance in Annex 2 of the Affordable Housing Supplementary Planning Document sets out the following mix: 50% 1 and 2 bedroom dwellings, but with no more than 10% 1 bed dwellings, 50% 3 bedroom or larger dwellings, but with no less than 20% 3 bed dwellings. Annex 2 of the Affordable Housing Supplementary Planning Document is caveated by reference to the site size, location and previous decisions.
34. The council's recently produced Housing Strategy 2012-15 recognises that there is a tension between the higher levels of absolute need for one and two bedroom homes amongst applicants on the housing register, the relatively high level of existing supply of smaller homes, and the need to create a balanced and mixed communities and provide larger homes to enable families to grow without having to move on again. Sizes of homes and occupancy rates affect the infrastructure required, including levels of need for school places and health service provision. Welfare reforms restricting housing benefit to those under-occupying their homes may also affect the size of homes needing to be built in the future, although the council will still want to balance this with a need for mixed and balanced communities.

35. Within the Issues and Option report (2012) of the Local Plan Review, two options were put forward for consultation on housing mix. Option 100 suggested a general policy on housing mix with more detailed advice provided through the Strategic Housing Market Assessment and the council's new Affordable Housing Supplementary Planning Document, whilst Option 101 suggested setting specific levels within the policy itself.
36. Following agreement at Development Plan Scrutiny Sub Committee in February 2013, pursuing Option 100 will enable flexibility to adapt to any future changes in circumstances in the wider economy and in the local housing market. This is noted in the Sustainability Appraisal of the Issues and Options Report and recognises that updates to the Strategic Housing Market Assessment and the council's Affordable Housing Supplementary Planning Document can reflect and allow for changes in local housing need more frequently and more regularly than through formal plan-making. The sub-regional Strategic Housing Market Assessment is currently being updated and it is proposed that the council's Affordable Housing Supplementary Planning Document is updated to reflect and complement the new local plan. Consideration should also be given to the need to express the housing mix across all tenures and whether to differentiate between houses and flats. The dwelling size would be measured by the number of bedrooms provided.

Employment Related Housing

37. In terms of previous policy development relating to this issue, Policy 5/6 of the Cambridge Local Plan 2006 set out the requirement for proposals for employment development, which impact on the demand for affordable housing, to provide Affordable Housing on-site; contributions towards off-site housing or by means of key worker housing provision. This policy was deleted after the application to the Secretary of State to save the policies of the Cambridge Local Plan 2006 because it was recognised at the Examination in Public for the Regional Spatial Strategy for the East of England that there was an absence of convincing evidence that specific local circumstances existed to justify the imposition of the requirement. Deleted Policy 5/6 was worded in a negative manner, requiring mitigation of impacts on Affordable Housing provision as a result of new employment development.
38. The council included Option 99 Employment related housing in the Issues and Options report (2012). This option set out the development of a specific policy, which encourages the provision of housing for employees in Cambridge. Generally, this option was supported by respondents, particularly the University of Cambridge and the Bursars' Committee. The key difference between the deleted Policy 5/6 of the Cambridge Local Plan 2006 and Option 99 of the Issues and Options report is in the positivity of wording. Whilst Option 99 seeks to encourage housing provision for specific employers within the city, who have a demonstrable need for housing for their employees, the deleted 2006 Local Plan policy required mitigation of impacts on Affordable

Housing provision as a result of employment development within the city. Direct action by local employers may help alleviate the existing pressures of the housing market in Cambridge as it could take a number of people out of the private rented sector and off the Housing Register.

39. In order to allow any provision of employment related housing, the applicant would need to demonstrate that there is a proven need for such housing that cannot be met by the housing market and that, in the absence of this new housing provision, the provision of their business/services would suffer. The planning application for employment related housing would be required to have an allocations policy identifying the range of employees within their institution. This allocations policy would also form part of a S106 agreement.

Findings of the Sustainability Appraisal of the Cambridge Local Plan (July 2013)

40. The findings of the Sustainability Appraisal of the draft Cambridge Local Plan note the graduated approach to the percentage of affordable housing required from new residential developments is adopted by the Policy, with this being based upon what is considered to be viable for most schemes of particular sizes in the City. Through this approach, developments of between 2 and 9 units will be required to provide a minimum of 10% affordable housing, developments between 10 and 14 units are to provide a minimum of 25% affordable housing, and developments of 15 or more units will need to provide a minimum of 40% affordable housing. This represents an improvement on the affordable housing policy contained within the Cambridge Local Plan 2006, which only applies to sites of 15 or more dwellings. As such the policy should lead to positive effects in relation to community and wellbeing, representing an improvement on the current situation in which many smaller sites make no contribution towards affordable housing provision. The possibility of setting a higher policy requirement (50% on sites of 15 or more dwellings) was considered as part of viability assessment¹, but this would not be considered to be viable.
41. The Interim Sustainability Appraisal suggested the need to seek to achieve as high a percentage of Affordable Housing as possible; however, viability was a key determinant when selecting a preferred approach. Given the council's findings on viability, it was agreed at Development Plan Scrutiny Sub Committee in February 2013 that the preferred approach is to require 40% or more Affordable Housing units (on sites of 15 units or more). However, the qualifying threshold for affordable housing has been lowered and a staggered

¹ The potential impacts of this policy on viability have been taken into account in a suite of viability documents produced on behalf of the Council. These are the Cambridge City Council Local Plan – Community Infrastructure Levy Viability Assessment; the Cambridge City Council Local Plan - SHLAA and Potential Site Allocations High Level Viability Assessment; and the Cambridge City Council Local Plan – Student Housing Affordable Housing Study and the Small Sites Affordable Housing Viability Study

approach to affordable housing proposed in recognition of housing need across the city.

42. On housing mix, the approach to specifying tenure and dwelling mix through the Affordable Housing Supplementary Planning Document was supported at Development Plan Scrutiny Sub Committee in February 2013 and is in line with the findings of the interim SA. The policy will allow for greater flexibility, by stating the need to consider tenure mix, making reference to the Strategic Housing Market Assessment and the council's Affordable Housing Supplementary Planning Document. Both the Strategic Housing Market Assessment and the council's Affordable Housing Supplementary Planning Document are capable of being updated more regularly than the Local Plan to reflect changing circumstances, including the ongoing impact of Affordable Rents and fundamental reforms to the welfare system.

Key Issues raised during Proposed Submission consultation

Policy 45: Affordable housing and dwelling mix	
Total Representations: 23	
Object: 17	Support: 6
Objections	<ul style="list-style-type: none"> • The plan will not provide enough scope to meet the housing need, particularly the affordable housing need; • The policy will have negative implications for the delivery of housing due to viability issues, particularly on small brownfield sites within the city and sites in lower value areas; • Policy should be rephrased for clarity and to allow for viability of specific sites to be considered, as it is currently contrary to paragraph 173 and 174 of the NPPF; • Affordable housing policy simply results in market housing being more expensive and less available; • Retain current threshold of 40% and 15 units; • 40% requirement is too high; • Affordable housing requirements must be enforced; • 10% requirement for 2 to 9 units of housing development risks damaging social diversity; • The desired mix, size and tenure for housing should be defined; • Staged strategy for larger sites should be set out; • Overall planning obligations should be clearly stated; • Single and clear determination method is required; • The term 'on-site' is confusing and is used repeatedly in the policy; • Clarification required that the exceptional circumstances include viability issues; • No justification for paragraph 6.7 to refer to employment

	proposals.
Support	<ul style="list-style-type: none"> • It is important to provide affordable housing within the city for people to live close to places of work; • Need to close any loopholes where developers subdivide sites to avoid affordable housing requirements; • The approach does not require employment development to provide affordable housing but would allow it to come forward. This approach is supported on the basis there is flexibility; • Approach is supported and must be enforced.

Minor Modifications suggested following Proposed Submission consultation and implications for Sustainability Appraisal

43. As a result of assessment, three minor modifications are suggested for Policy 45: Affordable housing and dwelling mix and paragraphs 6.3 and 6.5 of the supporting text. These changes are in the Addendum to the Cambridge Local Plan 2014: Proposed Submission document marked as PM/6/001, PM/6/002 and PM/6/003.

44. For clarity and in response to a representation (Representation Number 27134), PM/6/001 suggests that Policy 45 reads:

~~Planning permission will only be granted for residential development on sites with capacity for between 2 and 9 dwellings, if provision is made for a minimum of 10 per cent affordable housing. On such sites, financial contributions towards affordable housing off-site are considered acceptable. This does not prohibit on-site provision of affordable housing on sites of this scale, but recognises that circumstances may often not allow for delivery on-site.~~

~~Planning permission will only be granted for residential development on sites with capacity for between 10 and 14 dwellings or on sites of between 0.3 and 0.49 hectares, if provision is made for a minimum of 25 per cent affordable housing on-site.~~

~~Furthermore, planning permission will only be granted for residential development on sites with capacity for 15 dwellings or more or on sites of 0.5 hectares or more, if provision is made for a minimum of 40 per cent affordable housing on-site.~~

Planning permission will only be granted for residential development on sites where the minimum percentage of affordable housing has been secured on site in line with the thresholds and percentages set out in the table below:

<u>No. of dwellings</u>	<u>Minimum percentage of affordable housing required</u>
<u>2 -9 units</u>	<u>10%</u>
<u>10-14 units</u>	<u>25%</u>
<u>15 or more units</u>	<u>40%</u>

On sites capable of delivering between 2 and 9 dwellings, financial contributions towards the provision of affordable housing off-site are considered acceptable. This does not prohibit on-site provision of affordable housing on sites of this scale, but recognises that circumstances may often not allow for delivery on-site.

Where it appears that a larger site has been subdivided into smaller development parcels in order to circumvent the requirements of this policy, or for any other reason, the threshold and the pro-rata percentage of affordable housing sought will apply to the requirement from the larger area as a whole. The required density on a given site will need to have regard to its wider context and other policies of this plan.

The occupation of affordable housing will be limited to people in housing need and shall be available in perpetuity. Affordable housing shall be provided on development sites with the capacity of 10 dwellings or more in accordance with the percentages and thresholds set out above unless exceptional circumstances are demonstrated. Where affordable housing is provided, it shall be of tenure blind design indiscernible from and well integrated with the general market housing.

Developments should include a balanced mix of dwelling sizes*, types and tenures to meet projected future household needs within Cambridge. The mix of dwellings and tenure types shall have regard to the differing needs for different unit sizes of affordable housing and market housing. ~~and to the council's Affordable Housing Supplementary Planning Document in force at the time planning permission is applied for.~~

All sites including employment related housing will be required to make affordable housing provision in line with the thresholds and percentages set out above.

Further details on the practical implementation of this policy will be set out in an up to date Affordable Housing Supplementary Planning Document.

*Measured by the number of bedrooms to be provided in each dwelling.

45. For clarity, PM/6/002 suggests that paragraph 6.3 reads:

“With a strong economy, Cambridge is at the centre of an area of significant housing growth planned for the coming years. With high housing costs but only limited land available for housing, the city also has a strong housing need. The council recognises that meeting housing need is a key priority. However, following assessment of development viability across the city, the affordable housing requirement is not applied to planning applications for student accommodation.”

46. For clarity, PM/6/003 suggests that paragraph 6.5 reads:

“The council has adopted this approach to overcome concerns about the number of planning applications coming forward in the city below the previously adopted affordable housing threshold of 15 dwellings. However, it is noted that the introduction of single percentage for affordable housing at a lower threshold than 15 dwellings could make schemes less viable or unviable and could reduce the amount of housing delivered. A graduated approach towards affordable housing requirements, starting at lower site size thresholds and percentages, is considered more appropriate. Where applications are made for outline planning permission, a planning obligation will be required to secure affordable housing in accordance with the thresholds and percentages in the policy.”

47. Following consideration of the impact of these changes on the Sustainability Appraisal Framework, it has been concluded that these changes do not materially alter the findings of the Sustainability Appraisal.

Policy 46: Development of Student Housing

EXISTING POLICY TO BE REPLACED (CAMBRIDGE LOCAL PLAN 2006)	OPTION(S) BEING TAKEN FORWARD FROM THE ISSUES AND OPTIONS REPORT (2012) AND ISSUES AND OPTIONS 2 (2013)	OPTION(S) NOT BEING TAKEN FORWARD FROM THE ISSUES AND OPTIONS REPORT (2012)
<ul style="list-style-type: none"> • Policy 7/7 College and University of Cambridge Staff and Student Housing; • Policy 7/9 Student Hostels for Anglia Ruskin University; • Policy 7/10 Speculative Student Accommodation 	<ul style="list-style-type: none"> • Option 96 No Affordable Housing contribution from new student accommodation • Option 144 University of Cambridge staff and student housing; • Option 148 Anglia Ruskin University- 	<ul style="list-style-type: none"> • Option 95 Affordable Housing contribution for new student accommodation; • Option 145 Expand existing Colleges rather than plan for new colleges at North West Cambridge; • Option 147 Anglia

	<p>Support for student hostel development but removal of affordable housing exemption;</p> <ul style="list-style-type: none"> • Option 150 Speculative student hostel accommodation – widened to include other established educational institutions; • Option 151 Specialist Colleges such as secretarial colleges and tutorial colleges; • Option 152 Language schools 	<p>Ruskin University – Support for student hostel accommodation development with affordable housing exemption;</p> <ul style="list-style-type: none"> • Option 149 Speculative student hostel accommodation – limited to Anglia Ruskin University and the University of Cambridge.
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Key issues raised during Issues and Options (2012) and Issues and Options 2 (2013) consultations:

SECTION OF THE ISSUES AND OPTIONS REPORT (2012)	KEY ISSUES ARISING FROM CONSULTATION
Option 95: Affordable Housing contribution for new student accommodation	<ul style="list-style-type: none"> • Would contribute to overall need; • This option does not recognise that for a proportion of students it is their permanent home whilst at Cambridge • Would it really lessen pressure on housing stock?; • It could impact on viability, slowing down development; • Would place additional pressure on the housing market and upon the colleges/universities; • The policy should be restricted to require delivery of affordable housing from speculative developers.
Option 96: No Affordable Housing contribution from new Student Accommodation	<ul style="list-style-type: none"> • Would not place additional pressure on the housing market and upon the colleges/universities; • Students put pressure on the city's services and should contribute affordable housing
Option 144: University Of Cambridge staff and student housing	<ul style="list-style-type: none"> • Strong support for the option but it is not an alternative to Option 145; • Adequate housing for the University and Colleges is fundamental to their continuing success; • Support provided open character of colleges maintained; • Should acknowledge role of small HMOs;

SECTION OF THE ISSUES AND OPTIONS REPORT (2012)	KEY ISSUES ARISING FROM CONSULTATION
	<ul style="list-style-type: none"> • Change of Use Class C3 gives no protection to family housing; • Need to consider the needs of Higher and Further Education Sector as a whole not just the two Universities.
Option 145: Expand existing Colleges rather than plan for new Colleges at North West Cambridge	<ul style="list-style-type: none"> • The University supports growth in both locations in order to provide for student needs; • North West Cambridge is too remote from existing colleges. New colleges won't help existing colleges with their shortfall in student accommodation; • Some uncertainty whether new colleges would emerge at North West Cambridge
Option 147 Anglia Ruskin University – support for student hostel development with affordable housing exemption	<ul style="list-style-type: none"> • General support for this option – sites should be well located in relation to ARU's East Road campus
Option 148: Anglia Ruskin - Support for student hostel provision but remove affordable housing exemption	<ul style="list-style-type: none"> • Support the policy but it should not be confined to Cambridge University and Anglia Ruskin University; • Policy 7/9 has been successful; • Its time to reverse policy and push for more affordable housing; • Support but could allow a reduced affordable housing percentage on sites with hostels rather than no affordable housing provision; • Affordable housing is vital in Cambridge and should take priority over Anglia Ruskin University; • Removing the exemption will put more pressure on students to find accommodation in shared houses; • Some students like to live in shared houses as they feel more integrated within the community than is the case with hostels
Option 149: Speculative student hostel accommodation limited to ARU and Cambridge University	<ul style="list-style-type: none"> • It is inequitable to discriminate against non University Colleges; • Language Schools should not be excluded.
Option 150: Speculative student hostel	<ul style="list-style-type: none"> • Support, so additional student accommodation can be provided for other types of institution like Abbey College;

SECTION OF THE ISSUES AND OPTIONS REPORT (2012)	KEY ISSUES ARISING FROM CONSULTATION
accommodation widened to include other established educational institutions	<ul style="list-style-type: none"> • Support, other than the criteria for external amenity space which is difficult on brownfield sites; • Change needed as current policy inequitable; • It applies equally to specialist schools such as language schools; • Policy should include student and staff housing for these institutions.
Option 151: Specialist colleges such as secretarial and tutorial colleges	<ul style="list-style-type: none"> • Support introduction of new policy to enable specialist schools to provide financial and cultural benefits; • Language schools make an important contribution to the economy; • All specialist schools should be treated the same way.
Option 152: Language Schools	<ul style="list-style-type: none"> • Option 152 preferred provided large residential houses are not lost. Keep controls to prevent too many specialist schools opening; • Both types of school should provide adequate hostels; • Retain a policy on language schools but widen to include other types of school. Restrict as far as legally possible opening of other new schools; • It is inappropriate to refer to behaviour when considering whether a policy towards expansion is appropriate.

Evidence base:

- Dixon Searle (2013). Student accommodation – affordable housing financial contributions viability;
- Will Lusty (Savills) on behalf of the Bursars’ Committee (22nd January 2013). Land Needs Email;
- Survey of student housing need by University Of Cambridge College Bursars Committee April 2012;
- Student Statistics 2011-12 –Cambridge University Planning and Resource Allocation Office;
- HESA data (2010/2011);
- Anglia Ruskin University Hostel Provision Table. Anglia Ruskin University (13th April 2012);
- The Cambridge Sub-region Strategic Housing Market Assessment (2008 and updates)
- Oxford City Council Core Strategy Inspectors Report (2010);
- Survey of student housing need by University Of Cambridge College Bursars Committee April 2012;
- SQW (2011). Cambridge Cluster Study 2011;

- EFL Services Ltd Survey (1992). English Language Students in Cambridge;
- Cambridge City Council (1983). Specialist Schools and Colleges in Cambridge;
- Cambridgeshire County Council (2013). Survey of Specialist Schools

How the policy came about:

48. At the heart of the National Planning Policy Framework is a ‘presumption in favour of sustainable development’, for both plan-making and decision-making. For plan making this means that local planning authorities should positively seek opportunities to meet the development needs of their area. Local plans should meet needs, which are based upon evidence, and they should be flexible and be able to adapt to rapid change, unless any adverse impacts of doing so would significantly outweigh the benefits, or development is within protected areas.
49. The National Planning Policy Framework requires local authorities to support the knowledge industries and the development of a strong and competitive economy. Supporting further education organisations is compatible with national policy aims and the proposed economic vision for the city as a centre of excellence and world leader in higher education. In supporting to ongoing success of higher and further education in Cambridge, consideration needs to be given to the provision of sufficient student accommodation to meet the ongoing needs of a range of institutions, whilst addressing the potential for distortions in the local housing market as a result of the attractiveness to developers of providing student housing.
50. In view of the known student housing shortages in the city, the Cambridge Local Plan 2006 contained a number of policies addressing the need to deliver student accommodation. Policy 7/7 deals with staff and student housing for the University of Cambridge and sets out criteria for assessing proposals against. Policy 7/9 addresses the student accommodation needs for Anglia Ruskin University, through sites allocated for this purpose in the proposals schedule. Policy 7/10 supports the provision of speculative student hostels on sites that have not been allocated in the Local Plan, but have become available during the plan period. Policy 7/10 restricts such speculative development by way of a Section 106 to housing full-time students attending Anglia Ruskin University or the University of Cambridge. Concerns have been raised that this is unfair to other legitimate and established education providers in Cambridge such as specialist schools.
51. The Cambridge Local Plan 2006 also has a policy, which only deals with language schools. Existing Policy 7/11 does not allow for new permanent language schools to be set up in the city and regulates existing schools by virtue of a 10% tolerance control on new teaching floorspace provided. This policy has been in place for a considerable number of years and stems from concerns about possible impacts on the local housing market and previous Structure Plan policy towards selective management. However, language

schools are only one type of specialist school, so future policies would need to extend to include all of the other types of independent specialist schools and possibly independent academies. The numbers of these have increased from around three in the 1990s to approximately 11-14 currently. Examples include CATS in Round Church Street, Abbey College in Station Road, and Glisson Road, and Bellerby's College in Bateman Street and Manor Community College. Others such as Cambridge Centre For Sixth Form Studies are educational charities and non profit organisations more akin to a state registered schools catering for local students and boarders.

52. In the Issues and Options report (2012), student accommodation issues were raised in Options 95, 96, 144, 145, 147, 148, 149, 150, 151 and 152. These options dealt with both universities, tutorial colleges and other specialist education provision, such as language schools. The following paragraphs discuss the intention to move forward with the options 96, 144, 148, 150, 151 and 152 to form a policy on the development of student housing.

Growth of educational institutions

53. Future growth rates are predicted to continue the past trends of increases in undergraduates of around 0.5% per annum and postgraduates at 2.0% annually. This suggests 1,188 additional undergraduates and an additional 2,876 postgraduates at the University of Cambridge by 2031 and a further 1,000 students at Anglia Ruskin University.
54. The University of Cambridge continues to be a world leader in education and a vital driver of the local and national economy. In 2012, around 18,300 students studied full time at the University of Cambridge. The University of Cambridge continues to maintain a steady growth rate and is not facing the decline in student numbers being experienced by other United Kingdom higher education institutions. The majority of University of Cambridge students live in university or college owned accommodation, concentrated predominantly in the City Centre and to the west of the City Centre. The University of Cambridge's colleges aim to house 100% of undergraduates and 90% of their postgraduates. The University of Cambridge's targets for increasing student numbers over the coming years have to be achieved by the 31 colleges who are autonomous from the University of Cambridge, but house almost all students during their time of study in Cambridge.
55. Given land shortages within the city, the resulting requirements to house student numbers in college can at times create land use planning issues for the colleges. The Colleges currently have around 15,000 rooms available to house their students. A survey by the Colleges Bursars' Committee in April 2012 has revealed that over the past five years, the Colleges have added 158 new rooms per year through new build, conversion and adaptation of existing College building stock. The Colleges anticipate that they will be able to provide 140 new student rooms per year to 2016 (700 rooms in total). 40% of these new

rooms will be delivered through rationalisation and adaptation of existing college buildings. After 2016, the rate is likely to drop to around 112 new student rooms per annum as opportunities for windfall sites reduce. By 2031, the Colleges would need 21,390 rooms based on the above growth rates. They would therefore face a shortfall of around 6,390. If 2,800 can be provided within existing College sites this would leave the shortfall at 3590. Taking off 2,000 student bedrooms approved as part of North West Cambridge development would leave a need to find land for around 1,596 student rooms on allocated sites around the city. Based on recent developments and evidence put to the 2006 Local Plan Inquiry by the University of Cambridge, this could imply a net land requirement of 10.1 hectares for undergraduates and postgraduates.

56. Anglia Ruskin University also continues to grow, with postgraduate study as the key growth area. Anglia Ruskin University currently has 8,900 students studying in Cambridge, comprising 7,600 undergraduates and 1,300 postgraduates. Anglia Ruskin University has a much smaller stock of its own purpose built student accommodation and relies more heavily on head lease properties, hostels built by third parties, and housing its students in open market housing including Housing in Multiple Occupation.
57. Despite a continuing reliance on open market housing in the city, Anglia Ruskin University has made considerable progress in acquiring new purpose built student accommodation since the allocation of a number of sites for student accommodation in the Cambridge Local Plan in 2006. The policy approach taken in the 2006 Local Plan allowed for student accommodation to be delivered in lieu of Affordable Housing on a number of sites in the city, whilst significant levels of development around Cambridge railway station (CB1) allowed for the inclusion of student accommodation in the City Centre. 251 units have been delivered at the Brunswick site adjacent to Midsummer Common during 2012 and are predominantly occupied by Anglia Ruskin University students. 511 units have been delivered at CB1 which are proving to be popular with 1st year students. A further 739 student bedrooms may be delivered at CB1 within the later phases of the development, although they are not being specifically delivered for Anglia Ruskin University. In addition, other new accommodation has come forward on a range of sites around the city, including at Addenbrooke's, Perne Road and Malta Road, and has increased the overall stock of purpose-built student accommodation to 2,043 bedspaces. This figure includes the loss of 121 bedspaces at Bridget's and Nightingale hostels in Tennis Court Road. The number of managed head lease properties has continued to fall to around 180 bedspaces in 32 properties. The numbers of properties contracted with the private sector was at about 700 in 2011/12. With the growth in student numbers, however, the overall proportion of Anglia Ruskin University students housed in purpose built accommodation has fallen from 34% prior to the 2006 Local Plan to around 27% in 2011/12.

58. There are a growing number of specialist schools in Cambridge, including secretarial and tutorial colleges, pre-university foundation courses, crammer schools and tutorial colleges. These schools concentrate on GCSE and A level qualifications along with pre university entrance tuition. They attract a large number of students and contribute significantly to the local economy. The Cambridge Local Plan 2006 has a policy which only deals with language schools. However, these are only one type of specialist school and future policies would need to address all of the other types of independent specialist schools and possibly independent academies. Many of these specialist organisations attract school age children who live with families in the city and surrounding area or commute into Cambridge from other locations in the sub-region. As such, they do not necessarily place further pressure on the local housing market. In some cases, though, these types of organisation attract students from further afield and provide associated accommodation for boarders, e.g. Cambridge Centre for Sixth Form Studies. The 2006 Local Plan policy made an exception for secretarial and tutorial colleges allowing them to grow by 10% of their overall gross floorspace provided that they serve a mainly local catchment and provide residential accommodation, social and amenity facilities for all non local students.
59. Cambridge continues to be an important centre for study of English as a foreign language. Overseas students have been coming to Cambridge to study English for over 50 years. The city has over 20 permanent foreign language schools and a fluctuating number of around 30 temporary schools, which set up in church halls and other temporary premises over the summer months. Currently, the annual student load at these centres is thought to be around 31,000, though the average length of stay is only 5 weeks. Many schools house their teenage students with host families during the summer months, which also provides another source of income for local families and does not unduly cause pressures on the local housing market. Other schools are starting to take on more mature and business students, along with pre-university entrance students wishing to improve their English. Most make use of independently provided student accommodation to house their more mature students. This can involve use of existing University of Cambridge and Anglia Ruskin University accommodation outside term-time.

Affordable Housing Provision from Student Accommodation

60. Cambridge has a high level of private renting at 26.2% of total housing stock in the city², which enables the market to offer the greater flexibility required to meet the very high levels of turnover in the city. A significant proportion of the private rented sector is given over to housing students, and this has acted as a force in driving buy-to-let in the city, with associated implications for the general availability and price of accommodation.

² Census 2011.

61. It is important to note that student housing is not currently counted as a form of Affordable Housing provision. This is on the basis that it is not permanent housing, being provided only because an individual has chosen to study at a specific educational institution. It is recognised that further student housing provision might reduce pressure on the remainder of the city's housing stock dependent on the overall growth in student numbers at a range of institutions, but it is also noted that there can be a tension between the provision of student accommodation and other types of housing, with the two uses competing for the same sites. There is therefore a need to strike an appropriate balance to ensure that housing delivery, particularly Affordable Housing delivery, is not compromised. In the case of student accommodation, it benefits from not being required to contribute towards Affordable Housing provision, which may result in greater land values being achieved and little incentive to deliver non-student housing. Through the Council's Strategic Housing Land Availability Assessment, sites have been identified which could contribute to meeting local housing need. If these sites come forward without Affordable Housing, the Council would not be able to address Affordable Housing need.
62. Requiring Affordable Housing under option 95 (Affordable Housing contribution for new student accommodation) of the Issues and Options report (2012) would respond to the existing demand and need for increased provision, but it may have an adverse effect on viability of proposals for student accommodation and in turn lead to fewer proposals for student accommodation. This could exacerbate the existing pressure on the city's housing stock. In investigating this issue, the council appointed Dixon Searle to undertake viability assessment on the provision of Affordable Housing through the delivery of student accommodation. On the basis of the results generated from analysis, Dixon Searle advised the council that the average surplus is too low to confidently recommend that the council include a policy for the collection of financial contributions from student accommodation at this stage. A notional very low charge could potentially be levied but this could mean that any financial contribution towards Affordable Housing could potentially reduce or even remove any buffering inherent within the Community Infrastructure Levy rate suggested for student accommodation.
63. As such, Option 96 (No Affordable Housing contribution from new Student Accommodation) will be pursued.

Affordable Housing exemption

64. Policy 7/9 in the Local Plan 2006 was very supportive of the development of student hostels for Anglia Ruskin University. This included a provision that if residential developments provided a significant proportion of student hostel accommodation for Anglia Ruskin University, they would not have to provide affordable housing as set out in Policy 5/5. This has been successful in encouraging the provision of further student hostels at locations like the

former Cambridge Regional College Brunswick site and the Station Area (CB1). In relation to options 147 and 148 in the Issues and Options report, these options set out the opportunity to retain (147) or remove the exemption from Affordable Housing provision(148). Whilst Anglia Ruskin University does not have access to considerable levels of purpose-built student residential accommodation and remains highly dependent on houses acquired on short leases and on students living in HMOs, its circumstances have improved with the delivery of the Brunswick and Station Area student accommodation. Given the limited land availability in Cambridge and the need to provide more Affordable Housing to meet a range of needs, it is important that the council takes all reasonable opportunities to provide new market housing and Affordable Housing. The Council is committed to supporting the University of Cambridge, the colleges, Anglia Ruskin University and other institutions, which contribute to the knowledge economy, and acknowledges the important role that they play locally, nationally and internationally. However, the importance of and need for student accommodation must be balanced with the need to deliver Affordable Housing. As such, it is proposed that the exemption is removed and that option 148 is pursued through the new Local Plan.

Delivery of staff and student housing for the University of Cambridge only

65. Within the Issues and Options report (2012), Option 144 allowed for the development of sites for staff and student housing for the University of Cambridge. Whilst sites for student housing would be assessed against Policy 46, the allocation of sites is a separate process being undertaken as a part of the Local Plan Review. Staff housing may be provided in line with the requirements set out for employment related housing in policy 45 of the plan. Option 145 related to the delivery of student accommodation at North West Cambridge. This is being delivered as part of the planning permissions for the site. Whilst it may be the case that existing colleges gain access to some of the accommodation provided at North West Cambridge, the North West Cambridge site is subject to the planning policies set out in the North West Cambridge Area Action Plan. As such, neither of these options are to be taken forward into the plan.

Speculative Student Accommodation

66. Options 149 and 150 of the Issues and Options report (2012) set out two approaches to dealing with speculative student accommodation. Option 149 addressed the current approach, which restricts the provision of speculative student accommodation to use by Anglia Ruskin University and the University of Cambridge. Option 150 meanwhile suggested widening the approach to allow other established educational institutions to access speculatively provided student accommodation.
67. In relation to options 149 and 150 and the existing policy approach in Cambridge, a similar policy to existing Cambridge Local Plan 2006 Policy 7/10 in

Oxford (Policy CS25) was overruled by the Inspector at the Examination in Public into the Council's Core Strategy on 21st December 2010.

"...Student accommodation will be restricted in occupation to students in full-time education at either Oxford Brookes University or the University of Oxford. Appropriate management controls will be secured, including an undertaking that students do not bring cars to Oxford."

68. The Inspector removed the embargo restricting occupation of such hostels to students attending the two universities in Oxford on the basis that it was inequitable and was discriminating against non-university colleges.
69. The Inspector's report at Paragraphs 4.81 and 4.82 are particularly relevant; they state:

"The policy restricts the provision of student accommodation to that related to the Universities, effectively placing an embargo on student accommodation to serve the needs of the many non-university colleges in Oxford. The Council points to the greater emphasis of these other colleges on part-time courses and that a lot of their students take up lodging accommodation, so not adding to the pressures on the city's housing stock and limited development sites. Nevertheless, some of the students at these other colleges will be full-time and are just as likely to require housing out in the community and put pressure on the housing market. Where full-time students are on courses of upwards of an academic year, it seems to me that they are as likely as University students to be seeking their own housing as opposed to lodgings.

70. Whilst removing the policy embargo would increase the competition for any available sites, provided any new accommodation was directed to full-time students, and then the impact on the overall housing market would be very limited. These colleges also make their contribution to the local economy. I find little reason, in terms of housing pressures, to discriminate against non-University colleges. It is not justified in equity terms and I propose some wording changes to reflect this. Detailed consideration of the needs of the non-University Colleges can be looked at as part of subsequent DPDs."
71. The principle of targeting the policy towards full time students engaging in a full time course of a year or more at an existing educational establishment providing full time education within the city should serve to broaden the accommodation delivered to a wider range of establishments. As such, option 149 will not be pursued, whilst option 150 will form part of policy 46.

Specialist Colleges and Language Schools

72. Options 151 and 152 address specialist colleges and language schools respectively. Both options mainly address the provision of new and expansion of existing specialist colleges and language schools. It is recognised though,

that these forms of educational institution can impact on the local housing market. As such, policy 46 covers the needs of specialist colleges where students often participate in courses of over one year. Language schools have a different student base, with many students visiting for very short periods of time. Accordingly, it is recommended that the residential accommodation needs of language schools are addressed through provision of accommodation within language school sites, temporary provision within existing student accommodation outside term-time, and use of home-stay accommodation.

73. Policy 46 sets out a criteria-based approach to provision of student accommodation, requiring proposals for new student accommodation to meet identified needs of an existing educational institution within the city of Cambridge in providing housing for students attending full-time courses of an academic year or more. This addresses the issue discussed above regarding equity of approach to a range of institutions within the city. Additional criteria cover loss of existing housing, for which there is a need within the city; locational issues such as proximity to the institution and to sustainable transport modes; proctorial control of car usage in Cambridge and amenity for future residents.

Findings of the Sustainability Appraisal of the Cambridge Local Plan (July 2013)

74. The findings of the Sustainability Appraisal of the draft Cambridge Local Plan noted that Policy 46 sets out the requirements for student housing that allows the Universities and specialist colleges to grow. This policy only permits student housing where it is provided for students attending full-time courses of an academic year or longer and meets identified needs of an existing educational institution. Development would not be allowed to result in the loss of existing marketing or affordable housing and the loss of student housing would also be resisted, likely leading to positive effects.
75. Managing the development of speculative student accommodation forms part of Policy 46 in the Plan. The principle of targeting the policy towards full time students engaging in a full time course of a year or more at an existing educational establishment should serve to broaden the accommodation delivered to a wider range of establishments and reduce pressure on the local housing market.
76. Policy 46 should further support the approach to increasing the use of sustainable transport modes as it only allows new student housing in locations that are well served by sustainable transport modes; and subject to the condition that appropriate management arrangements are in place to ensure students do not keep cars in Cambridge.
77. In terms of requiring affordable housing as a result of student accommodation development, this would respond to the existing demand and need for

increased provision, but it may have an adverse effect on viability of proposals for student accommodation and in turn lead to fewer proposals for student accommodation coming forward. This could exacerbate the existing pressure on the city's housing stock. These concerns were raised by interim Sustainability Appraisal. In investigating this issue, the council appointed Dixon Searle to undertake viability assessment on the provision of Affordable Housing through the delivery of student accommodation. On the basis of the results generated from analysis, Dixon Searle advised the council that the average surplus is too low to confidently recommend that the council include a policy for the collection of financial contributions from student accommodation at this stage. A notional very low charge could potentially be levied but this could mean that any financial contribution towards Affordable Housing could potentially reduce or even remove any buffering inherent within the Community Infrastructure Levy rate suggested for student accommodation. As such, the preferred approach is not to seek Affordable Housing contribution from new Student Accommodation.

78. In relation to the existing situation where some sites allocated in the 2006 Local Plan have provision of student housing in lieu of affordable housing provision, this approach is not being continued in the draft Local Plan 2014. Whilst the concerns raised in the interim Sustainability Appraisal are recognised in terms of the impact on Anglia Ruskin University's provision of student accommodation, this matter needs to be balanced with the city's very high need for affordable housing.

Key Issues raised during Proposed Submission consultation

Policy 46: Development of student housing	
Total Representations: 19	
Object: 19	Support: 0
Objections	<ul style="list-style-type: none"> • The policy is not justified as the council has not undertaken its own assessment of need; • Policy should not require applicants to demonstrate that proposals meet an identified need; • Analysis needed for how much family accommodation is currently occupied by students; • Policy should allow student accommodation in lieu of affordable housing; • The policy should be altered to remove the restriction on occupation by students on full-time courses only; • Removing the need to link with an existing educational institution would provide a more competitive market and, therefore, a better range of provision; • A warden is necessary in larger student accommodation schemes; • Policy fails to curb development of gated communities; • Design for student accommodation has a lower bar than

	<p>mainstream residential accommodation;</p> <ul style="list-style-type: none"> • Need for well-designed communal space, including smoking zones; • No more student accommodation; • Further student accommodation will unbalance the mix of local communities; • Restriction on loss of market housing is inappropriate as student development makes more effective use of land; • Applications for new student blocks should identify existing HMO student housing which can be released back into the local housing market; • The building of new student accommodation should be linked to specific institutions; • Criterion (e) on car ownership is unenforceable and needs to specifically reference legally enforceable agreements between the council, educational institutions and students with appropriate financial penalties; • Criterion (f) is too vague and should be deleted; • Add new criterion (h) to policy “That all rooms are visitable by disabled students, family members and friends of residents and that 5% or more of the rooms have specialist facilities for disabled people”; • Amend paragraph 6.14 to replace the second and third sentences with “Student accommodation should be well designed, providing appropriate space standards and facilities.”
Support	Not applicable

Minor Modifications suggested following Proposed Submission consultation and implications for Sustainability Appraisal

79. As a result of assessment, two minor modifications are suggested for Policy 46: Development of student housing and paragraph 6.14 of the supporting text. Both changes are in the Addendum to the Cambridge Local Plan 2014: Proposed Submission document marked as PM/6/004 and PM/6/005.
80. In response to a representation (Representation Number 28138), PM/6/004 suggests that Policy 46, criterion (e) reads:
- “e. having appropriate management arrangements in place to ~~ensure students do not keep cars in Cambridge~~ discourage students from keeping cars in Cambridge;”
81. For clarity and in response to a representation (Representation Number 27142) PM/6/005 suggests that paragraph 6.14 reads:

“Evidence must be provided as a part of the application to show a linkage with at least one higher or further education institution. This policy only applies in instances where planning permission is required for development housing more than six students (sui generis). ~~It is accepted that, due to the relatively short lifespan of tenancies and the lifestyle of student occupants, different amenity standards should apply from those for permanent accommodation. However, student accommodation should still be well designed, providing appropriate space standards and facilities.~~ Student accommodation should be well designed, providing appropriate space standards and facilities. The provision of amenity space will need to reflect the location and scale of the proposal. The ability to accommodate disabled students should be fully integrated into any student housing development, in keeping with the requirements of Policy 51.”

82. Following consideration of the impact of these changes on the Sustainability Appraisal Framework, it has been concluded that these changes do not materially alter the findings of the Sustainability Appraisal.

Policy 47: Specialist Housing

EXISTING POLICY TO BE REPLACED (CAMBRIDGE LOCAL PLAN 2006)	OPTION(S) BEING TAKEN FORWARD FROM THE ISSUES AND OPTIONS REPORT (2012) AND ISSUES AND OPTIONS 2 (2013)	OPTION(S) NOT BEING TAKEN FORWARD FROM THE ISSUES AND OPTIONS REPORT (2012)
<ul style="list-style-type: none"> Policy 5/7 Supported Housing/Housing in Multiple Occupation 	<ul style="list-style-type: none"> Option 117: Specialist Housing 	<ul style="list-style-type: none"> Not applicable

Key issues raised during Issues and Options (2012) and Issues and Options 2 (2013) consultations:

SECTION OF THE ISSUES AND OPTIONS REPORT (2012)	KEY ISSUES ARISING FROM CONSULTATION
Option 117: Specialist Housing	<ul style="list-style-type: none"> Support for the principle of the option; Support for large, high quality retirement homes; Need for bungalows for the elderly; Housing cooperatives should be given more consideration; Need to separate specialist housing from affordable housing categories; Residents of specialist housing should have good access to safe and secure open space. It is important to health and well-being;

SECTION OF THE ISSUES AND OPTIONS REPORT (2012)	KEY ISSUES ARISING FROM CONSULTATION
	<ul style="list-style-type: none"> • Whilst supporting the need for a policy, caution should be exercised in specifying amenity space requirements for accommodation for the elderly; • Specialist accommodation should be available within communities so that people can remain within their existing community even if they require more care; • Any policy relating to specialist housing must take into account the market's ability to deliver such provision and other site-specific demands; • Specialist housing should be close to a local centre.
NEW OPTIONS ARISING FOLLOWING COMMUNITY INVOLVEMENT:	
No additional options have been suggested.	

Evidence base:

- Cambridgeshire County Council (2011). The Supporting People Commissioning Strategy 2011-2015;
- Cambridgeshire County Council (2011). Commissioning Strategy for Extra Care Sheltered Housing in Cambridgeshire 2011-15;
- Cambridge City Council (2012) Housing Strategy 2012 – 2015;
- Cambridge City Council, Older People's Housing Strategy 2009 – 2014.

How the policy came about:

83. One of the objectives in the council's Housing Strategy is to ensure that housing meets a range of specialist needs, and supported housing, in a range of tenures, adds to the mix and range of housing to meet this objective. It is therefore important that the Local Plan accommodates the provision of housing that may be designed in a particular way or has a staff office or staff night-time facilities when staff are needed to support the people who are living in the housing. This housing can often demand a larger plot or building 'footprint' and is often termed as 'supported housing'. Such housing should be provided across the city, as opposed to being concentrated in certain areas, to help to enable people moving into such accommodation to remain in their local area and to create and maintain balanced communities.
84. Specialist housing can be developed with particular groups of people in mind such as older people (including the frail elderly and those with dementia), people with physical and sensory disabilities, those with learning difficulties or acquired brain injury, young people at risk, people with alcohol or drug dependency, those requiring refuge from harassment and violence, and others who may, for a variety of reasons, be excluded from the local community. People with the need for specialist housing contribute to the community in

many ways, but for some their ability to participate fully in society is hampered by poor or inappropriate housing, which affects their physical or mental health, or their ability to receive appropriate support to enable them to live as independently as possible.

85. Specialist housing is designed so that support can be provided to them (and often to others in the wider community) to promote independent living. Examples may range from a small scheme of cluster flats with additional facilities for support staff, to much larger extra care schemes enabling older and disabled people to live in their own self-contained accommodation but with care and support on-site (Some specialist housing may not provide care or support from on-site – e.g. some forms of sheltered housing – but need to be designed in such a way that care and/or support can be brought on-site and provided in a co-ordinated way where appropriate). Where possible, such housing should be designed flexibly so that it can be adapted to meet alternative housing uses as needs change in the future.
86. Although some groups will continue to require specialist housing, this needs to be balanced with the current general direction of travel for health and social care commissioning, which includes enabling and supporting people to remain in their own homes, and being able to retain their independence there for as long as possible. This is reflected in the Cambridgeshire Supporting People Commissioning Strategy, which generally aims to reduce the amount of adult social care funded services in specialist accommodation, in favour of supporting people in their own homes where possible.

Housing Needs of Older People

87. The Joint Strategic Needs Assessment for Cambridgeshire provides some context for an understanding of the housing needs of older people in the city, although this is currently under review (due to be completed by April 2013). While the length of time people can expect to live has increased, periods of life spent in poor health or with a limiting chronic illness or disability have increased.
88. The city's population aged 65 and over has increased by 1.7% between the 2001 and 2011 Censuses – a significantly lower increase than other parts of the sub-region, with numbers in some five-year age-bands decreasing. However, there has been a 10% increase in those aged 65-69, and a 24% increase in the number of people aged 85 and over.
89. Population projections vary, but the older population is expected to increase over time (although less so for Cambridge than other parts of the housing sub-region). In the 20 years, 2010 to 2030 the number of people with dementia across Cambridgeshire as a whole is expected to double, and incidence of dementia increases with age.

90. One of the key priorities in the Health and Wellbeing Strategy for Cambridgeshire is to support older people to be independent, safe and well. The council's Older People's Housing Strategy 2009 –2014 recognises that people who are getting older now are demanding better quality accommodation and services than previous generations. The increase in the frail-elderly population people means that we should plan accommodation specifically to meet their needs, whilst assuming that the majority of younger-older people (aged 60-65 or 70), will choose to remain in their own homes.
91. This sets the context for there to be a range of housing for older people in Cambridge that at one end of the spectrum provides accessible accommodation, which has good space standards and is located in reasonable proximity to local services and amenities, through to more traditional forms of sheltered housing for older people and Extra Care Schemes for older people who nevertheless want to stay as independent as possible. Extra Care schemes provide self-contained housing, but with other facilities provided on-site where people can receive care and support but still retain their independence, as opposed to residential care homes where occupants do not have their own tenure or 'own front door'. There are currently four Affordable Housing Extra-Care schemes in the city, and a number of traditional sheltered housing schemes. There are also some private schemes providing care and/or support for older people, and a number of residential nursing and care homes. Detailed mapping of existing provision is available in the Cambridgeshire Older People's Joint Strategic Needs Assessment.
92. A significant issue for local health and social care commissioners is where specialist provision for older people may achieve planning approval, without reference to the demands they may place on local health and social care revenue budgets – either immediately or in the future as self-funding residents move out and new residents move in. Therefore it is important to ensure that for any new specialist housing schemes – including those for older people - the necessary health, care and support revenue funding is agreed in principle by the appropriate commissioners prior to planning permission being granted.
93. It should be noted that the council is not the statutory body that commissions care services for older people. This has been the County Council's responsibility with services often jointly commissioned with the health services through the Primary Care Trust (PCT). However, with new national health and social care commissioning arrangements coming into play, including the abolition of PCTs, the removal of the ring-fence around the Supporting People budgets, and new commissioning responsibilities for GPs etc, future arrangements for securing revenue funding for new schemes have not yet been clarified. Discussions with partners on this issue are underway.
94. The Cambridgeshire Extra Care Commissioning Strategy 2011 (2011 – 2015) outlines the extra care housing priorities for Cambridgeshire, (although again

this is currently under review). Under this strategy, health and social care approval for development of and revenue funding for new schemes in Cambridge is currently being given lower priority than in other districts due to the shortage of provision in other parts of the county. However, this does not preclude development in the city if strategically important opportunities arise that might otherwise be missed.

95. Revenue funding for sheltered housing schemes is less of an issue, as in future, as part of the review of County Council budgets, residents will in future only receive funded support for short periods of time as required, in line with plans for support to be provided to older people in the wider community. The same applies to individual housing units which may be designated for occupation by older people.

Housing Needs of Other Vulnerable People

96. Whilst many vulnerable people with care or support needs live in general needs housing, there are some groups for whom more specialist provision is required. Current provision where support is funded by Cambridgeshire County Council includes:

- Housing with employment for offenders and people at risk of offending (10 units at the Jubilee Project)
- Two housing schemes for people with learning disabilities (24 units)
- Four housing schemes for young people at risk (130 units)
- Two homeless hostels owned by Cambridge City Council (27 units)
- Housing for single homeless people - 206 units over 12 schemes (including 222 Victoria Road and the Assessment Centre at Jimmy's)
- Housing for teenage parents (one 7-unit scheme)
- Two hostels for people fleeing domestic violence (11 units)
- A six-unit Controlled Drinking project (451 Newmarket Road)
- Two children's homes providing 13 units.

97. Evidence of numbers of people affected by such issues as learning disability, mental health problems, homelessness, etc – i.e. of groups within which specialist housing might be a solution for some – are available in the Cambridgeshire Joint Strategic Needs Assessment. However, what is not available is a full assessment of the current and future need for specialist housing accommodation for these groups.

98. Work to date with health, care and support commissioners has identified the current need for the following in or close the city:

- A small group home providing permanent accommodation for people with profound and multiple disabilities;
- Cluster move-on accommodation for people with physical disabilities;

- Cluster flats with office accommodation for people with mental health needs;
 - Cluster accommodation with a lounge and sleep-in provision for people with learning disabilities.
99. However, this is not comprehensive, and does not take into account needs which may arise in the future. More work is required in this area. As with housing for older people, health, care and support revenue funding needs to be in place before planning permission can be granted.

Developing a policy on specialist housing

100. The National Planning Policy Framework sets out the importance of planning for a mix of housing to meet different groups in the community. However, the location of provision needs careful consideration and should be in accordance with locally identified need. On this basis, only one reasonable option was considered appropriate for inclusion in the Issues and Options consultation in Summer 2012. This option's approach would allow for development of a policy relating to all types of specialist housing, including extra care provision for older people, to be developed. There was support for the principle of the option. Specific reference should be made in the criteria to the need for residents of specialist housing to have good access to safe and secure open space for their health and well-being and need for such provision to be in close proximity to local services. This promotes the need for specialist housing to form part of sustainable, mixed and balanced communities. With particular reference to older people, in Cambridge, over a third of people aged 60 plus have no access to a car, and this percentage increases with age, so the need for good public transport, local amenities and welcoming neighbourhoods is significant.
101. In combination with other relevant policies within the Local Plan, when assessing the suitability for supported care housing and care homes, the following should be taken into consideration:
- The location of such provision, including the proximity of the site to public transport facilities, the provision of a safe, accessible and secure environment and the convenience of the site's location in relation to local shops, services and community facilities;
 - The location of such provision in relation to other similar accommodation;
 - The provision of an adequate level of amenity space which is safe and suitable;
 - There is evidence of demonstrable need in accordance with the Council's Housing Strategy, the Cambridgeshire Health and Well-Being Strategy, the Cambridgeshire Joint Strategic Needs Assessment, Cambridgeshire County Council and local health commissioning strategies and, where appropriate, the Extra Care Commissioning Strategy for Cambridgeshire and its successor documents; and

- The approval of revenue funding for the necessary care and support to be provided, from appropriate health and social care commissioners under newly emerging commissioning arrangements.

This allows specific proposals to come forward in accordance with local need.

Findings of the Sustainability Appraisal of the Cambridge Local Plan (July 2013)

102. The findings of the Sustainability Appraisal of the draft Cambridge Local Plan note that the achievement of high standards of construction in residential development more generally is the focus of Policy 50. This states that new residential developments are only to be permitted where they provide reasonable living conditions, including in terms of room sizes and direct access to an area of private amenity space. This is likely to lead to positive effects and is further supported by Policy 51, which notes that all housing development should adopt the Lifetime Homes Standard and that a percentage of homes should meet the Wheelchair Housing Design Standard; and Policy 47 which calls for housing for people with specific housing needs (such as the elderly and disabled) to be suitable for the intended occupiers, plus accessible to local shops, services, public transport and community facilities.

Key Issues raised during Proposed Submission consultation

Policy 47: Specialist housing	
Total Representations: 5	
Object: 4	Support: 1
Objections	<ul style="list-style-type: none"> • The policy should require specialist housing to comply with relevant quality standards; • Specialist housing should be of high quality design to promote a sense of pride, identity and community; • Specialist housing should be positively acknowledged and well-distributed throughout the city in appropriate areas to reflect the needs of the occupiers and reduce impacts on local residents; • More over 50s retirement homes should be made available; • In paragraph 6.15, replace "people with physical, sensory and learning disabilities," with "disabled people"; • In paragraph 6.16, amend by adding: <ul style="list-style-type: none"> • "Student accommodation; • Respite, rehabilitation and convalescent accommodation; • Bespoke accommodation; • Specialist housing providers."
Support	<ul style="list-style-type: none"> • It would be positive for charitable organisations such as almshouses to work with the council to ensure provision of new economic rent properties for vulnerable people.

Minor Modifications suggested following Proposed Submission consultation and implications for Sustainability Appraisal

103. During the Proposed Submission consultation, for clarity and to reduce repetition, a minor modification to remove the second sentence of paragraph 6.15 of the supporting text to Policy 47: Specialist Housing was suggested. This change is in the Addendum to the Cambridge Local Plan 2014: Proposed Submission document marked as PM/6/006. PM/6/006 suggests that the whole of the second sentence of paragraph 6.15 is deleted as follows:

“This policy relates to housing designed and designated for occupation by older people, people with disabilities, and vulnerable people with specific housing needs, referred to within the policy and hereafter as ‘specialist housing’. ~~Specialist housing can be developed with particular groups of people in mind such as older people (including the frail elderly and those with dementia), people with physical, sensory and learning disabilities, young people at risk, people with alcohol or drug dependency, those requiring refuge from harassment and violence, and others who may, for a variety of reasons, be excluded from or find it more difficult to integrate with, the local community.~~ People with the need for specialist housing contribute to the community in many ways, but for some their ability to participate fully in society is hampered by poor or inappropriate housing, which affects their physical or mental health, or their ability to receive the support they need to live as independently as possible.”

104. Following consideration of the impact of this change on the Sustainability Appraisal Framework, it has been concluded that this change does not materially alter the findings of the Sustainability Appraisal.

Policy 48: Houses in Multiple Occupation

EXISTING POLICY TO BE REPLACED (CAMBRIDGE LOCAL PLAN 2006)	OPTION(S) BEING TAKEN FORWARD FROM THE ISSUES AND OPTIONS REPORT (2012) AND ISSUES AND OPTIONS 2 (2013)	OPTION(S) NOT BEING TAKEN FORWARD FROM THE ISSUES AND OPTIONS REPORT (2012)
<ul style="list-style-type: none"> Policy 5/7 Supported Housing/Housing in Multiple Occupation 	<ul style="list-style-type: none"> Option 116: Criteria based policy for HMOs 	<ul style="list-style-type: none"> Not applicable

Key issues raised during Issues and Options (2012) and Issues and Options 2 (2013) consultations:

SECTION OF THE ISSUES AND OPTIONS REPORT (2012)	KEY ISSUES ARISING FROM CONSULTATION
Option 116: Criteria based policy for HMOs	<ul style="list-style-type: none"> • The need for a policy was largely supported by respondents. Particular reference was made to the need for a cap on the number of HMOs in a given area. • The designation of three storeys seems out of date with so many houses having loft conversions; • Inhabitants of large HMOs are often transient and some landlords do not keep their properties in a good state of repair; • Would like to see specific policy that deters the conversion of large family homes to HMOs; • There should be a requirement for all licensed HMOs to lodge contact details for their owners and managers with local police or on the City Council website, so neighbours can have immediate access in cases of anti-social behaviour or emergencies; • Restrictions on car ownership and parking permits should be considered; • Many small houses in Romsey don't count as HMOs due to being on two storeys, but are overcrowded and provide poor living conditions; • Largest properties need improved regulation, without limiting the contribution that flexible shared housing makes to local housing provision; • There should be a review and improvement plan for the private rented sector. • Car parking is often a vexed issue with HMOs, so it is welcome to see it covered in the criteria; • Where respondents objected, it was based on the impact that restrictive criteria on HMOs could have on the Cambridge housing market; and upon the difficulty of enforcing such a policy. A number of Colleges and Anglia Ruskin University responded in objection due to the impact restrictions could have on students' access to housing. HMOs are an essential sector of the housing stock at the lower end of the housing market. A positive approach should be taken to provision. Para 9.67 states 20% of HMOS are occupied by students. Therefore HMO policy should link in to a supportive policy for the provision of new student accommodation as the demand for both types of housing increases; • HMOs are an important part of the housing market in Cambridge. Cost of housing prices many young people out of the market. There is a shortage of affordable

SECTION OF THE ISSUES AND OPTIONS REPORT (2012)	KEY ISSUES ARISING FROM CONSULTATION
	<p>housing and 8,210 people on the Council's waiting list. HMOs play an important role in meeting housing needs and enabling workers who cannot afford to buy to live in the city close to where they work. Restrictions on HMOs will worsen affordability and push rents up;</p> <ul style="list-style-type: none"> • There is the need to consider cumulative impact of HMOs in a given area, as they impact on availability of family housing and weaken the sense of community in a locality; • The threshold for converting small housing units to HMO should be lowered.
NEW OPTIONS ARISING FOLLOWING COMMUNITY INVOLVEMENT:	
<p>It was suggested that policy should be developed which deterred large family homes from being converted into HMOs. Additionally, it was suggested that area-based policy should be developed to protect family homes in the Mill Road and Glisson Road/Newtown Conservation Area from conversion to HMO. One respondent suggested that the number of HMOs allowed in a given area should be subject to a cap.</p>	

Evidence base:

- Cambridge City Council (2009). Private Sector Housing Condition Survey;
- mruk research for Cambridge City Council (2013) Research into House in Multiple Occupation in Cambridge- Research Findings;
- National HMO Lobby (2008). Balanced communities and studentification: Problems and solutions;
- The Cambridge Sub-region Strategic Housing Market Assessment (2008 and updates);
- Department for Communities and Local Government Circular 08/2010 Changes to Planning Regulations for Dwellinghouses and Houses in Multiple Occupation;
- Census 2011;
- The Town and Country Planning (General Permitted Development) (Amendment) (England) Order 2010;
- The Town and Country Planning (General Permitted Development) (Amendment) (No.2) (England) Order 2010.

How the policy came about:

105. The Government's Circular 08/2010³ sets out the Government's formal guidance on dealing with Houses in Multiple Occupation (HMOs) through the planning system. It recognises in paragraph 2 of this circular that a high concentration of shared homes can sometimes give rise to problems, especially if too many properties in one area are let to short-term tenants with little stake in the local community. The National Planning Policy Framework does not make specific reference to HMOs, but does assert that local planning authorities should identify the size, type, tenure and range of housing that is required in particular locations, reflecting local demand (paragraph 50).
106. In planning terms, HMOs are currently split into two types, based on the number of occupants:
- A small HMO - this is a shared dwelling house which is occupied by between 3 and 6 unrelated individuals who share basic amenities such as a kitchen or bathroom. This falls into Use Class C4 under the Town and Country Planning Uses Classes Order (2010).
 - A larger HMO – this is when there are more than six unrelated individuals sharing basic amenities such as a kitchen or bathroom. This falls outside the Town and Country Planning Uses Classes Order (2010) and is categorised as sui generis.
107. The change in approach to HMOs stems from amendments made to the Use Classes Order and the General Permitted Development Order⁴ on 6 April 2010 to introduce a new class C4: Houses in Multiple Occupation. Initially, the changes made in April 2010 meant that planning permission would be required for any change from a single household dwelling to either a small or a large HMO. However, on 1 October 2010, further changes were made to the General Permitted Development Order⁵, which allows for permitted change of use from C3 residential use to a C4 HMO without the need for planning permission. It should be noted that the definition of an HMO for planning purposes differs to the definition in the Housing Act 2004.
108. HMOs form an important part of the housing market in Cambridge. According to the Council's Private Sector House Condition Survey 2009⁶, there were then approximately 5,000 HMOs in the city (using the Housing Act definition), making up some 12.6% of the housing stock compared with the national average of just over 2%. Just over 1,000 of these were thought to be occupied by students. With high house prices and private rents, and a relatively young population, HMOs add to the housing mix and play an important role in

³ Department for Communities and Local Government Circular 08/2010 Changes to Planning Regulations for Dwellinghouses and Houses in Multiple Occupation.

⁴ The Town and Country Planning (General Permitted Development) (Amendment) (England) Order 2010

⁵ The Town and Country Planning (General Permitted Development) (Amendment) (No.2) (England) Order 2010

⁶ Cambridge City Council House Condition Survey 2009:
<http://www.cambridge.gov.uk/ccm/content/housing/housing-strategy-and-research/housing-research.en>

meeting a wide range of housing needs, and in helping to prevent homelessness. Cambridge has a high level of private renting at 26.2% of total housing stock in the city⁷, which enables the market to offer the greater flexibility required to meet the very high levels of turnover in the city. A significant proportion of the private rented sector is given over to housing students, with associated implications for the general availability and price of accommodation. Students at the two universities make up approximately 22% of the city's population. Overall, there were 18,243 full-time students enrolled at the University of Cambridge in 2011, including 11,948 undergraduates, and 8,911 students at Anglia Ruskin University in Cambridge, including 7,636 undergraduates. Within the University of Cambridge, Colleges aim to house all of their undergraduates and 90% of their postgraduates. Whilst Anglia Ruskin University has been increasing its stock of student accommodation in recent years, many students remain dependent upon the private rented sector.

109. Whilst there are a significant number of HMOs inhabited by students, there is also a demand for this type of accommodation from young professionals and economic migrants. The high cost of housing in Cambridge makes HMOs a more affordable option for many than self-contained accommodation, and rooms in HMOs are in high demand. Tables 2 and 3 below show that both the average and lower quartile monthly rents on a room (although not necessarily in a HMO as legally defined) have increased faster than the rent on a one bedroom property over the past year.

Table 2: Average rent per calendar month in Cambridge

	Dec 2011	June 2012	Dec 2012	Change	% Change
Room	£405	£432	£488	£83	20%
Studio	£604	£641	£675	£71	12%
1 bedroom	£757	£769	£802	£45	6%

Source: OA data and Cambridgeshire Atlas

Table 3: Lower quartile rent per calendar month in Cambridge

	Dec 2011	June 2012	Dec 2012	Change	% Change
Room	£359	£360	£420	£61	17%
Studio	£525	£580	£613	£88	17%
1 bedroom	£665	£680	£725	£60	9%

Source: OA data and Cambridgeshire Atlas

110. HMO accommodation may be subject to further pressures as reforms to the welfare system take effect, particularly amongst under 35s who are no longer entitled to claim Housing Benefit (Local Housing Allowance) (at the single-room

⁷ Census 2011

rate. The shared accommodation rate at April 2013 is £76.65 per week – equating to around £316 per month, which is insufficient to cover even the lower quartile rent on a room in the city. At April 2013 there were 469 one-room Local Housing Allowance claimants in the city (a number that at the moment currently remains fairly stable).

111. Unfortunately, HMOs are also associated with issues that affect the neighbourhood, which can result from poor management of properties. Concentrations of poorly managed HMOs can change the nature of an area, impacting on community cohesion. The conversion of family-size dwellings to HMOs also reduces opportunities for families to buy or rent houses, potentially contributing to the high cost of housing in the city. It is recognised that issues can sometimes arise if there are high concentrations of this type of accommodation. Issues can include:
- Additional need for car and cycle parking provision;
 - Inadequate bin storage space with associated difficulties for refuse collection;
 - Anti-social behaviour and the consequential impact on other residents and the local community where properties are poorly managed; and
 - Poor internal conditions such as low quality amenities and overcrowding, which can often have an adverse impact on the health, safety and welfare of occupiers and neighbours.
112. Given the potential issues associated with HMOs, it was considered reasonable to include Option 116 'Criteria based policy for HMOs' in the Issues and Options report (2012). This outlined the factors to be taken into consideration when making decisions on relevant planning applications. Given that HMOs will generally accommodate a greater number of adults than an equivalent sized family dwelling, it was considered important to set out specific criteria in the policy to require full consideration of these aspects of development, when creating an HMO. This approach does not restrict or limit HMOs in a specific geographical area and is consistent with national guidance and the current approach set out in the 2006 Local Plan.
113. Conversely, setting out a policy with a presumption against further HMO development was not considered to represent a sustainable approach as it would not provide sufficient local flexibility in tenure and household composition. Whilst there may be concerns that over-concentrations of HMOs lead to unbalanced and transient local populations, and can give rise to problems for communities, the adoption of areas of restraint for HMOs or use of a threshold based policy would require a significant evidence base, which would require consistent updating. Restrictive approaches could have a negative impact on the local housing market and could also prove difficult to enforce. Whilst a case could potentially be made for introducing a cap on the number of HMOs in a given area, there is a lack of evidence to prove the need for a cap. Such an evidence base would be costly to produce and would need

to be maintained. Given that the broad thrust of the Plan welcomes the vitality and vibrancy that the students and workers involved in universities and the knowledge-based economy bring to Cambridge, on balance it was considered that the case for introducing a cap has not been made.

114. It was agreed at Development Plan Scrutiny Sub-Committee in February 2013 to pursue Option 116, which set out a criteria based approach, recognising the contribution that HMOs make to the overall supply of housing in Cambridge.
115. Members have previously raised concerns about the impact of HMOs on particular areas of the city and the quality of accommodation experienced by HMO residents. These concerns resulted in a project to look in more detail at HMO issues and recommend how they can best be tackled.
116. As part of this project the council commissioning consultants MRUK to carry out a qualitative and quantitative study of HMO tenants living in smaller HMOs⁸ in order to establish their living conditions, their reasons for living in HMOs and their overall perceptions of HMO accommodation within the city. The study, which took place in Winter 2012/13 involved a door-step survey of a sample of HMO tenants, and some further focus groups. It produced useful data for the council in terms of its role in providing housing advice to both landlords and tenants, and maintaining and improving the environmental health of the city. From a planning perspective, the study addressed issues such as car ownership, waste management, the quality of provision and the relationship of HMOs with their wider environment.
117. Quantitative outputs of the survey should be treated with caution for a variety of reasons, e.g. difficulties in identifying which properties in the city are HMOs. However, it does give a flavour of some of the issues experienced by tenants.
118. Residents of HMOs surveyed were mostly living in areas with a mix of accommodation types, including both HMOs and family houses. Overall, they did not identify any specific benefits of living in areas where there was only shared accommodation, nor did they express a desire to live in such an area. Furthermore, the diversity of properties was generally seen as an advantage. Students valued the fact that it made them feel as though they were living in a real-world environment; somewhat detached from student life. However, while residents liked living in areas with different accommodation types, they felt that this did lead to some problems. They identified conflicts between residents in shared accommodation and other residents; some of which were due to incidents that had occurred and others due to general perceptions of those living in shared accommodation. The most common incidents were around noise levels, with many residents having experienced complaints from neighbours about these. It was accepted that noise levels were sometimes

⁸ Smaller HMOs were considered in the study as the Council has traditionally had less access to data on smaller HMOs as they are not subject to the same licensing regime as larger HMOs.

higher in shared accommodation therefore respondents were not overly critical of neighbours who complained.

119. In terms of quality of accommodation, tenants felt that choice was reduced because the physical condition of properties varies considerably, meaning that many properties were not seen as suitable. Tenants also identified a split between student and non-student properties, which further reduced availability. Accommodation was generally thought to be harder to find close to the start of academic terms, due to a high demand amongst students.
120. In relation to car ownership, the study highlighted that just over half of the respondents reported that a vehicle was owned by someone in the HMO (57%). However, the incidence of car ownership was higher in non-student HMOs and the majority of HMOs only had one or two vehicles associated with the property. Surprisingly, tenants with five or more other occupants in the property were most likely to have no vehicles associated with the property (49%). Two in five properties with two or three occupants had one vehicle compared to one in five properties with five or more occupiers. There were generally few issues with parking, but those problems that did occur related to parking permits. Most residents were not given allocated parking spaces by their landlords and, as such, they tended to park in areas where permits were not required. While this was inconvenient, residents generally felt they were able to get a space without too much difficulty. However, those who lived in areas not requiring permits were concerned about a permit system being implemented in future, and the impact this would have on residents.
121. Waste management was also raised as a specific issue within the study. There was a sense that waste storage and collection could be improved. Some residents felt that their properties tended to generate more waste and that the number of bins allocated to each house could be increased. Those respondents from properties housing 5 or more occupants were more likely to have said there were not sufficient bins for recycling. Residents felt that, because recycling facilities were often stored in communal spaces, these areas could become messy because nobody took responsibility for their maintenance. Residents also often tended to use or see others using bins belonging to other households if they ran out of space, which could lead to bins overflowing.
122. A survey of a sample of landlords and letting agents – as part of the same project – has also highlighted concerns around waste management and the need for tenants to have more information on their rights and responsibilities.
123. In order to allow further development of HMOs, where the quality of the HMO itself is appropriate and there is no adverse impact on neighbourhood amenity, the criteria based approach for HMOs was followed in tandem with policies supporting the delivery of appropriately located purpose-built student accommodation; addressing the conversion of large properties (Option 118);

Lifetime Homes (Option 111); residential space standards (Options 106 – 110 and Options I.1 – I.3). It should be noted that occupiers of new HMOs would not be eligible for parking permits in areas of the city where controlled parking zones are in place. In those areas of the city, without controlled parking zones, the Council would not be able to restrict the number of vehicles associated with an HMO.

124. The criteria based approach discussed at Development Plan Scrutiny Sub-Committee in February 2013 suggested the following criteria:

- Consideration of potential impact on the residential amenity of the local area including noise from concentrations of these uses;
- Suitability of the building or site including any outbuildings and whether appropriate bin storage, cycle and car parking and drying areas can be provided;
- Proximity to bus stops, pedestrian and cycle routes, and shops and other local services; and
- Appropriate management arrangements are in place in order to reduce anti-social behaviour and any adverse impact on local residents.

125. This policy would only apply where an application for planning permission is required for a large HMO (sui generis) or where a change of use from a use other than C3 residential to a C4 HMO occurs.

Findings of the Sustainability Appraisal of the Cambridge Local Plan (July 2013)

126. The findings of the Sustainability Appraisal of the draft Cambridge Local Plan noted that Policy 48 states that proposals for large houses in multiple occupation must not harm residential amenity and must be accessible to local services, likely leading to positive effects.

Key Issues raised during Proposed Submission consultation

Policy 48: Housing in Multiple Occupation	
Total Representations: 14	
Object: 11	Support: 3
Objections	<ul style="list-style-type: none"> • Over concentration of HMOs needs to be quantified; • It is difficult to monitor HMOs once established; • HMOs reduce the amount of family housing available and encourage buy to let; • HMOs affect the stability and cohesion of communities and impact negatively on the environmental quality of an area; • Small HMOs should also be covered by this policy as in Oxford; • Should be a limit on HMOs tailored to different areas of the city, particularly Petersfield;

	<ul style="list-style-type: none"> • Remove criterion (a) as it could restrict the development of HMOs which are much needed to address housing need; • New development should meet Building for Life standards; • Policy should make a distinction between HMOs which let to short-term tenants and long-term tenants; • Policy should define what contributions HMO developments should be making; • Policy should be more prescriptive in order to ensure better quality development; • Policy should set out obligations on HMO owners for living standards and maintenance;
Support	<ul style="list-style-type: none"> • HMOs form an important part of the stock of College student accommodation. It is important that the Colleges are able to provide for a flexible supply of accommodation; • Stronger policy is essential to allow applications to be considered on their cumulative impact locally, effect on tenure mix and on availability of housing for larger families in area; • Support for the provision of multiple occupation housing, particularly innovative solutions such as cohousing. This is more sustainable and helps build communities.

Minor Modifications suggested following Proposed Submission consultation and implications for Sustainability Appraisal

127. No changes to Policy 48: Housing in multiple occupation or the supporting text are suggested in the Addendum to the Cambridge Local Plan 2014: Proposed Submission document. There are therefore no impacts on the findings of the Sustainability Appraisal.

Policy 49: Provision for Gypsies and Travellers

EXISTING POLICY TO BE REPLACED (CAMBRIDGE LOCAL PLAN 2006)	OPTION(S) BEING TAKEN FORWARD FROM THE ISSUES AND OPTIONS REPORT (2012) AND ISSUES AND OPTIONS 2 (2013)	OPTION(S) NOT BEING TAKEN FORWARD FROM THE ISSUES AND OPTIONS REPORT (2012)
<ul style="list-style-type: none"> • Policy 5/8 Travellers 	<ul style="list-style-type: none"> • Option 119: Criteria based policy for the location of Gypsy and Traveller sites 	<ul style="list-style-type: none"> • Not applicable

Key issues raised during Issues and Options (2012) and Issues and Options 2

(2013) consultations:

SECTION OF THE ISSUES AND OPTIONS REPORT (2012)	KEY ISSUES ARISING FROM CONSULTATION
Option 119: Criteria based policy for the location of Gypsy and Traveller sites	<ul style="list-style-type: none">• Gypsies and Travellers are the largest minority group comprising 1% of the population in our region, yet the Council suggests only 1 pitch is required between 2011-2031. The Cambridge Sub-Region Gypsy and Traveller Accommodation Needs Assessment (GTANA) 2011) seriously underestimates the need for permanent pitches in Cambridgeshire. The Assessment was carried out by the local authorities themselves as a technical exercise;• The gradient of inequalities may be steeper than reported here. The recent inequalities report from the DCLG includes the following statement in relation to life expectancy "...a recent study stated that the general population were living up to 50% longer than Gypsies and Travellers";• Wording should be more careful on whether Gypsies and Travellers travel;• There is a need for Travellers to have better access to education;• This does not sufficiently recognise the extent to which Travellers have been forced into Council accommodation against their wishes and in a way which erodes their culture, and nor does it reflect the detrimental effects of being forced into council housing;• A significant part of the demand for new pitches is from Gypsies and Travellers moving from bricks and mortar into private sites. The numbers seriously underestimate the numbers involved;• Needs to be independent consultation with the Traveller community;• Consideration should be given to a transit site near Addenbrooke's;• Need to continue working with South Cambridgeshire to progress pitch provision.• The requirement that 'There should not be an unacceptable adverse impact on the amenity of nearby residents or the appearance or character of the surrounding area.' allows for prejudice to determine objections by other residents;• The approach to Traveller sites should be as similar as possible to that for housing;

SECTION OF THE ISSUES AND OPTIONS REPORT (2012)	KEY ISSUES ARISING FROM CONSULTATION
	<ul style="list-style-type: none"> • Protection of residential amenity is paramount; • Green Belt land should not be used for Traveller site provision. • Specific site allocations must be made; • Support planning permission for pitches at the existing Smithy Fen site in Cottenham; • Improve current sites and improve transport links to these sites; • Large sites should be possible to allow the Traveller community to thrive in large, mutually supportive, extended family groupings. Amenity blocks and provision for chalets as well as trailers and caravans are all necessary. Without permission for sufficient amenity blocks, proper sanitation will not be possible leading to inhumane living circumstances; • The Council could substantially enhance the prospects for traveller development through a policy to connect the Fen to Cowley Road, providing more direct connection to the trunk road network for heavy vehicles. Given the presence of the railway sidings this is likely to be along the northern boundary of Network Rail's land; • Spend grant funding on provision of new permanent sites with proper amenities; • Provide sites on brownfield uncontaminated sites; • Take on ideas from other existing sites where there is high quality internal and external landscaping to improve amenity for both traveller and settled communities. <p>Sites identified within the urban area during consultation:</p> <ul style="list-style-type: none"> • Land off Coldham's Lane; • A transit site near to Addenbrooke's; <p>Sites identified within the Cambridge Green Belt during consultation:</p> <ul style="list-style-type: none"> • Areas on the edge of the city should be set aside for new provision; • A transit site near to Addenbrooke's; • Area adjacent to the new station at Northern Fringe East; • South Cambridgeshire or elsewhere in the county;

SECTION OF THE ISSUES AND OPTIONS REPORT (2012)	KEY ISSUES ARISING FROM CONSULTATION
	<ul style="list-style-type: none"> • Beside Babraham Road Park and Ride site.
NEW OPTIONS ARISING FOLLOWING COMMUNITY INVOLVEMENT:	
Respondents raised the need for site allocations to be made for Gypsy and Traveller provision.	

Evidence base:

- CLG (2012). Planning policy for traveller sites;
- Cambridgeshire County Council (2006). Cambridge Sub-Region Traveller Accommodation Needs Assessment;
- Cambridgeshire County Council (2011). Cambridge Sub-regional Gypsy and Traveller Accommodation Needs Assessment (GTANA);
- Cambridge City Council (2012). Cambridge Local Plan Towards 2031: Technical Background Document. Gypsy and Traveller Provision in Cambridge – Site Assessment;
- Cambridge City Council (2012) Housing Strategy 2012-2015;
- South Cambridgeshire District Council (2012) Local Plan: Issues and Options Report.

How the policy came about:

128. In March 2012, the Government released national guidance on planning for Gypsy and Traveller sites. The guidance requires that councils set pitch targets to address the likely need, working collaboratively with neighbouring authorities. The guidance has a requirement to maintain a five-year supply of specific deliverable sites against their locally set targets and requires councils to develop criteria based policies to guide site allocations and planning applications for Gypsies and Travellers. There are currently no authorised Gypsy and Traveller sites in Cambridge although there are a number in South Cambridgeshire, some of which are on the edge of the city. There are no unauthorised sites in Cambridge, but small groups of Gypsies and Travellers do sometimes stop by the roadside or on other land in the city whilst passing through or wanting to access services. In 2011, a review of the 2006 Cambridge Sub-Regional Traveller Accommodation Needs Assessment was undertaken. For Cambridge, it identified that one permanent pitch was needed between 2011 and 2031. This is related to the natural growth of Gypsies and Traveller family groups identified as already in Cambridge. In addition to this, the assessment identified the need for transit or emerging stopping place provision for Gypsies and Travellers in the Cambridge area.

129. Land supply in Cambridge remains limited and there are a number of competing demands. Given the juxtaposition of the built up area alongside the tight administrative boundary, it is difficult to find land that is suitable for site

provision. In order to help with this process, the council needs to develop an appropriate policy in the Local Plan to guide the location of Gypsy and Travellers sites as well as identifying a site or sites suitable for provision. The council is continuing to work with South Cambridgeshire District Council to identify suitable land.

130. In accordance with national guidance, one option (119) was put forward for consideration in the Issues and Options report (2012). This option set out the criteria to guide the location of sites for Gypsy and Traveller provision. The criteria outlined are based on previous national guidance, and good practice guidance along with the current requirements sets out in the Government's national guidance on planning for Gypsy and Traveller sites. This option allowed for the development of a criteria based policy to guide the location of permanent, transit and emergency stopping provision for Gypsy and Traveller sites in Cambridge. It was agreed at Development Plan Scrutiny Sub-Committee in February 2013 that the suggested option be taken forward into the draft Plan with further reference to be made to transit site provision. The approach will address the following issues to guide the quality of provision of permanent, transit and emergency stopping provision for Gypsy and Traveller sites in Cambridge:

- The site should be accessible to local services by public transport, on foot or by cycle;
- There should be safe and convenient vehicular, pedestrian and cycle access to the site;
- The site should provide an acceptable living environment and the health and safety including the public health of the residents should not be put at risk. Factors to be taken into account include flood risk, site contamination, air quality and noise;
- There should not be an unacceptable adverse impact on the amenity of nearby residents or the appearance or character of the surrounding area. The site should respect the scale of the surrounding area and appropriate boundary treatment and landscaping should be capable of being provided;
- Whether the needs of the residents of the sites could be met without putting undue pressure on local services;
- There should be adequate space for vehicle parking, turning and servicing, storage, play and residential amenity; and
- The site should be served or capable of being served by all necessary utilities including mains water, electricity, drainage and sanitation.

131. This approach is consistent with national guidance and allows for the needs of Gypsies and Travellers to be taken into consideration along with other factors including consideration of amenity of nearby residents. Without such an approach, the Council would not have an appropriate policy to assess any future proposals.

132. In order to make provision for Gypsy and Travellers in Cambridge and find an appropriate site, or sites, the Council has used the criteria listed in option 119 to guide the assessment of potential sites across the city. This approach is set out in the Gypsy and Traveller Provision in Cambridge – Site Assessment Process 2012. This document sets out relevant background to Gypsy and Traveller provision both nationally and locally, explains the methodology developed and includes information on all the sites that have been assessed as part of this process. This approach is consistent with the detailed approach the council has taken to preparing the Strategic Housing Land Availability Assessment and has resulted in a thorough assessment of land across the city.
133. The assessment did not identify any appropriate sites within the built up area of Cambridge for Gypsy and Traveller provision. The assessment did not look at land within the Green Belt on the edge of Cambridge on the basis that previous national guidance and the National Planning Policy Framework consider that Gypsy and Travellers' sites are inappropriate development in the Green Belt and should only be approved in very special circumstances. Green Belt boundaries should only be altered in exceptional circumstances, only through the plan making process, and if to meet Travellers' needs sites should be allocated for Travellers only. The Issues and Options consultation asked whether the council should consider sites within the Green Belt for Gypsy and Traveller provision. Whilst many respondents supported the need for pitch provision, concern was expressed about the potential for provision of sites for Gypsies and Travellers within the Green Belt.
134. Due to the interrelationship with land in South Cambridgeshire, the council remains committed to working in partnership with South Cambridgeshire District Council and Cambridgeshire County Council in order to provide appropriate provision in suitable locations. It was noted that respondents were concerned about transport access to existing sites, with the potential to improve the connections between Fen Road and Cowley Road. This issue will be discussed with Cambridgeshire County Council, the highways authority.
135. A number of sites were identified within the urban area and in the Cambridge Green Belt during the Issues and Options consultation in 2012. These sites include:
- Land off Coldham's Lane;
 - A transit site near to Addenbrooke's;
 - Area adjacent to the new station at Northern Fringe East;
 - Beside Babraham Road Park and Ride site.
136. Land off Coldham's Lane adjacent to Cherry Hinton's lakes is heavily contaminated due to its recent history as a landfill site. This site is not considered suitable for use as a Gypsy and Traveller site. In relation to the sites in the Green Belt, the Council has carried out a broad appraisal of the inner Green Belt boundary areas in the context of recent land releases, and how

those releases have affected the revised inner Green Belt boundary. This appraisal was undertaken in May 2012 and sits alongside the Local Plan - Towards 2031 Issues and Options Report (June 2012).

137. There is a need to consider whether any further development sites in the Cambridge Green Belt should deliver Gypsy and Traveller pitch provision. Given the interrelationship of the two authorities, it is important to take into account the approach adopted by South Cambridgeshire District Council. South Cambridgeshire's Issues and Options 1 consultation in 2012 included consultation on provision of Gypsy, Traveller and Travelling Showpeople Accommodation. During consultation, South Cambridgeshire District Council asked whether the Local Plan should require site provision for Gypsy and Traveller accommodation in all new settlements, and other allocated and windfall developments of at least 500 homes. South Cambridgeshire District Council has recently reported through its report to the Portfolio Holder for Planning Policy and Localism on 11 April 2013 that the results of consultation on this issue were mixed, but it was concluded that their policy approach should include seeking opportunities to deliver new sites as part of large scale new communities and significant major development sites. The 500 unit figure has not been used as it is arbitrary and does not reflect and national or local planning or evidence base documents. Given the interdependence of the two authorities and the need to deliver pitch provision, it is considered that both South Cambridgeshire and Cambridge should seek opportunities to deliver new sites as part of large scale new communities and significant major development sites, in order to demonstrate how future needs will be met.

Findings of the Sustainability Appraisal of the Cambridge Local Plan (July 2013)

138. The findings of the Sustainability Appraisal of the draft Cambridge Local Plan noted that the Local Plan considers the accommodation needs of the Gypsy and Traveller population in Policy 49. This policy notes that provision is to be made for at least one permanent pitch for Gypsies and Travellers between 2011 and 2031. This figure is in line with the findings of the 2011 Cambridge sub-Regional GTANA which found that a new pitch would be required to address the demand created by newly forming families and so should result in positive effects. The criteria outlined are based on previous national guidance, and good practice guidance along with the current requirements sets out in the National Planning Policy Framework. This policy can be used to guide the location of permanent, transit and emergency stopping provision for Gypsy and Traveller sites in Cambridge, in order to support the health and wellbeing of gypsies and travellers.

⁹ Cambridgeshire County Council Research Group (2011) Cambridge sub-Regional Gypsy and Traveller Accommodation Needs Assessment [online] available at <http://www.peterborough.gov.uk/pdf/env-plan-evibase%202011%20GTANA.pdf> (accessed 05/2013)

Key Issues raised during Proposed Submission consultation

Policy 49: Provision for Gypsies and Travellers	
Total Representations: 3	
Object: 3	Support: 0
Objections	<ul style="list-style-type: none"> • The 2011 GTANA was seriously flawed because it did not comply with the requirement to engage with the Traveller communities and was based on an in-house modelling exercise, seriously underestimates need and is an inappropriate base for Policy 49. Submission of the plan should be delayed until a fit for purpose needs assessment is carried out; • The figure of one plot also assumes negative population growth, no net migration and ignores those living in bricks and mortar who would prefer to live on caravan sites should there be provision; • A stopping place near Addenbrooke's would greatly improve access for this community; • The city should consider Gypsy and Traveller provision alongside every development; • The policy should provide a specific allocation for pitch provision to meet the need set out in the GTANA; • Amend the policy to alter criterion (f) from "residents" to "residences" to relate to developments and the built environment; • Amend the policy by adding a criterion (j) to read "The site is fully accessible for disabled users".
Support	Not applicable

Minor Modifications suggested following Proposed Submission consultation and implications for Sustainability Appraisal

139. No changes to Policy 49: Provision for Gypsies and Travellers or the supporting text are suggested in the Addendum to the Cambridge Local Plan 2014: Proposed Submission document. There are therefore no impacts on the findings of the Sustainability Appraisal.

Policy 50: Residential Space Standards

EXISTING POLICY TO BE REPLACED (CAMBRIDGE LOCAL PLAN 2006)	OPTION(S) BEING TAKEN FORWARD FROM THE ISSUES AND OPTIONS REPORT (2012) AND ISSUES AND OPTIONS 2 (2013)	OPTION(S) NOT BEING TAKEN FORWARD FROM THE ISSUES AND OPTIONS REPORT (2012)
<ul style="list-style-type: none"> • Not applicable 	<ul style="list-style-type: none"> • Option 106: Minimum standards based on the level of occupancy (bedspaces) • Option 108: Minimum space standards for private outdoor amenity space only • Option 109: General provision of outdoor amenity space • Option I.1: Minimum Internal Space Standards for Residential Development • Option I.3: General Provision of External Amenity Space 	<ul style="list-style-type: none"> • Option 107: Minimum space standards based on a range of dwelling types • Option 110: No space standards specified • Option I.2: Minimum Internal Space Standards for Residential Development (range of Unit Sizes)

Key issues raised during Issues and Options (2012) and Issues and Options 2 (2013) consultations:

SECTION OF THE ISSUES AND OPTIONS REPORT (2012)	KEY ISSUES ARISING FROM CONSULTATION
<p>Option 106 – Minimum standards based on the level of occupancy (bedspaces)</p> <p>AND</p> <p>Option 107 – Minimum space standards based on a range of dwelling</p>	<ul style="list-style-type: none"> • Current developments do not provide sufficient space for ordinary living; • Option 106 should be combined with Option 107 as there are good aspects in both options; • Minimum space standards for principal rooms are desirable but the areas counting towards meeting the standard should have minimum headroom of at least two metres, preferably 2.1. There might be some relaxation for under eaves space but this should be minimal. Gross area for such rooms without any regard to height is not acceptable. All designated bedrooms should be large enough to accommodate an adult, their

SECTION OF THE ISSUES AND OPTIONS REPORT (2012)	KEY ISSUES ARISING FROM CONSULTATION
types	<p>storage and dressing space;</p> <ul style="list-style-type: none"> • Option 106 is preferred to Option 107, which could produce properties that are difficult to adapt or sell in future. Spacious houses sell well and in general people are getting taller and proportionately larger; • Minimum space standard should be based on occupancy levels; • Space standards should be determined by the market. Those able to buy or rent in the open market can exercise choice in terms of the balance between standards, space, affordability and location; • Imposing minimum space standards could adversely affect viability and deliverability of constrained sites, and would reduce the total number of units delivered in the city and the ability to deliver affordable homes and community facilities; • Evidence from the Home Builders Federation shows that whilst dwelling sizes may be smaller in the UK, the average occupancy level of new housing within the UK is amongst the lowest in Europe; • Increasing the size of homes necessarily increases costs to purchasers; • This can be carried out through development control mechanisms for new development and does not need a specific policy. There is no need to repeat other legislation in the Local Plan; • The first bedroom should always be big enough for two people to accommodate changes in circumstances; • A number of respondents considered that Options 106 and 108 would represent a good combination of policies, whilst others considered that Options 107 and 109 would represent a good combination. • Too many dwellings are far too small; • Ceiling heights and principal rooms need minimum height and sizes. There is also a need for cycle, outdoor amenity and garden space; • Developers will not voluntarily do this; • It is in the interests of residents and the non-overdevelopment of a site to do this; • Increasing the size of homes necessarily increases costs to purchasers;

SECTION OF THE ISSUES AND OPTIONS REPORT (2012)	KEY ISSUES ARISING FROM CONSULTATION
<p>Option 108 – Minimum space standards for private outdoor amenity space only</p> <p>AND</p> <p>Option 109 – General provision of outdoor amenity space</p>	<ul style="list-style-type: none"> • There should not be a minimum standard for private outdoor amenity space. This should be determined by the market; • There could be recommended standards for minimum private outdoor amenity space standards but with flexibility to tailor to specific circumstances, for example, it could be reduced if the site is constrained, or if there is a high proportion of public amenity space in close proximity; • To impose a specific minimum requirement will be to constrain development sites coming forward, and will diminish the delivery of housing on certain sites. Each application should simply continue to be considered on merit as at the present time; • The space provided should be appropriate to the development and its location. Gardens that are contiguous have greater amenity and ecological value than separate fragments of land. The overall open space requirement coupled with a common-sense approach on a case by case basis can produce better results; • Minimum space standards need to be set out for outdoor amenity space, though not to the exclusion of other space standards; • Properties need private outdoor space of a reasonable depth and width; • Need for a long-term view of the immeasurable value of private gardens; • A number of respondents considered that Options 106 and 108 would represent a good combination of policies, whilst others considered that Options 107 and 109 would represent a good combination. • Those able to buy or rent in the open market can exercise choice in terms of the balance between standards, space, affordability and location; • Imposing minimum space standards could adversely affect viability and deliverability of constrained sites, and the ability to deliver affordable homes and community facilities; • Evidence from the Home Builders Federation shows that whilst dwelling sizes may be smaller in the UK, the average occupancy level of new housing within the UK is amongst the lowest in Europe;

SECTION OF THE ISSUES AND OPTIONS REPORT (2012)	KEY ISSUES ARISING FROM CONSULTATION
	<ul style="list-style-type: none"> • Increasing the size of homes necessarily increases costs to purchasers; • Whilst well-intentioned, Option 109 may allow too many loopholes to be meaningful.
Option 110 – No space standards specified	<ul style="list-style-type: none"> • Those able to buy or rent in the open market can exercise choice in terms of the balance between standards, space, affordability and location; • Imposing minimum space standards could adversely affect viability and deliverability of constrained sites, and the ability to deliver affordable homes and community facilities; • Evidence from the Home Builders Federation shows that whilst dwelling sizes may be smaller in the UK, the average occupancy level of new housing within the UK is amongst the lowest in Europe; • Increasing the size of homes necessarily increases costs to purchasers; • Standards are critical, no action is not a good option; • The space provided should be appropriate to the development and its location. Gardens that are contiguous have greater amenity and ecological value than separate fragments of land. The overall open space requirement coupled with a common-sense approach on a case by case basis can produce better results.
NEW OPTIONS ARISING FOLLOWING COMMUNITY INVOLVEMENT:	
The only other option suggested was the need for a policy on standards for shared outdoor space for blocks of flats.	

Key issues raised to the Issues and Options 2, Part 2 document

See tables 4 and 5 in the 'how the policy came about' section.

Evidence base:

- Cambridgeshire County Council Research 'Housing Development in Cambridgeshire 2001-2011' August 2011;
- The National Affordable Homes Agency, 721 Housing Quality Indicators (HQI) Form, Version 4 (for NAHP 08-11) published May 2007 and updated April 2008;
- Design and Quality Standards (April 2007) Housing Corporation;
- Cambridge City Council (2008), Affordable Housing SPD (paragraph 26, Page 10-11);

- Housing Act 1985 Part X Overcrowding – 326 The Space Standards, Table II;
- GLA (2009), London Housing Design Guide;
- GLA (July 2011) The London Plan;
- CABE (2005) What Home Buyers Want: Attitudes and decision making among consumers;
- Bartlett K et al. (2002) Consumer Choice in Housing: The beginnings of a housebuyer revolt, Joseph Rowntree Foundation;
- HATC (March 2010) Room to swing a cat? The Amount and Use of Space in New Dwellings in London and the South East;
- GVA Grimley (2010) Draft London Housing Design Guide: Cost and delivery impact assessment, pre-publication draft, London Development Agency.
- Cambridgeshire County Council (July 2012) Census 2011: Cambridgeshire Snapshot.

How the policy came about:

Internal Space Standards

140. The provision of sufficient space within new homes is an important element of good residential design and new dwellings should provide sufficient space for basic daily activities and needs. It is recognised that many new developments are perceived to provide inadequate amounts of both internal and external amenity space. This issue could be addressed by drafting policies on minimum residential unit sizes and external amenity space.
141. The current Local Plan does not include a policy setting out specific internal and external space requirements. However, the council's current Affordable Housing Supplementary Planning Document specifies that Affordable Housing "should meet Housing Corporation Design and Quality Standards or any future replacement."¹⁰ Historically, there has been very limited national guidance on the issues connected with space standards within and around the home, which addresses both market and Affordable Housing. Whilst Planning Policy Statements provided support for the development of residential space and layout standards, paragraph 50 of the National Planning Policy Framework states that Local Planning Authorities should plan for a mix of housing based on current and future demographic trends, market trends and the needs of different groups in the community, such as families with children, the elderly and people with disabilities.
142. A number of options were put forward in the Issues and Options report consulted on during June and July 2012 for policy development on the basis that they outlined the most appropriate way to address this issue. These options were based on national guidance and research undertaken looking at policies set by other Local Planning Authorities. Option 106 proposed

¹⁰Cambridge City Council Affordable Housing Supplementary Planning Document, January 2008, Paragraph 26, Pages 10-11.

developing a policy, which sets out requirements for minimum standards based on bedspaces to be used for all new residential developments and conversions of existing dwellings to residential use. Option 107 suggested developing a new policy outlining the minimum internal floor space and storage space (in terms of gross floor area) for a range of dwelling types. Option 110 meanwhile proposed that the status quo be maintained, by taking the approach of not specifying either internal or external space standards and continuing to use the Homes and Communities Agency standards for all Affordable Housing delivered within the city. Analysis, responses and the preferred approaches to residential space standards are included in Appendix I of this document.

143. The preferred approach agreed at Development Plan Scrutiny Sub-Committee in 2012 was to follow Option 106 on internal space standards. However, within Option 106, following further research of existing standards across the country and consideration of developing a Cambridge-specific approach, it was considered that two main approaches on overall unit sizes require further consultation as a part of Issues and Options 2 (January – February 2013). Briefly, they comprised Option I.1 which originates from the London Housing Design Guide which informed the standards in the adopted London Plan (2011) (hereafter referred to as London Plan standards) and Option I.2, which stems from the Homes and Communities Agency Housing Quality Indicators (2008). As residential space standards are based on the amount of space needed for key items of furniture and circulation space within dwellings, a number of other Local Authorities have already set out their own space standards. Both the London Plan standards and the Homes and Communities Agency approach have been tested by Examination in Public and repeated use through the planning application process. Although the standards were originally developed for housing in London or for Affordable Housing, they are equally applicable for both private and Affordable Housing in Cambridge as they cover a full range of dwelling types and consider the amount of space needed by residents within their dwellings.
144. The unit sizes within the Housing Quality Indicators are given as a range in order to allow some flexibility. The unit sizes provided through the Housing Quality Indicators system vary from those provided in the London Plan, with the largest differences exhibited in the largest dwelling types (11 square metres difference between the top end of the Housing Quality Indicators range and the London Plan standard). This could have an impact on the delivery of Affordable Housing where housing is being funded by grant funding for floorspace up to the level of the Housing Quality Indicator standards only. Additionally, as Housing Quality Indicators provide a range of unit sizes, the use of these unit sizes on a cross-tenure basis across Cambridge could mean that developers might choose to develop private housing at the lowest end of the range of unit sizes.
145. The standards would be applied on a cross-tenure basis, which would allow for the same unit sizes to be applied across Cambridge on both private and

Affordable Housing dwellings. The standards are intended to encourage provision of enough space in dwellings to ensure that homes can be used flexibly by a range of residents with varied needs. The standards also aim to ensure that sufficient storage can be integrated into units. It is also important to consider that these standards are expressed as minimum space standards. Housing which exceeds minimum dwelling sizes will always be encouraged, and in order to achieve certain design configurations, work within site constraints or deliver units to a particular segment of the housing market, designers and developers may need to make early allowance to exceed the minimum gross internal area for that dwelling type.

146. The Issues and Options 2 consultation resulted in the following key issues being raised:

Table 4: Key Issues for Options I.1 and I.2 on Internal Space Standards

Option I.1			Option I.2		
Support:	Object:	Comment:	Support:	Object:	Comment:
14	3	3	2	3	3
Paragraph/ Option/ Question	Key Issues				
Paragraphs I.1 – I.6	<ul style="list-style-type: none"> • Necessary to have policies on internal and external spaces; • Size of the garden should be at least as much as the footprint of the house; • A Cambridge specific standard for all housing should be researched and adopted, but in the interim Option I.1 should be used. • More 3 and 4 bedrooms houses are needed; • Support for housing which exceed minimum unit sizes; • Support for private and Affordable Housing using the same standards. 				
Option I.1	<ul style="list-style-type: none"> • Standards are too high and have little appreciation of market requirements; • Support for a minimum standard; • Space standards proposed in Option I.1 are larger than Option I.2; • Consideration should be given to inclusion of figures for houses of three and four storeys; • Increasing space standards will decrease the viability of homes; • Homes will fall outside the affordability range of buyers; • Better not to have a range of standards (as in Option I.2); • Design layout is more important than space standards; 				

	<ul style="list-style-type: none"> • Increasing demand for storage; • Neither standard is sufficiently big; • Developers will only seek the bare minimum;
Option I.2	<ul style="list-style-type: none"> • Homes will fall outside the affordability range of buyers; • The range proposed in Option I.2 is more realistic and less restrictive, but still lacks appreciation of site context and the balance of accommodation within a schemes; • Provides more leeway than Option I.1; • Need for appreciation of market requirements; • Presents a definitive standard for developers; • Option I.2's unit sizes are too small; • Design layout is more important than space standards; • Neither standard is sufficiently big; • Developers will only seek the bare minimum; • The lowest point of Option I.2 should be set as the minimum.
Question I.2	<ul style="list-style-type: none"> • Size of the kitchen needs to be set in order to encourage cooking; • Bicycle shed or garage needs to take the same number of bicycles as bedspaces; • All new homes should be built to Lifetime Homes Standards; • Need for flexibility for changing needs, including mobility and need to work from home; • Need for homes to be wheelchair accessible; • Does the space standards policy apply to student accommodation?

147. Overall, Option I.1 was supported much more strongly than Option I.2. Some respondents objected to the inclusion of any policy in the Local Plan setting out space standards. These objections were based on concerns about the impact of such standards on the affordability and viability of housing. It should be noted that some research was undertaken on the unit sizes of specific approved developments within Cambridge, in order to ascertain whether the proposed standards in Options I.1 and I.2 were significantly above the norm for Cambridge. A number of assessed schemes coming forward in the city were considered to meet or exceed the proposed standards. Additionally, the viability work on the delivery of Affordable Housing and for the Community Infrastructure Levy included minimum internal space standards for a range of dwelling units based on the London Plan standard in order to help test that building to this standard is viable.

148. A number of respondents also raised concerns about access to developments and people's changing needs, including reference to the use of the Lifetime Homes Standard. These issues are addressed by the policy on Lifetime Homes and Lifetime Neighbourhoods.

External Space Standards

149. Private amenity space can make an important contribution in improving the quality of life of the city's residents and supporting and enhancing local biodiversity. The National Planning Policy Framework sets out the need to seek to secure high quality design and a good standard of amenity for all existing and future occupants of land and buildings as one of the core planning principles in paragraph 17.
150. Within the Issues and Options report, Option 108 proposed developing a policy setting out minimum space standards for private outdoor amenity space only. This would be based on the number of bedspaces within the dwelling and would exclude parking areas and turning spaces. Alternatively, Option 109 suggested the introduction of a policy outlining that all new residential development (both private and affordable) should seek to provide an area of outdoor private amenity space in the form of gardens, balconies, patios and roof terraces. Option 110 meanwhile proposed that the status quo be maintained, by taking the approach of not specifying either internal or external space standards and continuing to use the Homes and Communities Agency standards for all Affordable Housing delivered within the city.
151. The recommendation to Development Plan Scrutiny Sub-Committee in 2012 was to pursue a combination of Options 108 and 109, setting out a flexible, criteria based approach to determine adequate provision of external amenity space for houses and flats. The criteria would include those issues considered to be most influential in the development management process.
152. The rationale for pursuing a mixture of Options 108 and 109 is based on the varied nature of the city and the need to consider context flexibly. Cambridge has a number of areas of varying townscape character, with different densities, dwelling types and sizes, garden sizes and distances between dwellings. A universal approach to external amenity space would not necessarily be contextually suitable. As such, it is considered that a criteria-based approach based on key issues such as location and context, orientation, shape and size of amenity space and its usability, is the most appropriate way forward. Additionally, the number of bedspaces provided by the dwelling will need to be considered in reaching an appropriate solution, providing space for seating, play space, drying and storage space. This approach provides flexibility in design solutions, allowing the local context to be considered.
153. Whilst it is relatively straightforward to ascertain minimum standards for internal residential layout based on the size of standard items of furniture and the need for circulation space within dwellings, outdoor amenity area can also be configured in a similar manner. It is recognised that outdoor amenity space for dwelling units should provide sufficient space to accommodate a table and chairs suitable for the size of dwelling; and where relevant, a garden shed for general storage (including bicycles where no garage provision or cycle storage

to the frontage of the dwelling is possible) and space for refuse and recycling bins; an area to dry washing; circulation space and an area for children to play in. However, dependent on the context of the dwelling and the character of the surrounding area, this external amenity space could range significantly in size. As such, beyond setting out the types of structures and activities expected to be accommodated within a garden or other form of external amenity space, it is not considered appropriate to be prescriptive about minimum garden/balcony depths. It is considered that prescribing a given minimum depth for gardens/balconies would give rise to difficulties in delivering housing on constrained sites. Where a site is constrained, it may still be possible to bring housing forward with more innovative and usable solutions to the delivery of external amenity space. Although a garden length of less than 10 metres might not necessarily constitute a reason to refuse planning consent, it is considerably more likely that an application might be refused where gardens lack privacy and/or usable and accessible space; is dominated by car parking; or is subject to an unreasonable level of overlooking or enclosure.

154. The council undertook further consultation in January and February 2013 on Issues and Options 2. This included Option I.3 on External Amenity Space, which took forward the agreed approach of combining Option 108 and 109 of the Issues and Options Report (2012). The table below sets out the key issues and number of responses to the option I.3 and associated question I.3.

Table 5: Key Issues for Option I.3 on External Amenity Space

Option I.3		
Support: 8	Object: 1	Comment: 6
<ul style="list-style-type: none"> • Important have external amenity space and space to store bicycles; • Good for quality of life; • Suitable play space for children is very important; • Outdoor space should include space for gardening for wellbeing and productivity; • Space at pavement level should be provided for refuse and recycling bins to allow people to pass on collection day; • Spaces need to be designed and located to help create lifetime neighbourhoods; • Agree with the concept of flexible criteria; • One bedroom properties must also allow space for children to play as many families live in one bedroom flats, due to the overheated housing market in Cambridge. 		

155. The response to the setting of criteria to assess the quality and quantity of provision of external amenity space was very positive. The only point of concern was the need for provision of playspace for one-bedroom flats. Whilst it is acknowledged that the Cambridge housing market is overheated and some

families may be living in less than optimum conditions, it is not considered appropriate to aspire to families living in unsuitably sized dwellings.

Findings of the Sustainability Appraisal of the Cambridge Local Plan (July 2013)

156. The approach taken was to establish minimum standards based on the level of occupancy given the specificity of use of bedspaces and the ease of including this information in design and access statements. However, within this approach, following further research of existing standards across the country and consideration of developing a Cambridge-specific approach, it was considered that two main approaches on overall unit sizes required further consultation as a part of Issues and Options 2 (January – February 2013). Briefly, they comprised ‘Option I.1’ which originated from the London Housing Design Guide which informed the standards in the adopted London Plan (2011) and ‘Option I.2’, which stemmed from the Homes and Communities Agency Housing Quality Indicators (2008). Overall, Option I.1 was supported much more strongly than Option I.2.
157. Some respondents objected to the inclusion of any policy in the Local Plan setting out space standards. These objections were based on concerns about the impact of such standards on the affordability and viability of housing. It should be noted that some research was undertaken on the unit sizes of specific approved developments within Cambridge, in order to ascertain whether the proposed standards in Options I.1 and I.2 were significantly above the norm for Cambridge. A number of assessed schemes coming forward in the city were considered to meet or exceed the proposed standards. Additionally, the viability work on the delivery of Affordable Housing and for the Community Infrastructure Levy included minimum internal space standards for a range of dwelling units based on the London Plan standard in order to help test that building to this standard is viable.
158. For external space standards, the approach taken is to pursue a flexible, criteria based policy for determining adequate provision of external amenity space for houses and flats. The criteria include those issues considered to be most influential in the development management process. The preferred approach is essentially a combination of the options set out in Issues and Options report. This approach is appropriate given the varied nature of the city and the need to consider context flexibly. Cambridge has a number of areas of varying townscape character, with different densities, dwelling types and sizes, garden sizes and distances between dwellings. A universal approach to external amenity space would not necessarily be contextually suitable. As such, it is considered that a criteria-based approach based on key issues such as location and context, orientation, shape and size of amenity space and its usability, is the most appropriate way forward. Additionally, the number of bedspaces provided by the dwelling will need to be considered in reaching an appropriate solution, providing space for seating, play space, drying and storage space.

The council undertook further consultation in January and February 2013 on Issues and Options 2. This included Option 1.3 on External Amenity Space, which took forward the agreed approach of combining options from the Issues and Options report.

159. The achievement of high standards of construction in residential development more generally is the focus of Policy 50. This states that new residential developments are only to be permitted where they provide reasonable living conditions, including in terms of room sizes and direct access to an area of private amenity space. This is likely to lead to positive effects and is further supported by Policy 51, which notes that all housing development should adopt the Lifetime Homes Standard and that a percentage of homes should meet the Wheelchair Housing Design Standard; and Policy 47 which calls for housing for people with specific housing needs (such as the elderly and disabled) to be suitable for the intended occupiers, plus accessible to local shops, services, public transport and community facilities.

Key Issues raised during Proposed Submission consultation

Policy 50: Residential space standards	
Total Representations: 15	
Object: 11	Support: 4
Objections	<ul style="list-style-type: none"> • Policy would have an adverse impact on the viability and delivery of sites in Cambridge, particularly smaller sites; • Market-led approach to the design of housing should be pursued; • The policy’s scope should be wider than space and make more reference to design; • Lack of locally derived evidence on space standards; • The minimum floorspaces should be increased, particularly for units for 1 person; • Minimum storage space is vital; • All houses should have external garden space; • Need for adequately sized windows to be referred to, in order to ensure enough natural light; • Amend policy by adding "... below and in dwellings with two or more storeys, with no permanent bedroom on the entrance level, there should be space on the entrance level that could be used as a convenient temporary bed-space." • Add new criterion (h) to read “the amenity should be fully wheelchair accessible.” • Add text to paragraph 6.30 to read “space for a store and charging facility for a scooter or outdoor wheelchair.”
Support	<ul style="list-style-type: none"> • Minimum space standards are important.

Minor Modifications suggested following Proposed Submission consultation and implications for Sustainability Appraisal

160. No changes to Policy 50: Residential space standards or the supporting text are suggested in the Addendum to the Cambridge Local Plan 2014: Proposed Submission document. There are therefore no impacts on the findings of the Sustainability Appraisal.

Policy 51: Lifetime Homes and Lifetime Neighbourhoods

EXISTING POLICY TO BE REPLACED (CAMBRIDGE LOCAL PLAN 2006)	OPTION(S) BEING TAKEN FORWARD FROM THE ISSUES AND OPTIONS REPORT (2012) AND ISSUES AND OPTIONS 2 (2013)	OPTION(S) NOT BEING TAKEN FORWARD FROM THE ISSUES AND OPTIONS REPORT (2012)
<ul style="list-style-type: none"> Policy 5/9 Housing for People with Disabilities 	<ul style="list-style-type: none"> Option 111: Lifetimes Homes standard applied to all development Option 113: A proportion of new homes that meet the Wheelchair Housing Design Standard 	<ul style="list-style-type: none"> Option 112: A proportion of new homes to meet Lifetime Homes standard

Key issues raised during Issues and Options (2012) and Issues and Options 2 (2013) consultations:

SECTION OF THE ISSUES AND OPTIONS REPORT (2012)	KEY ISSUES ARISING FROM CONSULTATION
<p>Option 111: Lifetimes Homes standard applied to all development</p>	<ul style="list-style-type: none"> All new homes should be designed for safe and comfortable movement in and around them. If Cambridge were to adopt a Housing Design standard that required specific justification for raised thresholds, steps or narrow doorways, most of the Lifetime Homes criteria would become the norm, and people would not be excluded from parts of their own or their friends' houses by mobility problems; All new homes should include the provisions of lifetime homes as the costs are modest and it will only have the effect of slightly increasing the area of the dwelling; Options 111 and 113 impose a requirement for 100% Lifetime Homes and a proportion of housing to meet Wheelchair Housing Design Standards, which would

SECTION OF THE ISSUES AND OPTIONS REPORT (2012)	KEY ISSUES ARISING FROM CONSULTATION
	<p>result in an unnecessarily adverse impact on the viability of the development, and would increase the challenge of successfully developing constrained sites. The requirement for Lifetime Homes and Wheelchair Housing Design Standards should reflect local needs and the characteristics of a site;</p> <ul style="list-style-type: none"> • Option 112 would be more appropriate, although additional flexibility should be incorporated to ensure that viability is not adversely affected, by including the wording "unless not viable"; • Space needs are greater not only for physically disabled people but for people with other forms of disability e.g. learning disability, for example when they require a carer or carers all the time or for most of the time. Autistic people may not be able to go out very often because of the lack of adequate support and it has been known for some time that many disabled children (including autistic children) need extra room at home so that they can play; • It should be a mandatory assessment with a system of awards; • Fiscal incentives should be introduced to make attractive to many of those living in larger houses (e.g. single occupation of family homes) to downsize/smartsize, freeing up accommodation to those who have families.
<p>Option 112: A proportion of new homes to meet Lifetime Homes standard</p>	<ul style="list-style-type: none"> • Option 112 would be more appropriate than Option 111, although additional flexibility should be incorporated to ensure that viability is not adversely affected, by including the wording "unless not viable"; • With changing demographics and health needs and with the aim of helping people to continue to live independently, we should aspire to design homes that are as flexible as possible; • All new housing should be built to Lifetime Homes standard; • Support a combination of 112 and 113, say 10% wheelchair housing design standard and a further 15% to Lifetime Home standard. This would improve our performance on this issue (an important one given our ageing population and historical failure to anywhere near meet the needs of the disabled), while not imposing too high a standard for developers;

SECTION OF THE ISSUES AND OPTIONS REPORT (2012)	KEY ISSUES ARISING FROM CONSULTATION
	<ul style="list-style-type: none"> • Support Option 112 if the proportion of new homes to meet Lifetime Homes Standards is increased from 15%;
Option 113: A proportion of new homes that meet the Wheelchair Housing Design Standard	<ul style="list-style-type: none"> • There are increasing numbers of disabled and elderly people; • Needs can change very swiftly, so housing should be adaptable to suit those changing needs; • Options 111 and 113 impose a requirement for 100% Lifetime Homes and a proportion of housing to meet Wheelchair Housing Design Standards, which would result in an unnecessarily adverse impact on the viability of the development, and would increase the challenge of successfully developing constrained sites. The requirement for Lifetime Homes and Wheelchair Housing Design Standards should reflect local needs and the characteristics of a site; • Option 112 would be more appropriate, although additional flexibility should be incorporated to ensure that viability is not adversely affected, by including the wording "unless not viable"; • Support a combination of 112 and 113, say 10% wheelchair housing design standard and a further 15% to Lifetime Home standard. This would improve our performance on this issue (an important one given our ageing population and historical failure to anywhere near meet the needs of the disabled), while not imposing too high a standard for developers.
NEW OPTIONS ARISING FOLLOWING COMMUNITY INVOLVEMENT:	
No alternative options have been suggested.	

Evidence base:

- www.lifetimehomes.org.uk;
- HM Government, Building Regulations Part M Access to and use of buildings (2004, incorporating 2010 amendments)
- BRE (July 2012) Modelling the current and potential accessibility of the housing stock
- BRE (July 2012) Assessing the health benefits of Lifetime Home
- Building Cost Information Service (BCIS) (July 2012) Assessing the cost of Lifetime Homes Standards
- Levitt Bernstein (July 2012) Analysis of distribution of housing typologies in Public and Private Sector and typical compatibility with the Lifetime Home Standard
- Levitt Bernstein (September 2009) Impact on Site Density of Lifetime Homes

- Hunt Thomson Architects (July 2012) Design of Lifetime Homes
- Habinteg (July 2012) Lifetime Homes technical forum
- Thorpe, S. (2006) 2nd Edition Wheelchair Housing Design Guide. Can be accessed at: <http://www.habinteg.org.uk/main.cfm?type=WCHDG>
- Habinteg/JRF (2003), Lifetime Homes: Living well together- achieving sustainable flexible homes in higher density neighbourhoods.
- Cambridge City Council (2009) Developing Affordable Housing Policy Guide.
- Cambridge City Council (2012) Housing Strategy 2012 – 2015.
- Cambridgeshire County Council, Joint Strategic Needs Assessment, available at <http://www.cambridgeshirejsna.org.uk/>
- Habinteg Housing Association and London South Bank University (2010) Mind the Step: An estimation of housing needs amongst wheelchair users in England. This document can be accessed at: http://www.habinteg.org.uk/mediaFiles/downloads/53930501/Mind_the_step_onlineversion_pdf.pdf

How the policy came about:

161. The National Planning Policy Framework (paragraph 50) sets out the need to deliver a wide choice of high quality homes, widen opportunities for home ownership and create sustainable, inclusive and mixed communities. In order to do this, local planning authorities should plan for a mix of housing based on current and future demographic trends, market trends and the needs of different groups in the community (such as, but not limited to, families with children, older people, people wishing to build their own homes).
162. Current Building Regulations (Part M as amended) requires new developments to have a minimum standard of accessibility to and into the entrance level of a building. However, these minimum statutory standards provide only limited usability within the home for a disabled person. The level entrance should be the principal entrance from the major highway leading to the house and that this level of the building must contain reception room(s).

Lifetime Homes

163. The Lifetime Homes Standard (November 2011) is a widely used national standard, which uses technical advice to ensure that the spaces and features in and around new homes can readily meet the needs of most people, including those with reduced mobility. The website www.lifetimehomes.org.uk states that lifetime homes are “ordinary homes incorporating 16 design criteria that can be universally applied to new homes at minimal cost. Each design feature adds to the comfort and convenience of the home and supports the changing needs of individuals and families at different stages of life.” The premise is that homes meeting the standard represent flexibility and adaptability. Having homes built to the sixteen points of the Lifetime Homes Standard helps to ensure that housing suits householders’ needs and changing circumstances. Each design feature adds to the comfort and convenience of the home and

supports the changing needs of individuals and families at different stages of life.

164. At present, local authorities and health authorities bear the cost of adapting housing and re-housing people who become disabled. This budget is unlikely to expand and will encounter more demand with an aging population and people living longer with profound disabilities and illnesses. Lifetime Home provision will help reduce future costs and will not require considerable resources to make further adaptations for people who become disabled.
165. The Government's strategy required all new housing built with public funding to meet the Lifetime Home standard by 2011. There have been a number of studies into the costs and benefits of building to the Lifetime Homes standard¹¹. These have concluded that the costs range from £545 to £1,615 per dwelling, depending on:
- the experience of the home designer and builder;
 - the size of the dwelling (it is easier to design larger dwellings that incorporate Lifetime Homes standards cost-effectively than smaller ones);
 - whether Lifetime Homes design criteria were designed into developments from the outset or whether a standard house type is modified (it is more cost effective to incorporate the standards at the design stage rather than modify standard designs); and
 - any analysis of costs is a 'snapshot' in time. The net cost of implementing Lifetime Homes will diminish as the concept is more widely adopted and as design standards, and market expectations, rise.
166. The most significant factor when considering costs was whether the home had been designed to incorporate Lifetime Homes criteria from the outset or whether a standard design had been modified.¹² Additionally, the website www.lifetimehomes.org.uk also references a study that concluded Lifetime Homes did not have a significant impact on overall project costs because the requirements of the revised Part M of Building Regulations now require many of the same considerations to be addressed as a matter of course.
167. Requiring all new housing development to meet the Lifetime Homes Standard would help to provide a flexible and adaptable supply of housing to suit the needs and changing circumstances of all members of the community. Option 111 in the Issues and Options Report 2012 set out the requirement for all homes to be built to Lifetime Homes standards. Whilst the internal requirements of Lifetime Homes are fairly straightforward to achieve and

¹¹ A number of studies can be accessed at Housing LIN: Lifetime Housing Standards research findings at http://www.housinglin.org.uk/Topics/browse/Design_building/LifetimeHomes/Standards/?parent=8576&child=8564

¹² Levitt Bernstein, 2009 Impact on site density of Lifetime Homes. Can be accessed at webarchive.nationalarchives.gov.uk/20120919132719/.../2180877.pdf

relate well to other standards such as the London Plan and Homes and Communities Agency's residential space standards, the external space standards can be more difficult to achieve on all sites, particularly in relation to parking layout and level access from this to the home, the approach adopted in the policy's supporting text reflects the work of the DCLG Lifetime Homes Technical Forum and the Greater London Authority, Joseph Rowntree Foundation and Habinteg¹³. Viability testing of residential development in setting the draft Community Infrastructure Levy charges has factored in Lifetime Homes and Affordable Housing policy thresholds and percentages and found the policy not to harm viability. Paragraph 173 of the National Planning Policy Framework is clear that the sites and scale of development identified in the Local Plan should not be subject to such a scale of obligations and policy burdens that their ability to be developed viably is threatened. It states that:

“In order to ensure viability, the costs of any requirements for affordable housing, standards, infrastructure contributions or other requirements should, when taking account of the normal cost of development and mitigation, provide competitive returns to a willing landowner and willing developer to enable the development to be deliverable.”

168. The potential impacts of this policy on viability have been taken into account in a suite of viability documents produced on behalf of the council. These are the Cambridge City Council Local Plan – Community Infrastructure Levy Viability Assessment; the Cambridge City Council Local Plan - SHLAA and Potential Site Allocations High Level Viability Assessment; and, the Cambridge City Council Local Plan – Student Housing Affordable Housing Study.
169. The alternative approach of setting a percentage approach (Option 112 of the Issues and Options report 2012) would on the other hand require Development Management officers to ascertain which dwellings were meeting Lifetime Homes and whether this complied with the policy. This alternative approach misunderstands the fundamental nature of Lifetime Homes as an application of the principle of inclusive design which tries to ensure that all designs are suitable for the full diversity of users and can be adapted to meet the diversity of needs of that user throughout their lifetime. Someone who develops mobility difficulties during their lifetime would then face the lottery of whether they lived in the percentage of houses, which met the standard.
170. As Lifetime Homes design standards can be incorporated into development at an early stage and are already required for all Affordable Housing delivered in the city, it is considered appropriate to set out a requirement for all homes to comply with Lifetime Homes standards. However, the supporting text of the policy identifies that some of the criteria, such as the criterion on parking provision, may not be fully met on some sites. Some flexibility may need to be applied in relation to the parking element of Lifetime Homes, as rigid

¹³ Habinteg/JRF (2003), Lifetime Homes: Living well together- achieving sustainable flexible homes in higher density neighbourhoods.

application particularly in high density settings can result in poor urban design. The expectation will be that all homes are designed with the potential to be altered in the future for the changing needs of their occupants.

Wheelchair Housing Design Standard

171. As noted by the Lifetime Homes website, whilst Lifetime Homes can accommodate or adapt to the needs of many wheelchair users, the standard does not match the enhanced accessibility provided by a property constructed to the Wheelchair Housing Design Standard.¹⁴
172. The Council's current approach to Affordable Housing requires at least 2% of new Affordable Housing to be fully wheelchair accessible, and a further 8% to meet other specialist needs as required. It also requires all new Affordable Homes to be built to the Lifetime Homes standard as a minimum. In the Council's Housing Strategy 2012 – 2015, the Council aims to review its requirements around the Lifetime Homes Standard for new Affordable Homes, the percentage of wheelchair accessible homes on new developments, and to consider how it can ensure that new homes are designed in a way that disabled adaptations can easily be fitted in the future if required. The Council also confirms that it will continue to identify the need for specialist housing for people with physical and/or sensory disabilities, and explore, in the longer term, how better use can be made of the private sector in helping disabled people to access appropriate housing. In London, the London Plan requires 10% of all new homes to be built to be easily adaptable to become fully wheelchair accessible.
173. The NHS in 2000 estimated that wheelchair users made up around 2% of the population of England. However, there has not historically been a nationally adopted standard practice for identifying the housing needs of wheelchair users. The research report *Mind the Step: An estimation of housing needs amongst wheelchair users in England*¹⁵ was published by Habinteg Housing Association and London South Bank University in 2010. Its conclusions highlight that wheelchair users face particular design and accessibility barriers, both in and around the home and in the wider environment. The majority of homes in England (84%) do not allow someone using a wheelchair to get to and through the front door without difficulty and only 0.5% of homes are reported to be 'accessible and adaptable'. The 2010 report presents national and regional estimates of housing need among wheelchair users in England and

¹⁴ Thorpe, S. (2006) 2nd Edition Wheelchair Housing Design Guide. Can be accessed at: <http://www.habinteg.org.uk/main.cfm?type=WCHDG>

¹⁵ Habinteg Housing Association and London South Bank University (2010) *Mind the Step: An estimation of housing needs amongst wheelchair users in England*. This document can be accessed at: http://www.habinteg.org.uk/mediaFiles/downloads/53930501/Mind_the_step_onlineversion_pdf.pdf

shows how these figures can be used to produce similar estimates at local authority level.

174. As part of its statutory duty as the local housing authority, the council maintains a list of households who have applied for social housing accommodation. Of these applicants who are classified as in urgent housing need: 21 (0.32% of all people on the register) are currently in need of a home suitable for indoor and outdoor wheelchair use; and 18 (0.2% of the register) are unable to manage steps or stairs and may use a wheelchair at certain times. (It should be noted though, that the Council's housing (Home-Link) register is currently being reviewed, and it is expected that these numbers may reduce, at least in the short term). According to the Census 2011, 3.64% of Cambridge residents considered themselves to have had bad or very bad general health in the previous year, whilst 12.97% of Cambridge residents stated that they had a long-term activity limiting illness. Additionally, within the 16 – 74 age group of Cambridge residents, 2,437 people stated that they were not working due to illness or disability. However, the Census 2011 figures will not show all disabled people and not all of those included in the figures will be disabled.
175. Cambridgeshire Joint Strategic Needs Assessment data suggests that across England as a whole, 0.19% of wheelchair users are estimated to be in unsuitable accommodation.
176. The report *Mind the Step* suggests a formulaic approach to calculate a crude estimate of unmet need for wheelchair user housing within a local authority area. This estimate is based on the authors' assessment of need for each English region, applied as a proportion of households within the local authority area. The 2011 Census counted around 46,714 households in Cambridge. As such, the estimate of unmet need, using the regional estimates from *Mind the Step*, would be calculated as follows:

Approximate unmet need =
46,714 households
x 2% (i.e. wheelchair user households in the East of England)
x 9% (% of wheelchair user households with unmet housing need)
= 84 households in Cambridge with unmet need (or 0.2% of all Cambridge's households)

177. The method for producing an indicative local authority estimate is set out in paragraph 5.1 of *Mind the Step* and involves taking the regional figure for the percentage of all households that are wheelchair user households (Table 3, Column 4, Page 34) and multiplying this by the number of all households in the local authority. This gives an estimate for the number of wheelchair user households. The report then advises multiplying this by the regional figure for the percentage of wheelchair user households with unmet housing need (Table 3, Column 5, Page 34).

178. With regard to adaptations, it is important to bear in mind that the figure for unmet housing need set out as a result of the *Mind the Step* approach only relates to wheelchair user households. While wheelchair users will sometimes (but by no means always) need relatively major adaptations if living in an unsuitable home, in numerical terms they comprise about 12% of disabled people and so there will be many others who also require support through provision of adaptations.
179. A number of local authorities have adopted policy that requires 10% of all new homes should be built to full Wheelchair Housing Design Standard or to a point which is readily adaptable for wheelchair users. The number of new wheelchair user homes produced in this way will obviously depend on the total number of properties built. Having worked out its estimate of unmet need, a local authority will be able to see what proportion of the unmet housing need will (or would) be met – and over what period of time – by an effective percentage-based policy. This can then inform decisions about the projected balance between new build, adaptations and allocations. In relation to the Wheelchair Housing Design Standard, it is considered that market and Affordable Housing in Cambridge should be considered in the same manner, subject to viability.
180. It is proposed that 5% of all new housing development of 20 or more self-contained units should be provided as housing which would suit the needs of wheelchair users. The percentage and threshold were reached by applying different percentages of homes meeting the Wheelchair Housing Design Standard (e.g. 3%, 5%, 10%) to all sites without planning permission in Cambridge, which would be likely to be developed by 2031. The sites identified and tested for each percentage used a set threshold in order to allow at least one house built to Wheelchair Housing Design Standard to be delivered. The sites include allocated sites without planning permission; sites identified through the Strategic Housing Land Availability Assessment (SHLAA); sites potentially to be removed from the Green Belt for housing; and windfall sites (with a 20% discount applied).

Table 6: Number of units to be delivered to Wheelchair Housing Design Standard

Percentage	Threshold (Units)	Estimated Number of units to be delivered to Wheelchair Housing Design Standard if all sites came forward
3%	34	57
5%	20	117
10%	10	362

181. Applying 5% as the percentage and 20 units as the threshold for delivery of a minimum of one unit built to Wheelchair Housing Design Standard would allow the delivery of 117 units, which is close to the number reached by using the

Mind the Step formula of 84 households being in unmet need for wheelchair appropriate housing.

Findings of the Sustainability Appraisal of the Cambridge Local Plan (July 2013)

182. The findings of the Sustainability Appraisal of the draft Cambridge Local Plan notes that Policy 51 notes that all housing development should adopt the Lifetime Homes Standard and that a percentage of homes should meet the Wheelchair Housing Design Standard. The Sustainability Appraisal acknowledges that whilst the *internal* requirements of Lifetime Homes are fairly straightforward to achieve and relate well to other standards such as the London Plan and Homes and Communities Agency’s residential space standards, the *external* space standards can be more difficult to achieve on all sites, particularly in relation to parking layout and level access from this to the home. However, viability testing of residential development in setting the draft Community Infrastructure Levy charges has factored in both Lifetime Homes and Affordable Housing policy thresholds and percentages and found the policy approaches not to harm viability. As such, it was considered that the option requiring all homes to be Lifetime Homes was not overly onerous and hence it has been taken forward. Requiring a percentage of homes to be delivered to Lifetime Homes is not favoured on the basis that it misunderstands the fundamental nature of Lifetime Homes as an application of the principle of inclusive design which tries to ensure that all designs are suitable for the full diversity of users and can be adapted to meet the diversity of needs of that user throughout their lifetime. On balance, this approach is in keeping with the findings of interim Sustainability Appraisal, which recognised shortcomings in both identified options.

Key Issues raised during Proposed Submission consultation

Policy 51: Lifetime Homes and Lifetime Neighbourhoods	
Total Representations: 11	
Object: 8	Support: 3
Objections	<ul style="list-style-type: none"> • Policy should provide an evidence base for the required ratio of Lifetime Homes; • Cost of Lifetime Homes has not been sufficiently factored in and may render development unviable, particularly for flatted development; • Policy does not reflect national policy for wide choice and inclusive and mixed communities; • New development should also meet Building for Life standards; • Higher percentage of wheelchair housing is needed; • Amend criterion (b) by removing ", or be easily adapted to meet them."; • Amend policy text by replacing "Compliance with the criteria should be demonstrated in the design and access statement

	<p>submitted with the planning application." with text to read "Compliance with the Lifetime Homes and Wheelchair Housing Standards criteria should be specifically demonstrated in the design and access statement submitted with the planning application."</p> <ul style="list-style-type: none"> • Add text to paragraph 6.34 after "...Lifetime Homes standards." with "... Lifetime Homes standards, but, in view of the liability of students to temporary disability and in the interests of extended usage, should include simple features of general accessibility such as clutch bars in showers. They should also be visitable by students, friends, family and college/university staff who are disabled." • Replace paragraph 6.35 with "The Lifetime Homes standard will be applied to all developments of self-contained housing, including flat conversions, where reasonable and practical. It is acknowledged that a few schemes might not meet every detail of standards, for example where parking spaces are, but it is considered that each scheme should achieve as many features as possible." • Paragraph 6.36 should also be applied to Buildings of Local Interest.
Support	<ul style="list-style-type: none"> • New development should be able to meet changing needs, particularly those of an ageing population; • Lifetime Homes principles already applied in the design of our new homes (Berkeley Homes).

Minor Modifications suggested following Proposed Submission consultation and implications for Sustainability Appraisal

183. As a result of assessment, two minor modifications are suggested for Policy 51: Lifetime Homes and Lifetime Neighbourhoods and paragraph 6.35 of the supporting text. Both changes are in the Addendum to the Cambridge Local Plan 2014: Proposed Submission document marked as PM/6/007 and PM/6/008.

184. PM/6/007 suggests that Policy 51, criterion (b) reads:

“b. 5 per cent of every housing ~~schemes~~ development providing or capable of acceptably providing 20 or more self-contained homes, including conversions and student housing, should either meet Wheelchair Housing Design Standards, or be easily adapted to meet them.”

185. To reduce conflict between the policy and supporting text, for clarity PM/6/008 suggests that paragraph 6.35 reads:

“The Lifetime Homes standard will be applied to all developments of self-contained housing, including flat conversions, where reasonable and practical.

~~It is acknowledged that the design or nature of some existing properties and proposed development sites means that it will not be possible to meet every element of the Lifetime Homes standard, for example in listed buildings or on very constrained urban sites, but it is considered that each scheme should achieve as many features as possible."~~

186. Following consideration of the impact of these changes on the Sustainability Appraisal Framework, it has been concluded that these changes do not materially alter the findings of the Sustainability Appraisal.

Policy 52: Protecting Garden Land and the Subdivision of Existing Dwelling Plots

EXISTING POLICY TO BE REPLACED (CAMBRIDGE LOCAL PLAN 2006)	OPTION(S) BEING TAKEN FORWARD FROM THE ISSUES AND OPTIONS REPORT (2012) AND ISSUES AND OPTIONS 2 (2013)	OPTION(S) NOT BEING TAKEN FORWARD FROM THE ISSUES AND OPTIONS REPORT (2012)
<ul style="list-style-type: none"> Policy 3/10 Sub-division of Existing Plots 	<ul style="list-style-type: none"> Option 114: Criteria based policy for small scale residential development and infill development in the rear of gardens 	<ul style="list-style-type: none"> Option 115: Policy to restrict infill development in rear gardens

Key issues raised during Issues and Options (2012) and Issues and Options 2 (2013) consultations:

SECTION OF THE ISSUES AND OPTIONS REPORT (2012)	KEY ISSUES ARISING FROM CONSULTATION
Option 114: Criteria based policy for small scale residential development and infill development in the rear of gardens	<ul style="list-style-type: none"> Measured policy option which does not preclude development where appropriate and design standards are high; Option 114 is preferable to Option 115, which does not provide sufficient flexibility to consider local circumstances for infill development in rear gardens. Option 114 provides adequate criteria to ensure such development is appropriate; The option helps provide additional housing with a variety of designs to enhance the city's landscape; It reduces the pressure on Green Belt land; Gardens are a precious commodity and a defining quality to areas; Loss of amenity space coupled with problems posed by flooding make this option unwise;

SECTION OF THE ISSUES AND OPTIONS REPORT (2012)	KEY ISSUES ARISING FROM CONSULTATION
	<ul style="list-style-type: none"> • Deterioration of quality of life.
Option 115: Policy to restrict infill development in rear gardens	<ul style="list-style-type: none"> • Protection should be given to gardens with mature trees; • Gardens are vital for biodiversity; • Gardens are a precious commodity and a defining quality to areas; • Gardens are an important part of reducing flood risk; • Very specific local circumstances could support this approach; • There is a presumption against development of gardens; • Deterioration of quality of life; Whilst welcoming a tougher policy stance on infill development in rear gardens, this should not preclude redevelopment on derelict sites; • Option 114 is preferable to Option 115, which does not provide sufficient flexibility to consider local circumstances for infill development in rear gardens. Option 114 provides adequate criteria to ensure such development is appropriate; • This option does not result in a balanced approach; • The amount of green space in residential areas needs addressing; • Need to restrict infill in existing areas of high density development.
NEW OPTIONS ARISING FOLLOWING COMMUNITY INVOLVEMENT:	
<p>One respondent suggested that there should be a hierarchy to 'sites' based on back gardens. If the garden is too large then sub-division into garden and allotment should be the first consideration. If there is a general agreement in an area that their gardens are too large amalgamation to provide public open space or amenity, e.g. tennis courts, should be the next consideration. This would preserve the benefit of green space within the city without making demands on infrastructure. Another respondent suggested a combination of both options, whilst another respondent suggested that permitted development rights needed to be restricted so that buildings in back gardens cannot become residential accommodation.</p>	

Evidence base:

- National Planning Policy Framework (2012);
- Cambridge City Council Conservation Area Appraisals (various dates) – provide contextual information.
- Natural Environment and Rural Communities Act 2006

- Cambridge City Council Sustainable Design and Construction Supplementary Planning Document (June 2007)
- Cambridge City Council Nature Conservation Strategy (November 2006)

How the policy came about:

187. In recent years, garden development has become a contentious issue. The National Planning Policy Framework (paragraph 53) states that “Local planning authorities should consider the case for setting out policies to resist inappropriate development of residential gardens, for example where development would cause harm to the local area.” Additionally, the definition of previously developed land within the National Planning Policy Framework excludes private residential gardens.
188. In many cases, though, development on garden land may be regarded as entirely appropriate and there are many clear, definable benefits to such development. They reduce the need to extend development out into the Green Belt and the wider countryside, create new homes without the need for significant additional infrastructure provision, provide better utilisation of land in areas where people no longer require large gardens due to changing lifestyles. For these reasons, garden land development may add to housing stock in ways that are sustainable and which meet identified local housing need.
189. There are also many arguments against developing on gardens. They may lead to increased building mass, loss of character, increased population density and a gradual associated increase in demand on local infrastructure. Environmentally, garden development can result in a loss of green space and paving over gardens; a reduction in habitats and biodiversity; and an increased risk of flash flooding due to increased run off.
190. Policy 3/10 Sub-division of Existing Plots in the Cambridge Local Plan 2006 has been used on a number of occasions in recent years to address residential development within the garden area or curtilage of existing properties. This policy was drawn up as it was recognised that whilst the provision of new dwellings within the curtilage of existing properties provides opportunities for additional homes in the City, the development of existing gardens or curtilages needs to be handled carefully in order to avoid creating new developments, which adversely affect the amenities of local residents or the character of the area. In order to clarify the use of this policy in the light of a change in approach to garden land at a national level, an advice note was produced on development affecting private gardens in Cambridge in June 2011.
191. Within the Issues and Options report (2012), the Council put forward two options (114 and 115). Option 114 suggested the development of a criteria-based policy for small scale residential development in gardens, whilst Option 115 set out the potential to restrict development in gardens. The Interim

Sustainability Appraisal, which accompanied the Issues and Option report, suggested that Option 114 is likely to help increase delivery of much-needed new housing in Cambridge. However, this option is also likely, depending on location, to be at the cost of biodiversity and green infrastructure, flood risk including climate change adaptation, and landscape. However, in areas of existing low density development or where existing buildings are demolished, this policy could potentially achieve new housing without compromising sustainable communities. Potential adverse effects of this option would be most acutely felt in areas already experiencing significant pressure on green space within the urban area. This option is likely to increase pressures on levels of personal car use, including pressures on car parking,

192. Option 115 which suggested the restriction of infill development would potentially restrict the potential delivery of much needed housing, although the wording to require 'very specific local circumstances' suggests this option would be developed to minimise its application. It would help contribute positively to addressing many sustainability issues relating to biodiversity and green infrastructure and maintaining local townscape.
193. Whilst new residential development is welcomed in addressing housing need, the development of existing gardens or curtilages needs to be handled carefully in order to avoid creating developments, which adversely affect the amenities of local residents and the character of the area. It is considered that there is a need to have a measured policy approach, which does not preclude development, where appropriate. As such, given the mixed character, density and form of existing residential development within the city, it is appropriate to take forward a criteria based approach, which would allow flexibility to consider local circumstances.
194. This policy approach would cover sites where:
 - an existing house or houses are retained and new dwellings are erected in the garden or multiple garden areas or curtilage; and/or
 - the existing buildings are demolished and the plot(s) sub-divided in order to make way for further residential development.
195. Reference is not merely be made to infill development within rear gardens, as this type of development can affect the whole curtilage of a property. The proposed criteria based policy is positively worded and include criteria on the following issues:
 - The character and appearance of the area;
 - Form and density of the proposed development;
 - Amenities of neighbouring properties;
 - Provision of adequate amenity space, vehicular access arrangements and parking spaces for the proposed and existing properties;
 - Effect on the comprehensive development of the wider area.

196. In terms of alternative options, there was a suggestion that there should be a hierarchy to 'sites' based on back gardens, which could lead to large gardens being subdivided and used for public open space or amenity. Due to the challenges of land assembly, this approach will not be pursued through the Local Plan Review. In relation to restricting permitted development rights in order to prevent buildings in back gardens from becoming residential accommodation, this cannot be undertaken through the Local Plan Review process. It would need to result from either national changes to permitted development rights or through the introduction of an Article 4 direction. The Council has not followed this approach, considering a city-wide Article 4 direction disproportionate and with significant revenue cost implications, either through compensation claims or as a result of the increased planning casework load arising from otherwise permitted development proposals, which would not attract a fee.

Findings of the Sustainability Appraisal of the Cambridge Local Plan (July 2013)

197. The findings of the Sustainability Appraisal of the draft Cambridge Local Plan were that Policy 52 would afford greater protection to gardens, with likely positive effects in terms of flood risk. Policy 52 also notes that development on part of a garden or group of gardens will only be permitted where amenity and privacy is appropriately protected and so is likely to result in positive effects, although the need for residential accommodation should be balanced against the environmental impacts. The criteria-based policy approach has been taken forward as it is likely to help increase delivery of much-needed new housing in Cambridge. In areas of existing low density development or where existing buildings are demolished, this policy could potentially achieve new housing without compromising sustainable communities and the quality of the environment. On balance, this approach is in keeping with the findings of interim Sustainability Appraisal which recognised shortcomings in both identified options.

198. The interim Sustainability Appraisal considered that there should be greater consideration of the wildlife value of gardens. As such, the Council amended the policy to make additional reference the biodiversity of gardens and any trees worthy of retention.

Key Issues raised during Proposed Submission consultation

Policy 52: Protecting garden land and the subdivision of existing dwelling plots	
Total Representations: 6	
Object: 4	Support: 2
Objections	<ul style="list-style-type: none"> • Set a quantitative standard for development of garden land or other prescriptive definitive criteria to have a minimum impact on surrounding area; • Use standards set out for residential space standards to ensure sufficient space for residents; • Add reference to access and impact on local transport networks to policy; • Add reference to cycle parking provision in the policy; • Paragraph 6.37 should also refer to replacement of existing non-residential structures such as garages, sheds, farm structures etc. • In reference to paragraph 6.38, gardens are important everywhere in the city, not just in its more verdant, arcadian quarters; • In reference to paragraph 6.38, gardens can also provide food growing places and this should be referred to here.
Support	<ul style="list-style-type: none"> • Gardens are important resources of community value; • Garden grabbing has often resulted in unsuitable design.

Minor Modifications suggested following Proposed Submission consultation and implications for Sustainability Appraisal

199. As a result of a representation (Representation Number 27174) made during the Proposed Submission consultation, a minor modification to paragraph 6.38 of the supporting text to Policy 53: Protecting garden land and the subdivision of existing plots is suggested. This change is in the Addendum to the Cambridge Local Plan 2014: Proposed Submission document marked as PM/6/009. PM/6/009 suggests that paragraph 6.38 reads:

“Gardens are an important environmental resource and are a vital component of Cambridge’s character, ~~especially in its more verdant, arcadian quarters.~~ They form part of an area's development pattern, providing a setting for buildings, which in turn informs the prevailing privacy and amenity enjoyed by residents. They provide space for food production and a semi-natural habitat for local wildlife and corridors for the movement of wildlife through the urban environment. Collectively, they help to mitigate fluvial and surface water flooding in otherwise built-up parts of the city.”

200. Following consideration of the impact of this change on the Sustainability Appraisal Framework, it has been concluded that this change does not materially alter the findings of the Sustainability Appraisal.

Policy 53: Flat Conversions

EXISTING POLICY TO BE REPLACED (CAMBRIDGE LOCAL PLAN 2006)	OPTION(S) BEING TAKEN FORWARD FROM THE ISSUES AND OPTIONS REPORT (2012) AND ISSUES AND OPTIONS 2 (2013)	OPTION(S) NOT BEING TAKEN FORWARD FROM THE ISSUES AND OPTIONS REPORT (2012)
<ul style="list-style-type: none"> Policy 5/2 Conversion of Large Properties 	<ul style="list-style-type: none"> Option 118: Opportunities for providing new housing 	<ul style="list-style-type: none"> Not applicable

Key issues raised during Issues and Options (2012) and Issues and Options 2 (2013) consultations:

SECTION OF THE ISSUES AND OPTIONS REPORT (2012)	KEY ISSUES ARISING FROM CONSULTATION
<p>Option 118: Opportunities for providing new housing</p>	<ul style="list-style-type: none"> This option was supported by all respondents to this issue. Concern was raised that it should be designed to avoid short-term thinking and to ensure that opportunistic development does not result in a skewing of the overall housing mix in a given area; Emphasis should be less on the need to create new units of accommodation and more on the need to retain the existing variety of stock suitable for different household sizes; There should always be the presumption particularly for buildings of historic interest and in conservation areas that any conversion returns the house or building to its original use; Identify empty houses to be repaired and brought back into use (perhaps using council loans to be paid back once a house is let or sold); Identify derelict sites on residential streets, which could be used for small amounts of housing (e.g. the old tapes shop on Gwydir Street); <p>Older buildings and those not in use should be renovated to address housing needs before there are schemes for large scale housing developments that lack community infrastructure.</p>
<p>NEW OPTIONS ARISING FOLLOWING COMMUNITY INVOLVEMENT:</p>	
<p>No additional options have been suggested.</p>	

Evidence base:

- National Planning Policy Framework (2012);
- The Cambridge Sub-region Strategic Housing Market Assessment (2008 and updates);
- Cambridge City Council (2012) Housing Strategy 2012 – 2015.

How the policy came about:

201. Given the need for housing in Cambridge, it will be important for the Local Plan to ensure that opportunities to provide new housing are explored. Whilst the sub-division of large properties into additional dwellings makes a useful contribution towards the overall housing need in the city, it can lead to the loss of family accommodation and in some cases, a loss of historic character. There is a need to ensure that any proposals would result in a satisfactory living environment, without overcrowding, and that the quality of Cambridge's historic environment is preserved and enhanced. Whilst it is important to retain existing housing wherever possible, this needs to be balanced against other objectives and priorities, including the need for different sizes of dwelling unit and the National Planning Policy Framework's requirements for flexibility and responsiveness to changing economic circumstances. In some cases, it will be appropriate to replace poorly designed housing or housing that is no longer cost-effective to repair and maintain with housing that meets modern standards of design, layout and energy efficiency.
202. The current Local Plan includes policies relating to the conversion of large properties (5/2). In accordance with national guidance, it is considered reasonable to continue with this approach on the basis that it is the most appropriate way of ensuring that opportunities to provide new housing are explored and suitable living environments are achieved. This approach has been supported by respondents to the Issues and Options consultation on Option 118. There was some concern, however, about the need to retain a variety of housing stock to meet different households' needs.
203. Pursuing this option would allow for the development of a policy which would address the conversion of large properties. This approach is consistent with national guidance and helps to maximise opportunities to increase housing supply in Cambridge to meet need. However, a balanced approach must be taken and consideration given to the needs of surrounding occupiers and the character of the area as a whole. In relation to the conversion of large properties to a greater number of smaller units, a criteria based approach should set out the need for the development to have a satisfactory standard of amenity for its occupiers and neighbouring properties; consideration of the impact on on-street parking and the character of the area; and refuse and cycle storage.

204. In the past, an existing floorspace of 110m² was utilized in the Cambridge Local Plan 2006 as a standard when assessing whether a property is suitable for conversion. The standards cited within the Council’s internal residential space standards are considered robust and will be applied to flat conversion applications, acting as one of the determinants of quality conversion schemes, but it is also considered appropriate to set out a new minimum existing floorspace for conversion of 120m², which reflects the need for bigger unit sizes to meet the residential space standards.

Findings of the Sustainability Appraisal of the Cambridge Local Plan (July 2013)

205. The findings of the Sustainability Appraisal of the draft Cambridge Local Plan were that this policy will allow flat conversions only where there will be a good standard of amenity for its occupiers and negative impacts on neighbouring properties are avoided, likely resulting in positive effects.

Key Issues raised during Proposed Submission consultation

Policy 53: Flat Conversions	
Total Representations: 8	
Object: 7	Support: 1
Objections	<ul style="list-style-type: none"> • The policy should protect large family homes from conversion into flats, particularly in the Mill Road area and the Glisson Road and Newtown conservation areas; • The policy should take into account the effect of conversions on the local mix of residential types and family homes; • The policy should contain specific limits for conversions tailored to each area of the city blighted by the current rush of conversions and homes in multiple occupation; • Criterion (c) of the policy refers to “negative impact”, which is not defined; • Criterion (c) of the policy should be amended to read “ the proposal, in terms of the number of units and scale of associated extensions, would not have a negative impact on the amenity or character of the area or on highway safety in streets already experiencing parking stress, or a cumulative impact on the local mix of residential unit sizes”; • Add to text to paragraph 6.41 to read “That access and accommodation for disabled people is not reduced or worsened”; • The requirement for parking surveys is unjustified in the case of small scale developments and should be deleted from paragraph 6.43.
Support	<ul style="list-style-type: none"> • It is vital that the cumulative impact is taken into account as the

	current policy is too lax.
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Minor Modifications suggested following Proposed Submission consultation and implications for Sustainability Appraisal

206. No changes to Policy 53: Flat Conversions or the supporting text are suggested in the Addendum to the Cambridge Local Plan 2014: Proposed Submission document. There are therefore no impacts on the findings of the Sustainability Appraisal.

Policy 54: Residential Moorings

EXISTING POLICY TO BE REPLACED (CAMBRIDGE LOCAL PLAN 2006)	OPTION(S) BEING TAKEN FORWARD FROM THE ISSUES AND OPTIONS REPORT (2012) AND ISSUES AND OPTIONS 2 (2013)	OPTION(S) NOT BEING TAKEN FORWARD FROM THE ISSUES AND OPTIONS REPORT (2012)
<ul style="list-style-type: none"> Part of Policy 3/9 Watercourses and Other Bodies of Water 	<ul style="list-style-type: none"> Option 120: Residential Moorings Site Number RM1 – Fen Road 	<ul style="list-style-type: none"> Not applicable

Key issues raised during Issues and Options (2012) and Issues and Options 2 (2013) consultations:

SECTION OF THE ISSUES AND OPTIONS REPORT (2012)	KEY ISSUES ARISING FROM CONSULTATION
Option 120: Residential moorings	<ul style="list-style-type: none"> The majority of respondents supported the need to identify areas for new moorings, despite having concerns about the reality of their development and potential for knock-on impacts in a given area. Reference was made to marina provision. Concern was raised that moorings should be provided within the city boundary with standards enforced, equivalent to those which would be required of land dwellings. For example, coal and diesel should not be burned emitting fumes at one to two metre height. Many respondents supported the need for residential moorings; New residential moorings should not be at the expense of short-stay tourist moorings; New residential moorings should not be to the detriment of the riverscape;

SECTION OF THE ISSUES AND OPTIONS REPORT (2012)	KEY ISSUES ARISING FROM CONSULTATION
	<ul style="list-style-type: none"> • Need to consider impact on parking in a locality; • Need to consider amenity of local residents; • Risk of air and water pollution. <p>Sites identified for residential moorings during consultation:</p> <ul style="list-style-type: none"> • Fen Ditton; • Land to the west of the River Cam off Fen Road; • Land to the south-east of Clayhithe Bridge, Waterbeach; • North side of the River Cam, near Fen Road; • Further mooring on the south side of the river on Stourbridge Common.
NEW OPTIONS ARISING FOLLOWING COMMUNITY INVOLVEMENT:	
Respondents raised the need for site allocations to be made for residential moorings provision.	

Key issues raised to the Issues and Options 2, Part 2 document (Site RM1 – Fen Road)

	KEY ISSUES ARISING FROM CONSULTATION
Objections	<ul style="list-style-type: none"> • Should remain as green space • Better sited further north adjacent to A14 • Wrong to relocate problems off to the edge of the City – illegal mooring should be tackled by other means • Site may not be big enough to allow boats to turn within it • No mains sewerage connection • Site means emerging boats would block rowing and racing • Access problems by land and water formidable • Problems of access along Fen Road
Support	<ul style="list-style-type: none"> • Location reasonable with good connections • Provided Riverside mooring are vacated
Comment	<ul style="list-style-type: none"> • Should be coordinated with CF1 site proposals for mooring by South Cambs • Consider as part of master plan for Northern Fringe East • Consider as part of strategy for River Cam corridor • How would these affect Haling Way and what access would be provided? • Will this affect uncontrolled moorings on the main river? • Combine with opportunities to improve walking and cycling • Designate White House as heritage asset

	<ul style="list-style-type: none"> • No increase in navigational charges
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Evidence base:

- British Waterways (2011). Guidance for Development of new Residential Mooring Sites (England and Wales);
- Cambridge City Council (2006). River Mooring Policy;
- Cambridge City Council(Undated) Boat Mooring Map, available at <https://www.cambridge.gov.uk/boat-mooring-map> ;
- Cambridge City Council, Report to Community Services Scrutiny Committee 12/01/2011 on Riverside – Riparian Ownership and Mooring;
- Cambridge City Council, Report to Community Development and Leisure Scrutiny Committee 24/03/2005 on River Moorings;
- Cambridge City Council, Report to Community Services Scrutiny Committee 18/01/2007 on Review of Moorings Policy.

How the policy came about:

207. The National Planning Policy Framework sets out the requirement in paragraph 50 to deliver a wide choice of quality homes and to create sustainable, inclusive and mixed communities. Whilst representing a very small percentage of housing provision within Cambridge and only being suitable for the needs and housing expectations of a small sector of the population, residential moorings contribute both to the diversity of the city and to the supply of different forms of housing.
208. The Interim Sustainability Appraisal of the Issues and Options report identified that residential moorings have the potential to make a limited contribution to increased housing supply, and when coupled with this option to ensure adequate services, access, and the protection of amenity, should contribute positively to communities and well-being. Criteria to ensure that the ecological value of waterways is maintained should positively influence biodiversity and protect water quality. Flood risk management of moorings will bring benefits, potentially helping to address flood risk issues in North and South Cambridge.
209. The Conservators of the River Cam are the statutory navigation authority, responsible for the maintenance of navigation of the River Cam from the Mill Pond, Silver Street to Bottisham Lock. Working with the Conservators and other stakeholders, the council is responsible for the management of residential and visitor moorings on the River Cam and has set out its approach to this issue through the development of a moorings management policy. The existing moorings policy was initially approved by the Executive Councillor for Community Development and Leisure in March 2005 and was subsequently reviewed in 2006/2007. Within this Moorings Policy, the council sets fees for residential and visitor mooring licences. The licensing process sets out the council's expectations in terms of standards of riverworthiness, behaviour and

occupancy. This is linked with the Conservators of the River Cam's navigation licensing process.

210. There is currently calculated to be space on the River Cam within the city for some 70 licensed boats to be moored with sufficient space between moored vessels. This is based on the capacity of the river having been calculated on the amount of available riverbank divided by the average length of a vessel (70ft or 21.34 metres) and an assessment made of the space needed by other river users to access the river. The overall figure of 70 boats includes allowance for 15 wide-beam boats of 2.15 metres or more. Only limited areas of the River Cam are suitable for the mooring of boats of this size.
211. Over the course of the last two decades, the city has seen a gradual increase in the number of boatowners wishing to live permanently on the River Cam and the number of visitors spending time on the city's waterways. A change in mooring management policy in the 1990s gave rise to additional opportunities for residential mooring at Midsummer Common, Stourbridge Common and Jesus Green. Current mooring sites are shown on the council's Boat Mooring Map (available via Google on the Council's website).
212. Existing areas for permanent residential moorings include Area B where mooring is permitted for 75 metres on Jubilee Gardens upstream of the weir; Area D2 adjacent to Jesus Green, Areas E1, G and H adjacent to Midsummer Common; and Areas K2 and M adjacent to Stourbridge Common.
213. Visitors wishing to moor a boat in Cambridge are subject to a maximum 48-hour stay, and are not permitted to return within seven days of leaving. Areas for visitor moorings are marked with green markers and lines on the Council's Boat Mooring Map. These areas include Area C adjacent to Chesterton Road and Area E2 adjacent to Midsummer Common, outside the Fort St George public house.
214. Areas for temporary mooring are marked with yellow markers and lines on the Council's Boat Mooring Map. These areas include Area D1 where temporary mooring is permitted for up to two hours from 10am to 4pm upstream of the pump out, and Area K1 where temporary mooring is permitted for up to two hours from 8am to 6pm upstream of the pump out.
215. Areas where no mooring is permitted are marked with red markers and lines on the Council's Boat Mooring Map. These areas include Area A, where no mooring is permitted upstream of the lock and includes 36 metres downstream of the lock. Visiting punts can stay for up to one hour. In Areas F, J, L and N, no mooring is permitted at all.
216. Within the Cambridge Local Plan 2006, the Council set out Policy 3/9 on Watercourses and Other Bodies of Water. This policy addressed the need for further moorings obliquely, but mention of the allocation of Site 3.01 off Fen

Road for off-river moorings was made in the supporting text (paragraph 3.28). Site 3.01 has not yet come forward for development. The Council's Issues and Options report (2012) set out a proposal for a criteria-based policy for assessing proposals for new residential moorings. In addition to the inclusion of Option 120 in the Issues and Options report, the Council also asked whether there were any suitable sites for the provision of further residential moorings within the city.

217. New residential moorings require planning permission and need access to adequate services including water supply, electricity, and disposal facilities for sewage and rubbish. Access is also required for emergency vehicles. New moorings should not have a negative impact on the amenity, conservation and ecological value of the river. Mooring facilities are defined as either on-line or off-line. On-line moorings are often merely linear moorings along the riverbank itself, whilst off-line moorings involve boats navigating into a separate engineered basin or larger marina separate from the river.
218. The majority of respondents supported the need to have a policy on provision of residential moorings and identify areas for new moorings, despite having concerns about the reality of their development and potential for knock-on impacts in a given area. Reference was made to off-line moorings in the form of marina provision. Concern was raised that any mooring provided within the city boundary with should have standards enforced, equivalent to those which would be required of land dwellings. For example, coal and diesel should not be burned emitting fumes at one to two metres in height.
219. Whilst there is demand for new residential and visitor moorings within Cambridge, it is recognised that there is limited suitable space available in the city. In addition to the need to continue to balance the needs of the long-term residential moorings against those of the short-term visitor moorings, which can support tourism in Cambridge, there is a balance to be struck between maintaining and increasing the number of areas available for residential and visitor moorings and the needs of other users of the river, including commercial operators, anglers, rowers and rowing clubs and other local residents. Notwithstanding the needs of other users of the river, other key issues for the provision of new residential moorings include the need to consider the potential impact on the river itself and the surrounding landscape/townscape; parking levels in the surrounding area; the amenity of other local residents. A River Cam capacity study is being developed, which is likely to make reference to these issues. It is considered that the development of a criteria-based policy for residential moorings would address the potential to deliver further moorings whilst recognising the need to maintain the quality of the riparian environment and safeguard local amenity. Such a criteria based approach would include reference to the following issues:

- Integration with the local landscape/townscape;

- Provision of appropriate servicing, e.g. water supply and disposal of sewage and refuse;
 - Provision of appropriate pedestrian and vehicular access;
 - Protection of the surrounding natural and historic environment;
 - Proximity to existing services and amenities;
 - Safeguarding of local amenity with no adverse effect on neighbouring properties;
 - Protection of pedestrian and cycle routes and ongoing navigation of the River Cam.
220. Many of the sites identified for residential moorings during consultation are not situated within Cambridge's administrative boundary. As such, these sites cannot be allocated for residential moorings provision by Cambridge City Council. Sites put forward in South Cambridgeshire include:
- Fen Ditton;
 - Land to the west of the River Cam off Fen Road;
 - Land to the south-east of Clayhithe Bridge, Waterbeach.
221. Within Cambridge's administrative boundary, two sites were put forward for further consideration:
- North side of the River Cam, near Fen Road;
 - Further mooring on the south side of the river on Stourbridge Common.
222. A site of 0.98 hectares on the northern bank of the River Cam, lying south-east of Fen Road, was allocated in the Cambridge Local Plan 2006 for off-river moorings. This site is owned by the Conservators of the River Cam and has not come forward for development since 2006. This site has been consulted on as part of the Issues and Options 2 consultation (Site reference RM1 – Fen Road) for allocation as off-river moorings and lies directly adjacent to Option CF1 – Residential Mooring at Fen Road in South Cambridgeshire's Issues and Options 2, Part 2 consultation.
223. The provision of further moorings on the southern side of the River Cam at Stourbridge Common was also considered in drawing up sites for consultation as a part of Issues and Options 2 consultation. Officers responsible for managing moorings within the city confirmed that all possible mooring areas are already in use in this location. Further moorings may impact negatively upon the navigation of the river and its heavy recreational use. Consultation on the management of moorings on nearby Riverside has recently taken place, the results of which may impact on the number of moorings available within the city.
224. At Development Plan Scrutiny Sub-Committee in February 2013, it was agreed that the council would pursue a criteria-based policy for residential moorings,

which would include criteria suitable for development management use for both on-line and off-line moorings.

Findings of the Sustainability Appraisal of the Cambridge Local Plan (July 2013)

225. The findings of the Sustainability Appraisal of the draft Cambridge Local Plan were that protection for the water environment is also supported by Policy 54, which seeks to ensure that residential moorings have no significant negative effect on the ecological value of the River Cam. In terms of community and wellbeing, this policy states that residential moorings will be permitted where close to existing services and amenities and where there is no significant negative effect on local amenity, therefore likely leading to positive effects.

Key Issues raised during Proposed Submission consultation

Policy 54: Residential Moorings	
Total Representations: 7	
Object: 5	Support: 2
Objections	<ul style="list-style-type: none"> • New residential moorings on the river should not be permitted – increasing online mooring is contrary to the national policy of the Canals and Rivers Trust; • Current residential boats should be removed when vacated by current occupants; • New moorings should only be permitted where there are mains services available for all boats; • Houseboats should not contribute to meeting housing need, as their accommodation is often sub-standard; • Residential mooring should be part of a wider mooring strategy integrated with the River Cam strategy, which looks at the wider needs of the city, residents, general public and other river users; • The policy does not address health, safety or disabled access issues; • Lack of evidence base for quantitative need for moorings – need for an existing condition survey and study to inform policy clearly; • Site RM1 Fen Road is not in a sustainable location and will not be used fully due to its location; • Site RM1 Fen Road should be developed as housing; • Change the policy title to 'Residential and Visitor Moorings' and remove from housing section to sit with River Cam or Public Open Spaces strategy; • Create new policy with three elements: <ul style="list-style-type: none"> a) Proposals for new residential moorings alongside the towpath will not generally be permitted. The council seeks to gradually reduce online mooring and restore public access to enhance

	<p>the intrinsic value and public amenity benefits of the river and bank for all users. Where retained, online residential moorings must be limited in number to ensure sufficient 'breathing space' between groups of moored boats;</p> <p>b) Proposals for new offline marinas will be considered favourably if they meet the following conditions (a-g as per draft policy);</p> <p>c) The city recognises the importance to the local economy of providing high quality, well located moorings for visiting boats and will balance the needs of residential moorers and those of visiting boats to ensure a sufficient number of visitor moorings;</p> <ul style="list-style-type: none"> • The policy should have a new opening sentence to read "There is a presumption against long-term mooring on the river itself to preserve it an amenity and its value for navigation. Existing vessels used for residential purposes on the river will be allowed to continue to moor but must be removed on vacation by the current occupants and that part of the riverbank must not be reoccupied"; • In the present policy wording the first sentence should be amended by inserting after "moorings" in the first line "off the river navigation" then as now until (g) where "the footpath" should read "any footpath"; • An additional criterion (h) should be added "That the towpath is accessible, see guidance by British Waterways for disabled access"; • An additional criterion (h) should be added "allows adequate access to the river from the bank in common areas"; • An additional criterion (i) should be added "provides for adequate mooring for boats visiting Cambridge"; • An additional criterion (j) should be added "seeks to reduce linear mooring and encourages and promotes offline mooring"; • An extension of residential moorings in Cambridge (implied by paragraph 6.47) has not been a matter of specific consultation; • Add a paragraph in the supporting text to the effect that visiting boats have less detrimental impact on air quality or noise levels since fully charged batteries reduce the need to run noisy, antisocial generators for long periods or to burn solid fuels, and should therefore be the only moorings permitted in close proximity to residential dwellings. This is the case with many other mooring authorities, e.g. Ely and Islington.
Support	<ul style="list-style-type: none"> • South Cambridgeshire District Council supports the allocation of residential moorings, forming part of a larger site with an area of land proposed to be allocated in South Cambridgeshire.

Minor Modifications suggested following Proposed Submission consultation and implications for Sustainability Appraisal

226. As a result of a representation (Representation Number 27408) made during the Proposed Submission consultation, a minor modification to criterion (g) of Policy 54: Residential Moorings is suggested for clarity. This change is in the Addendum to the Cambridge Local Plan 2014: Proposed Submission document marked as PM/6/010. PM/6/010 suggests that criterion (g) is amended to read “does not impede navigation and/or use of ~~the~~ any footpath.”
227. Following consideration of the impact of this change on the Sustainability Appraisal Framework, it has been concluded that this change does not materially alter the findings of the Sustainability Appraisal.

AUDIT TRAIL: SECTION 7: PROTECTING AND ENHANCING THE CHARACTER OF CAMBRIDGE

Policy 55: Responding to Context

EXISTING POLICY TO BE REPLACED (CAMBRIDGE LOCAL PLAN 2006)	OPTION(S) BEING TAKEN FORWARD FROM THE ISSUES AND OPTIONS REPORT (2012) AND ISSUES AND OPTIONS 2 (2013)	OPTION(S) NOT BEING TAKEN FORWARD FROM THE ISSUES AND OPTIONS REPORT (2012)
<ul style="list-style-type: none"> 3/4 Responding to Context 	<ul style="list-style-type: none"> Option 61 Criteria based approach to responding to context 	<ul style="list-style-type: none"> Not applicable

Key issues raised during Issues and Options (2012) and Issues and Options 2 (2013) consultations:

SECTION OF THE ISSUES AND OPTIONS REPORT	KEY ISSUES ARISING FROM CONSULTATION
<p>Option 61: Criteria based responding to context</p> <p>This option sets out the importance of all new developments responding to local character and distinctiveness, reflecting the identity of local surroundings, while not stifling innovation.</p>	<ul style="list-style-type: none"> Generally supportive of the policy; Scale is critical; Some of the terminology needs to be altered to make The policy doesn't give enough scope for innovative development; Ensure internal space requirements are adequate. English Heritage requests specific reference to make it clear that applicants should set out clearly in their Design and Access Statement their examination of context
<p>NEW OPTIONS ARISING FOLLOWING COMMUNITY INVOLVEMENT</p> <p>No additional options have been suggested.</p>	

Evidence base:

- Urban Design Compendium (Volumes 1 and 2);
- Cambridgeshire Quality Charter for Growth (2008);
- Cambridge City Council (2003) Cambridge Landscape Character Assessment (2003);

- Cambridge City Council Conservation Area Appraisals (various dates);
- Cambridge City Council (2006) Historic Core Area Appraisal;
- Cambridge City Council Suburbs and Approaches Studies (various dates);
- Cambridge City Council urban design briefs for specific locations (see the [Urban Design](#) guidance pages of our website).

How the policy came about:

1. New development should be of a high quality of design in order to create places that are enduring, robust and complement and enhance the existing character of Cambridge. An essential part of achieving this aim is to ensure that the context of any proposal is considered as part of the design process.
2. The National Planning Policy Framework is supportive of a “context-led” approach, noting that local plans should ensure that developments “respond to local character and history, and reflect the identity of local surroundings and materials, while not preventing or discouraging appropriate innovation” (paragraph 58). It also notes that it is proper for planning policies to seek to promote or reinforce local distinctiveness. Current Local Plan (2006) Policy 3/4 (Responding to Context) has worked effectively to date in ensuring a context-led approach to design is achieved across the city; new Policy 55 is intended to follow the same context-led approach. As part of the Issues and Options consultation stage in 2012, only Option 61 was put forward (Criteria Based Responding to Context) given the clear steer provided by the National Planning Policy Framework and the obvious importance of context in an historic and growing city such as Cambridge.
3. An understanding of, and response to, context is crucial to creating high quality development; analysis of context is a key part of the design process. To proceed with a scheme ahead of a thorough analysis and understanding of the area around it has the potential to create poorly integrated developments and undermine the quality of the built and natural environment of Cambridge. The best developments usually take the best of local elements and design approaches and integrate them into the design. The Stirling Prize winning Accordia scheme in Cambridge, for example, employs a buff brick, which is typical to Cambridge; it is also predominantly low-rise, which is equally the predominant form in this context. A policy requiring that development proposals understand the surrounding context ensures that sensitive and high quality schemes come forward, helping to establish a benchmark to inform well designed schemes, while not stifling innovation or imposing architectural styles.
4. Context should not limit creativity, but instead be used to inform the design process and accordingly developers should be prepared to justify their scheme as a response to the particular surrounding context. A development that responds positively to its context is one that will either enhance areas of existing high quality, or will seek to introduce a new and distinctive character

to areas of weaker character. What should be clear, and contained within the submitted Design and Access Statement, is the clear rationale for the end development proposal. Government guidance on the preparation of Design and Access Statements makes it explicit that assessment of the context is an essential part of such statements. Such statements are required for all major development and Government guidance is clear that an examination of context must be undertaken.

Findings of the Sustainability Appraisal of the Cambridge Local Plan (July 2013)

5. The findings of the Sustainability Appraisal of the draft Cambridge Local Plan, were that overall the plan would lead to significant positive effects in terms of the following SA objectives:
 - be of the highest quality, in terms of design excellence and innovation, addressing its impact upon its surroundings and embracing the principles of sustainable design and construction.
 - contribute to the positive management of change in the historic environment, protecting, enhancing and maintaining the unique qualities and character of Cambridge, including the River Cam corridor, the city's wider landscape and setting, and its designated and undesignated heritage assets for the future.
 - protect and enhance the landscape setting of the city, which comprises the Cambridge Green Belt, the green corridors penetrating the urban area, the established network of multi-functional green spaces, and tree canopy cover in the city.
 - protect and enhance the city's biodiversity, network of habitats and geo-diversity.
 - promote social cohesion and sustainability and a high quality of life by maintaining and enhancing provision for open space, sports and recreation, community and leisure facilities, including arts and cultural venues that serve Cambridge and the sub-region.
 - ensure appropriate and timely provision of environmentally sustainable forms of infrastructure to support the demands of the city, including digital and cultural infrastructure.
 - promote a safe and healthy environment, minimising the impacts of development and ensuring quality of life and place.

6. The appraisal noted that all of the policies in Section 7 (Policies 55 – 71) seek to ensure that the character of Cambridge is protected and enhanced. In particular, Policy 55 (Responding to Context) requires proposals to “identify and respond positively to existing features of natural, historic or local importance on and close to proposed development sites”, as well as “use appropriate local characteristics to help inform the use, siting, massing, scale, form, materials and landscape design”. In doing so this policy should ensure that the character and distinctiveness of Cambridge's Conservation Areas is

both protected and enhanced and in doing so should positively contribute to the sustainability objective.

7. The appraisal noted that Policy 55 has the potential to minimising negative effects for biodiversity. Furthermore, the historic assets of the city centre are likely to be further protected through the provisions of Policy 55. This policy states that development will be supported where it is demonstrated that it responds positively to its context, including features of natural, historic or local importance.
8. The appraisal noted that the combination of 55, 56 and 59 should also ensure that development proposals lead to significant positive effects in terms of encouraging proposals that lead to high quality design and an improved public realm.

Key Issues raised during Proposed Submission consultation

Policy 55: Responding to context	
Total Representations: 8	
Object: 5	Support: 3
Objections	<ul style="list-style-type: none"> • The council needs to show a determination for quality and the need to enforce the policies and any obligations imposed on developers; • Policy wording is weak and gives little protection to conservation areas and heritage assets; • New large developments can act as a dangerous precedent for newer larger developments; • With regard to the importance of the interface between the urban edge and the countryside, various studies should be referred to in order to support the policy.
Support	<ul style="list-style-type: none"> • Support for the policy reflecting the requirements of the NPPF with regard to design.

Minor Modifications suggested following Proposed Submission consultation and implications for Sustainability Appraisal

9. No changes to Policy 55 Responding to Context or the supporting text are suggested in the Addendum to the Cambridge Local Plan 2014: Proposed Submission document. There are therefore no impacts on the findings of the Sustainability Appraisal.

Policy 56: Creating Successful Places

EXISTING POLICY TO BE REPLACED (CAMBRIDGE LOCAL PLAN 2006)	OPTION(S) BEING TAKEN FORWARD FROM THE ISSUES AND OPTIONS REPORT (2012) AND ISSUES AND OPTIONS 2 (2013)	OPTION(S) NOT BEING TAKEN FORWARD FROM THE ISSUES AND OPTIONS REPORT (2012)
<ul style="list-style-type: none"> 3/7 Creating Successful Places 	<ul style="list-style-type: none"> Option 62 Criteria based policy for delivering high quality places 	<ul style="list-style-type: none"> Not applicable

Key issues raised during Issues and Options (2012) and Issues and Options 2 (2013) consultations:

SECTION OF THE ISSUES AND OPTIONS REPORT (2012)	KEY ISSUES ARISING FROM CONSULTATION
<p>Option 62: Criteria based policy for delivering high quality places</p> <p>The aim of this option is to provide the more detailed requirements for the design and planning of new development</p>	<ul style="list-style-type: none"> Needs to be made clear at what scale of development these policies are aimed at – criteria not relevant to all schemes; Cambridge should develop a ‘local identity’ in design; ‘Safe’ walking and cycling routes with priority for the pedestrian over the car should be added to the criteria; No need for a local plan policy addressing this issue, as it is a matter best dealt with through Supplementary Planning Documents; Only include public art as an integral part of major new developments;
NEW OPTIONS ARISING FOLLOWING COMMUNITY INVOLVEMENT	
No additional options have been suggested	

Evidence base:

- Urban Design Compendium (Volumes 1 and 2);
- Cambridgeshire Quality Charter for Growth (2008);
- Cambridge City Council (2007). Sustainable Design and Construction Supplementary Planning Document;
- Cambridge City Council, Public Art Supplementary Planning Document (2010);
- Cambridgeshire County Council (2007) Cambridgeshire Design Guide for Streets and the Public Realm.

How the policy came about:

10. The National Planning Policy Framework states that “local and neighbourhood plans should develop robust and comprehensive policies that set out the quality of development that will be expected for the area (Paragraph 58).” It is considered that a robust and comprehensive policy setting out the quality of development that will be expected for an area is consistent with requiring good design. Such a policy provides certainty for developers as to the aspects that would need to be demonstrated in development proposals for them to be considered acceptable. Successful places are the product of many different factors and influences. The National Planning Policy Framework recognises that high quality design contributes positively to the creation of places that improve the quality of people’s lives and experiences. Criteria based policy promoting successful place making is therefore consistent with national planning policy requirements.
11. Current Policy 3/7 (Creating Successful Places) provides a comprehensive set of criteria which, depending on the scale and type of development, can be used to both develop and evaluate design solutions. This approach finds its origins in “By Design - Urban Design in the Planning System: towards better practice” (2000) which, along with all relevant planning guidance, will be relevant in the preparation of new national level guidance by Government following the findings of the recent Taylor Review. Policy 56 takes a similar approach in that it sets out criteria-based requirements for new design. No other options for the design of new places were put forward at the Issues and Options consultation stage in 2012 other than Option 62: Criteria based policy for delivering high quality places.
12. Place making is an essential component of high quality development and when done well, will either create somewhere with a distinct identity, or will reinforce the identity of an existing place. It is considered that ‘place making’, that is the interaction of a building with the public realm or streets and open space, can be achieved at all scales of development. In the case of an individual dwelling, it can be as simple as ensuring that there is good surveillance of the street from a habitable room or making sure that there is a clear distinction between public and private space. At a more strategic level, place making involves understanding how the layers of movement and access, land use, density and open space all interact to achieve a framework for a place that functions well and can adapt over time. The level of ‘detail’ or ‘focus’ changes depending upon the scale of development, with the ‘resolution’ of elements varying dependent upon the complexity and scale of the site.

Findings of the Sustainability Appraisal of the Cambridge Local Plan (July 2013)

13. The findings of the Sustainability Appraisal of the draft Cambridge Local Plan were that overall the plan would lead to significant positive effects in terms of the following SA objectives:
 - protect and enhance the landscape setting of the city, which comprises the Cambridge Green Belt, the green corridors penetrating the urban area, the established network of multi-functional green spaces, and tree canopy cover in the city.
 - promote social cohesion and sustainability and a high quality of life by maintaining and enhancing provision for open space, sports and recreation, community and leisure facilities, including arts and cultural venues that serve Cambridge and the sub-region.
 - promote a safe and healthy environment, minimising the impacts of development and ensuring quality of life and place.

14. The appraisal noted that Policy 56’s focus on new developments meeting the principles of inclusive design, in particular for those with disabilities, the elderly and those with young children is likely to result in positive effects. The combination of Policy 56 and 57 should help ensure that Cambridge’s historic environment is protected and enhanced. The combination of 55, 56 and 59 should also ensure that development proposals lead to significant positive effects in terms of encouraging proposals that lead to high quality design and an improved public realm.

15. The appraisal concluded that the policy could be reworded to emphasise the need for proposals to be accessible by sustainable modes of transport such as through the inclusion of foot / cycle paths and public transport. This recommendation was implemented in Policy 80, Supporting Sustainable Access to Development which prioritises access by sustainable modes of travel.

Key Issues raised during Proposed Submission consultation

Policy 56: Creating successful places	
Total Representations: 18	
Object: 16	Support: 2
Objections	<ul style="list-style-type: none"> • The Council needs to show a determination for quality and the need to enforce the policies and any obligations imposed on developers; • Criterion a needs to ensure a coordinated and integrated approach which recognises local residents’ needs – city planning should not be addressed in isolation from transport planning; • Criterion (b) - The phrase "not allowing vehicular traffic to dominate" is insufficient. Cambridge will only cope with large

	<p>housing growth if high levels of cycling are actively catered for;</p> <ul style="list-style-type: none"> • Criteria (h) and (k) should be amended to meet the needs of disabled people; • Criterion (j) has an obligation to ‘public art’ which may lead to lumps of materials that do not enhance the environment – should be an addition rather than necessity; • Criterion (j) - What is most often missing is real craftsmanship, as in many cases fine craftsmanship can be more appropriate than a piece of art; • Criterion (j) and paragraph 7.9 - Public art provision should be dependent on scheme viability, with scope for flexibility in instances where this is marginal so as not to harm the delivery of much needed housing; • The policy should apply to both major and minor development and conservation areas; • The policy should cross reference other council policies (e.g. on tall buildings) to add a level of objectivity; • The policy does not provide sufficient guidance given that other parts of the plan (Policy 60 and Appendix F) suggest tall buildings/landmark buildings may be acceptable; • Policy needs to be more specific about density requirements; • Higher densities are more appropriate for urban living; • Many new developments are insensitive in scale in comparison to the existing historic, built environment; • The quality of architecture in many recent buildings is poor.
Support	<ul style="list-style-type: none"> • Support in principle.

Minor Modifications suggested following Proposed Submission consultation and implications for Sustainability Appraisal

16. As a result of assessment, one minor modification is suggested for Policy 56 Creating successful places, criterion k. This change is in the Addendum to the Cambridge Local Plan 2014: Proposed Submission document marked as PM/7/001.

17. This proposed minor modification is suggested in response to representation number 28365 and seeks to apply the appropriate terminology as follows:

“k. ensure that proposals meet the principles of inclusive design, and in particular meet the needs of ~~people with disabilities~~ disabled people, the elderly and those with young children.”

18. Following consideration of the impact of these changes on the Sustainability Appraisal Framework, it has been concluded that these changes to not materially alter the findings of the Sustainability Appraisal.

Policy 57: Designing New Buildings

EXISTING POLICY TO BE REPLACED (CAMBRIDGE LOCAL PLAN 2006)	OPTION(S) BEING TAKEN FORWARD FROM THE ISSUES AND OPTIONS REPORT (2012) AND ISSUES AND OPTIONS 2 (2013)	OPTION(S) NOT BEING TAKEN FORWARD FROM THE ISSUES AND OPTIONS REPORT (2012)
<ul style="list-style-type: none"> 3/12 The Design of New Buildings 	<ul style="list-style-type: none"> Option 63 Criteria based policy for the design of buildings 	<ul style="list-style-type: none"> Not applicable

Key issues raised during Issues and Options (2012) and Issues and Options 2 (2013) consultations:

OPTION NUMBER/OTHER	KEY ISSUES ARISING FROM CONSULTATION
<p>Option 63: Criteria based policy for the design of buildings</p> <p>The aim of this option is to ensure that new buildings are designed to a high standard and meet key requirements in respect of form and function</p>	<ul style="list-style-type: none"> Why is refurbishment covered here? Surely this should be covered in Option 66; Matter could be dealt with by a Supplementary Planning Document; Doesn't meet paragraph 58 in the National Planning Policy Framework. Many recent buildings not reached 'high quality' of design; Contemporary and 'historical' designs can both be suitable for a new or old site if design is good.
NEW OPTIONS ARISING FOLLOWING COMMUNITY INVOLVEMENT	
No additional options have been suggested.	

Evidence base:

- Urban Design Compendium (Volumes 1 and 2);
- Cambridgeshire Quality Charter for Growth (2008);
- Cambridge City Council (2007). Sustainable Design and Construction Supplementary Planning Document;
- Cambridgeshire County Council (2007) Cambridgeshire Design Guide for Streets and the Public Realm;
- Cambridge City Council (2010) Cycle Parking Guide for new residential developments;

- Cambridgeshire County Council (2012) RECAP Waste Management Design Guide Supplementary Planning Document.

How the policy came about:

19. The thrust of this policy is about the design of new buildings and ensuring they are designed and delivered to a high quality. Paragraph 58 of the National Planning Policy Framework states 'Local and neighbourhood plans should develop robust and comprehensive policies that set out the quality of development that will be expected for the area.' Policy 57 seeks to provide just such a policy.
20. At the Issues and Options stage of the plan preparation, it was suggested that there was no need for a policy to cover design and that a Supplementary Planning Document would be more appropriate. Whilst the National Planning Policy Framework, at Paragraph 60, states that "Planning policies and decisions should not attempt to impose architectural styles or particular tastes and they should not stifle innovation, originality or initiative", the development of robust and comprehensive policies that set out the quality of development that will be expected for an area is entirely consistent with requiring good design.
21. Cambridge has a strong track record of delivering high quality design with recent examples of such recognition including the two Stirling Prize winning schemes at Accordia and the Sainsbury Laboratory respectively. Additionally, the first Phase of Clay Farm (Great Kneighton) recently won a Government Housing Design Award 2012 (Project Winner). These projects have set a high benchmark for other schemes to follow. A future policy which sets out clearly what is expected in terms of building design is important to ensure future development also reaches these high standards. It is worth noting that both 'contemporary' and 'historical' design can be suitable.
22. The approach to the design of new buildings needs to be driven by a thorough understanding of context, use and functional requirements. Regardless of whether a scheme is traditional or contemporary in approach, the key to achieving high quality is good design and execution. Good design incorporates tried and tested methods of elements such as employing robust materials, clear building entrances, good detailing, and clear "fronts" and "backs" amongst other devices. Planning policy should articulate these elements in a sufficient level of clarity and detail. Such a policy approach will provide certainty for developers, while at the same time allowing for innovative approaches to design.

Findings of the Sustainability Appraisal of the Cambridge Local Plan (July 2013)

23. The findings of the Sustainability Appraisal of the draft Cambridge Local Plan were that overall the plan would lead to significant positive effects in terms of the following SA objectives:
- protect and enhance the landscape setting of the city, which comprises the Cambridge Green Belt, the green corridors penetrating the urban area, the established network of multi-functional green spaces, and tree canopy cover in the city.
 - promote social cohesion and sustainability and a high quality of life by maintaining and enhancing provision for open space, sports and recreation, community and leisure facilities, including arts and cultural venues that serve Cambridge and the sub-region.
 - promote a safe and healthy environment, minimising the impacts of development and ensuring quality of life and place.
24. The appraisal noted that Policy 57's consideration of the need to link existing and new communities together, and also consideration of the design of the new community and how it will function, should have a significant positive effect in terms of creating successful new communities and also addressing deprivation through linking deprived communities to new development.
25. Policy 57 requires new buildings to include design measures to reduce environmental impact, such as renewable energy systems, in an 'architecturally sensitive way'. The appraisal noted that this requirement could reduce the number of different technologies that could be employed, but is considered reasonable given the high architectural quality of the city.
26. The appraisal noted that Policy 57 should also lead to significant positive effects in terms of creating successful communities. The combination of Policy 56 and 57 should help ensure that Cambridge's historic environment is protected and enhanced.

Key Issues raised during Proposed Submission consultation

Policy 57: Designing new buildings	
Total Representations: 16	
Object: 13	Support: 3
Objections	<ul style="list-style-type: none"> • In criterion (a) and paragraph 7.10, the phrases "high quality" and "positive impact" are too vague - there should be an explicit aim to make the city attractive and beautiful; • The policy is not in line with the NPPF which states that 'design policies should avoid unnecessary prescription or detail and should concentrate on guiding the overall scale, density, massing, height, landscape, layout, materials and access of new

	<p>development' (paragraph 58);</p> <ul style="list-style-type: none"> • The wording needs to be stronger, e.g. must not detract from the existing environment, must not be of inappropriate scale and massing etc; • This policy is both vague and unduly prescriptive; • The plan should offer examples of good design; • Masterplans should be formed and followed and architects must submit design proposals; • Require design standards that prevent the box-like bland structures that we see around Hills Road/Cherry Hinton Road junction; • The policy does not provide sufficient guidance given that other parts of the plan (Policy 60 and Appendix F) suggest tall buildings/landmark buildings may be acceptable; • The policy does not contain a restriction on the height of buildings • There is no statement about gardens; • The measures captured in the policy are wide ranging and will need particular determination and skill in enforcing; • A genuine sustainability plan requires high quality design and build to create cherished buildings that will not be knocked down and rebuilt in 20 years' time.
Support	<ul style="list-style-type: none"> • Support this policy; • Welcomes suggested 'green initiatives' mentioned in policy (Criteria (c), (d), (e) and paragraph 7.11).

Minor Modifications suggested following Proposed Submission consultation and implications for Sustainability Appraisal

27. No changes to Policy 57 Designing new buildings or the supporting text are suggested in the Addendum to the Cambridge Local Plan 2014: Proposed Submission document. There are therefore no impacts on the findings of the Sustainability Appraisal.

Policy 58: Altering and Extending Existing Buildings

EXISTING POLICY TO BE REPLACED (CAMBRIDGE LOCAL PLAN 2006)	OPTION(S) BEING TAKEN FORWARD FROM THE ISSUES AND OPTIONS REPORT (2012) AND ISSUES AND OPTIONS 2 (2013)	OPTION(S) NOT BEING TAKEN FORWARD FROM THE ISSUES AND OPTIONS REPORT (2012)
<ul style="list-style-type: none"> • 3/14 Extending 	<ul style="list-style-type: none"> • Option 66 Criteria 	<ul style="list-style-type: none"> • Not applicable

Buildings	based policy for alterations and extensions to existing buildings	
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Key issues raised during Issues and Options (2012) and Issues and Options 2 (2013) consultations:

SECTION OF THE ISSUES AND OPTIONS REPORT (2012)	KEY ISSUES ARISING FROM CONSULTATION
<p>Option 66: Criteria based policy for alterations and extensions to existing buildings</p> <p>The purpose of this option is to ensure a high quality of design for the alteration and extension of existing buildings across the city</p>	<ul style="list-style-type: none"> • Very strong support for this option; • Existing buildings need to respect their context; • Support for the idea of preparing guidance for alterations and extensions to residential property (possibly as a Supplementary Planning Document); • Would welcome criteria in respect of the impact from extensions on daylight levels to adjacent property and space between buildings; • The section should consider alterations for the purpose of improved sustainability / energy efficiency.
NEW OPTIONS ARISING FOLLOWING COMMUNITY INVOLVEMENT	
No additional options have been suggested	

Evidence base:

- Cambridge City Council (2007). Sustainable Design and Construction Supplementary Planning Document;
- Cambridge City Council Conservation Area Appraisals (various dates);
- Cambridge City Council (2006) Historic Core Area Appraisal.

How the policy came about:

28. The extension of buildings can help to make the most efficient use of land, and can prolong the life of buildings or find new uses for them. It can often provide the only way in which additional accommodation can be provided for householders or businesses. However, extensions and building alterations can have a negative impact on their surroundings if they are poorly designed. The purpose of Policy 58 is to set out a criteria based approach to the design of alterations and extensions to existing buildings, both residential and non-residential. Such an approach should make clear to applicants what needs to be demonstrated as part of a development proposal in order for it to be

considered acceptable. The Issues and Options consultation revealed that there was considerable support for this option.

29. The context of any alteration or extension was identified as a key consideration by respondents to the Issues and Options consultation. Policy 38 (Responding to Context) will apply to all new development, whether major development or extensions and alterations to existing buildings. In complementing Policy 59 (Altering and Extending Existing Buildings), Policy 56 (Responding to Context) will ensure that a thorough analysis and understanding of context of any scale of development is taken into consideration. Context matters in altering or extending buildings, for example making reference to the need for proposals including new or altered roof profiles, to use materials that are sympathetic to the existing building and surrounding area, and the need for proposals to respect the space between buildings where this contributes to the character of the area.

Findings of the Sustainability Appraisal of the Cambridge Local Plan (July 2013)

30. No adverse impacts from this Policy on the sustainability objectives were predicted as part of the Sustainability Appraisal process.

Key Issues raised during Proposed Submission consultation

Policy 58: Altering and extending existing buildings	
Total Representations: 11	
Object: 7	Support: 4
Objections	<ul style="list-style-type: none"> • The policy refers to design details which are overly prescriptive and contrary to guidance in paragraph 58 in the NPPF; • Reference should also be made to paragraph 60 of the NPPF which states: "Planning policies and decisions should not attempt to impose architectural styles or particular tastes and they should not stifle innovation, originality or initiative through unsubstantiated requirements to conform to certain development forms or styles. It is, however, proper to seek to promote or reinforce local distinctiveness"; • The policy should also apply to conservation areas, new buildings erected in gardens and to the removal of trees, hedges from gardens; • Criterion a repeats heritage policies and is not necessary. In any event, 'Local heritage assets' should not be afforded the same weight as designated assets; • Criteria (b), (c) and (d) - The wording is imprecise and potentially contradictory with criterion (b) permitting designs to contrast

	<p>with existing building form whilst criteria (c) and (d) seek designs that respect and are sympathetic to the original building;</p> <ul style="list-style-type: none"> • Criterion (e) - Proposals which increase sound/light disturbance for neighbours e.g. from creation of new car parks etc should be refused; • Criterion (g) - The policy should not promote private car usage by creating extra opportunities for their use e.g. enlarged parking areas etc; • Add a new criterion h. to require “Improve access for disabled people and help the building fully comply with Part M of the Building Regulations”; • The historic parts of the city - including those of the first quarter of the 20th century - should enjoy a presumption on retention, alteration and re-use; • It would have been helpful to have included as an annex all the listed buildings in the city to accentuate their relevance to enhancing the historical merit of Cambridge; • A map/plan of the city should be generated so that those building which are locally listed are quickly and easily identifiable. This will help inform and ease the burden of responsibility on the council to protect them.
Support	<ul style="list-style-type: none"> • Supports this policy • Need for clear policy which takes into account the factors listed, including impact on skyline and neighbourhood; • Welcome policy 58 which will protect and enhance biodiversity.

Minor Modifications suggested following Proposed Submission consultation and implications for Sustainability Appraisal

31. No changes to Policy 58: Altering and extending existing buildings or the supporting text are suggested in the Addendum to the Cambridge Local Plan 2014: Proposed Submission document. There are therefore no impacts on the findings of the Sustainability Appraisal.

Policy 59: Designing Landscape and the Public Realm

EXISTING POLICY TO BE REPLACED (CAMBRIDGE LOCAL PLAN 2006)	OPTION(S) BEING TAKEN FORWARD FROM THE ISSUES AND OPTIONS REPORT (2012) AND ISSUES AND OPTIONS 2 (2013)	OPTION(S) NOT BEING TAKEN FORWARD FROM THE ISSUES AND OPTIONS REPORT (2012)
<ul style="list-style-type: none"> 3/11 The Design of External Spaces 	<ul style="list-style-type: none"> Option 64 The design of the public realm, landscape and other external spaces; Option 81 Include reference to the enhancement of biodiversity within option 64 (the design of the public realm, landscape and other external spaces). 	<ul style="list-style-type: none"> Option 79 Enhancement of biodiversity as part of all development proposals; Option 80 Enhancement of biodiversity as part of major developments.

Key issues raised during Issues and Options (2012) and Issues and Options 2 (2013) consultations:

SECTION OF THE ISSUES AND OPTIONS REPORT (2012)	KEY ISSUES ARISING FROM CONSULTATION
<p>Option 64: The design of the public realm, landscape and other external spaces</p> <p>The aim of this option is to ensure a high quality of design in respect of external spaces as part of new development or improvements to the public realm</p>	<ul style="list-style-type: none"> Good support for the option in principle; Shared space can cause issues between road users, cyclists and pedestrians; Need to avoid street clutter too; Need to upgrade the public realm in context with the city and its historic nature; Open space needs to be provided, not commuted sums. Some suggest working with the County Council to produce guidance on the public realm; Others say no need for guidance, as highlighted in the National Planning Policy Framework; Public realm improvements should be largely Section 106 funded; Needs of elderly and disabled need to be considered.
<p>Option 79: Enhancement of biodiversity as part</p>	<ul style="list-style-type: none"> It should be amended to allow pooling of biodiversity gain in adjacent sites, nearby green spaces and adjacent corridors;

SECTION OF THE ISSUES AND OPTIONS REPORT (2012)	KEY ISSUES ARISING FROM CONSULTATION
of all development proposals	<ul style="list-style-type: none"> • The requirement to minimise the impacts of development on biodiversity and provide net gains in biodiversity is included in the National Planning Policy Framework. It is not necessary to repeat the policy in the Local Plan, it should be incorporated into Option 64 (Design) and the wording should reflect the wording in the National Planning Policy Framework; • Guidance in this regard including opportunities to reduce costs through identifying and replicating successful approaches should be developed.
Option 80: Enhancement of biodiversity as part of major developments	<ul style="list-style-type: none"> • Less desirable than Option 79 as it does not apply to all developments.
Option 81: Include reference to biodiversity within Option 64 (the design of the public realm, landscape and other external spaces)	<ul style="list-style-type: none"> • Less desirable than Option 79 as it does not apply to all developments; • It would be better if Option 79 was added to Option 64; • The requirement to minimise the impacts of development on biodiversity and provide net gains in biodiversity is included in the National Planning Policy Framework. It is not necessary to repeat the policy in the Local Plan, it should be incorporated into Option 64 (Design) and the wording should reflect the wording in the National Planning Policy Framework; • So long as 'public realm' includes developments of less than 10 houses, a unified approach is welcome; • Several statements of support for a policy of this nature; • Some sites have not been designated despite their wildlife value e.g. Chesterton Sidings; • No need for a policy but detailed guidance should be provided in a Supplementary Planning Document on Nature Conservation issues; • Support the inclusion of a biodiversity enhancement programme but suggest it should be wider than the options presented; • Worth noting the value of allotments.
NEW OPTIONS ARISING FOLLOWING COMMUNITY INVOLVEMENT	
No additional options have been suggested.	

Evidence base:

- Urban Design Compendium (Volumes 1 and 2);
- Cambridgeshire Quality Charter for Growth (2008);
- Cambridge City Council (2007). Sustainable Design and Construction Supplementary Planning Document;
- DETR (2000). By Design. Urban design in the planning system: towards better practice;
- Cambridgeshire Green Infrastructure Strategy (2011);
- Cambridge City Council, Public Art Supplementary Planning Document (2010);
- Cambridgeshire County Council (2007) Cambridgeshire Design Guide for Streets and the Public Realm.

How the policy came about:

32. Policy 59 is consistent with the National Planning Policy Framework, which requires planning policies to positively address the connections between people and places and the integration of new development into the natural, built and historic environment. The advantage of such a policy approach is that it will enable the specific circumstances of each development proposal to be considered as part of the overall design process. As such, it will help to ensure high quality design not just of buildings themselves, but the spaces between buildings, and help enhance the local built and natural environment.
33. This criteria based policy approach also enables the specific circumstances of each development proposal to be considered as part of the overall design process. As such, it will help to ensure high quality design not just of buildings themselves, but the spaces between buildings, and help enhance the local built and natural environment. Requirements to 'green' and co-ordinate developments into their surroundings will enhance the function, character and amenity value of spaces, as well as increasing the provision of green infrastructure. Additionally, requirements to integrate surface water management into the overall design of development should also address key issues relating to flood risk and climate change adaptation.
34. This policy not only applies to the provision of new public realm, but also existing streets and spaces within the city to ensure the distinctive and special character of Cambridge is protected and enhanced. This is critical to ensuring the maintenance and enhancement of Cambridge's public realm, which acts as a setting for a wealth of historic buildings. The means by which public realm works are funded will vary and may include developer contributions.
35. Cambridge City Council and Cambridgeshire County Council have a long history of working together on projects pertaining to the public realm. Guidance in the form of the Cambridgeshire Design Guide for Streets and Public Realm (2007), the County's Housing Estate Road Construction Specification (January 2011), and the national guidance "Manual for Streets" are used extensively to guide

the design of the public realm. There is a close level of co-operation between the County and City Councils and a number of highways improvements are promoted, designed, funded and delivered by Cambridge City Council though are subject to the approval of the County Council as highways authority. The need for a policy in this regard is clear; the public realm and external environment is a crucial part of the image of Cambridge.

36. Policy 59 also includes reference to the enhancement of biodiversity as part of all new development proposals, with proposals for major developments needing to be accompanied by the council's Biodiversity Checklist. This approach takes forward Option 81 of the Issues and Options Report (2012). This approach allows for biodiversity to be considered in an integrated manner with public realm and landscaping issues, ensuring that options for biodiversity enhancement are explored by all developments without creating an overly onerous, costly and bureaucratic regime for all developments to follow. In order to maintain the use of the biodiversity checklist approach for major developments, it was suggested that the checklist is referenced within the supporting text of Policy 59. Officers will explore the best way of ensuring that the checklist is submitted as part of planning application, for example through the Local List. This would ensure the continued use of the biodiversity checklist and the associated inclusion of biodiversity enhancement measures in new major developments.

Findings of the Sustainability Appraisal of the Cambridge Local Plan (July 2013)

37. The findings of the Sustainability Appraisal of the draft Cambridge Local Plan, were that overall the plan would lead to significant positive effects in terms of the following SA objectives:
- protect and enhance the landscape setting of the city, which comprises the Cambridge Green Belt, the green corridors penetrating the urban area, the established network of multi-functional green spaces, and tree canopy cover in the city.
 - promote social cohesion and sustainability and a high quality of life by maintaining and enhancing provision for open space, sports and recreation, community and leisure facilities, including arts and cultural venues that serve Cambridge and the sub-region.
 - promote a safe and healthy environment, minimising the impacts of development and ensuring quality of life and place.
38. The appraisal noted that Policy 59 (criterion h) requires landscaping to incorporate trees, surface water management and microclimate into landscape and public realm schemes and also for planting to be climate resilient, which should contribute towards mitigating the urban heat island effect through providing vegetation which cools the environment through transpiration and providing shade. This effect would be supported by Policy 31 which allows green roofs and Policy 71 which protects mature trees.

39. The combination of 55, 56 and 59 should ensure that development proposals lead to significant positive effects in terms of encouraging proposals that lead to high quality design and an improved public realm.

Key Issues raised during Proposed Submission consultation

Policy 59: Designing landscape and the public realm	
Total Representations: 7	
Object: 6	Support: 1
Objections	<ul style="list-style-type: none"> • Why do these provisions only apply to new developments? Why do they not apply to conservation areas? The conservation policies do not currently protect conservation areas from constant degradation to their existing features that positively contribute to the quality and character of the area; • Criterion (h) - Concerned by the reference to the general use of native species in schemes, as these are not always appropriate in design terms. Instead favour using non-native species to increase the ecological value of designed landscapes, and existing and new more formal urban parks; • The creation of home-zones on thoroughfares such as Tenison Road is critical to residents 'owning' and identifying with the area within which they live; • Plantings should be used to help disabled people wayfind providing they do not create slip or trip hazards; • Actual figures should be put on these aims so they are not open to interpretation e.g. 10% of all land to be used for green space.
Support	<ul style="list-style-type: none"> • Support this policy including the use of landscape design as part of a holistic approach to urban and rural developments.

Minor Modifications suggested following Proposed Submission consultation and implications for Sustainability Appraisal

40. No changes to Policy 59: Designing landscape and the public realm or the supporting text are suggested in the Addendum to the Cambridge Local Plan 2014: Proposed Submission document. There are therefore no impacts on the findings of the Sustainability Appraisal.

Policy 60: Tall Buildings and the Skyline in Cambridge

EXISTING POLICY TO BE REPLACED (CAMBRIDGE LOCAL PLAN 2006)	OPTION(S) BEING TAKEN FORWARD FROM THE ISSUES AND OPTIONS REPORT (2012) AND ISSUES AND OPTIONS 2 (2013)	OPTION(S) NOT BEING TAKEN FORWARD FROM THE ISSUES AND OPTIONS REPORT (2012)
<ul style="list-style-type: none"> Policy 3/13 Tall Buildings and the skyline 	<ul style="list-style-type: none"> Option 72 Criteria based tall buildings policy 	<ul style="list-style-type: none"> Option 73 Policy identifying specific areas suitable for tall buildings Option 74 Limits on Building Heights

Key issues raised during Issues and Options (2012) and Issues and Options 2 (2013) consultations:

SECTION OF THE ISSUES AND OPTIONS REPORT (2012)	KEY ISSUES ARISING FROM CONSULTATION
<p>Option 72: Criteria based tall buildings policy</p>	<ul style="list-style-type: none"> We need to emphasise the city’s heritage and approve only mid-height buildings; The historic core is particularly unsuitable for tall buildings; This could be used in conjunction with Option 73 (identifying specific areas suitable for tall buildings) to create individual, iconic and slightly taller buildings in some areas and groups of significantly taller buildings away from the city’s historic core; Overall bulk of buildings must also be considered carefully; Tall buildings do not fit with Cambridge and should only be allowed in exceptional cases; The criteria must be much more demanding without being restrictive. High quality materials and craftsmanship should be included. Aesthetic values such as colour, texture, contrast, detail and massing need to be taken into account. Tall buildings should only be for extraordinary exceptions; Support the development of the policy supported by guidance setting out design and locational criteria in order to assess the suitability of development proposals on a case by case basis; Tall buildings can work well in the right place if proper thought is given to design;

SECTION OF THE ISSUES AND OPTIONS REPORT (2012)	KEY ISSUES ARISING FROM CONSULTATION
	<ul style="list-style-type: none"> • It would be better to have a policy that precludes tall buildings unless they can clearly demonstrate that they will not result in harm to the setting of historic buildings or the historic core, including more distant views of the city's skyline; • Need to know what the Council's definition of tall is.
Option 73: Policy identifying specific areas suitable for tall buildings	<ul style="list-style-type: none"> • Tall buildings can provide a positive contribution to the street scene, the Compass House site within the Eastern Gate would be an area suitable for tall buildings; • Specifying areas for tall buildings is unnecessary, development should respond to local character and distinctiveness.
Option 74: Limits on buildings heights	<ul style="list-style-type: none"> • Specifying a maximum height for buildings is unnecessary. An upper limit might encourage developers to build to just below it; • A policy which limits building heights is needed; • Need a policy like this to protect the historic core; • The limit should be 5 storeys; • Needs to be one height restriction over the historic core and a less onerous but proportionate one over the rest of the city; • A policy like this would limit innovative design and would reduce the opportunity to make the most efficient use of land which in turn would impact on development viability; • A criteria based approach that deals with tall buildings on a case by case basis would be better; • Height should relate to function and purpose so a rigid limit is not appropriate; • One of the attractions of Cambridge is its human scale. The gradual encroachment of tall buildings negatively impact on this; • Area wide restrictions on building heights would be unnecessarily prescriptive; • Need to safeguard the historic skyline; • It is essential that building height and density is in keeping with neighbouring areas, particularly where domestic buildings are concerned; • There should be guidelines on the height of buildings permitted; • Height should be measured in absolute terms and not just by the number of storeys as residential and

SECTION OF THE ISSUES AND OPTIONS REPORT (2012)	KEY ISSUES ARISING FROM CONSULTATION
	<p>commercial buildings have different floor heights;</p> <ul style="list-style-type: none"> • Missing comment about rooftop visual garbage (air conditioning, lifts, aerials) that can be detrimental to views; • Preservation of views of open space needs to include the River Cam corridor.
NEW OPTIONS ARISING FOLLOWING COMMUNITY INVOLVEMENT	
No additional options have been suggested.	

Evidence base:

- Cambridge City Council (2012). Guidance for the application of Policy 3/13 (Tall Buildings and the Skyline) of the Cambridge Local Plan (2006);
- English Heritage/CABE (2007). Guidance on Tall Buildings

How the policy came about:

41. The National Planning Policy Framework (paragraph 59) is supportive of guiding the height of new developments in relation to neighbouring buildings and local areas and recommends that it should be addressed through local design policies. Consultation at the Issues and Options stage revealed that the majority of respondents supported Option 72: Criteria based Policy for Tall Buildings, which is now reflected in Policy 60 above. Such an approach is also consistent with the document “Guidance for the application of Policy 3/13 (Tall Buildings and the Skyline) of the Cambridge Local Plan (2006)” produced in 2012 by the City Council.
42. In addition to Option 72 noted above, two other options were presented at the Issues and Options stage, including Option 73: Policy Identifying specific areas for tall buildings, and Option 74: Limits on Building Heights. Of the three options presented relating to tall buildings, Option 73 received the most objections. Comments suggested that a location specific or ‘zoning-based’ policy would be unnecessary and that development should respond to local character and distinctiveness. Several representations suggested combining Options 72 and 73 to create a criteria based policy that supports the development of taller buildings in certain locations around the city. It is considered that due to the modest scale of the city, there is no need and little opportunity to create zoned areas for tall buildings. Whilst some locations lend themselves to localised increases in height, such as at local nodes (focal points of urban activity), key junctions and corners, at the ends of vistas, and at transport intersections, zoning for “tall buildings” would be crude in application and would not be responsive to local context or the particular

characteristics of different parts of Cambridge. For this reason, combining Options 72 and 73 was not pursued.

43. A blanket limit on height in the city is considered equally unsuitable, either because it could be too flexible in some areas or too restrictive in others. For example, given the sensitivity of important historic landmark buildings in the city centre, new buildings need to respect established views in this area and not “compete” against iconic college or ecclesiastical buildings. In other areas e.g. key nodes that are developing or could further develop, a specific height limit may be unresponsive to changing circumstances. A ‘context led’ approach for the development of tall buildings, as proposed within Option 72 at the Issues and Options stage and now put forward in Policy 60, is more appropriate as it reinforces the need to analyse and respond to local context and character when considering tall buildings.
44. In clarifying what constitutes a ‘tall building’, the definition adopted in the Council’s guidance noted earlier is taken from English Heritage/CABE ‘Guidance on Tall Buildings (2007)’: ‘A tall building is any structure that breaks the existing skyline and/or is significantly taller than the surrounding built form’. Where comprehensive or large-scale development sites are identified, maximum building heights, along with other parameters, would be established as part of the Outline Planning permission in line with DCLG Circular 01/2006.
45. With regard to addressing roof top plant, lift overruns, aerials and air conditioning, such features can often impact negatively on the quality of buildings from key views. Rooftop plant and other services should be integrated into building design, being well designed and discreetly located. The impact of roof plant should be fully evaluated in applications and shown on submissions. The subject of such plant is specifically addressed in Policy 58: Designing New Buildings, which notes plant must be “architecturally integrated” into buildings.

Findings of the Sustainability Appraisal of the Cambridge Local Plan (July 2013)

46. The findings of the Sustainability Appraisal of the draft Cambridge Local Plan were that overall the plan would lead to significant positive effects in terms of the following SA objectives:
 - Protect and, where appropriate, enhance the character and quality of the Cambridge skyline.
 - Contribute to the positive management of change in the historic environment, protecting, enhancing and maintaining the unique qualities and character of Cambridge, including the River Cam corridor, the city’s wider landscape and setting, and its designated and undesignated heritage assets for the future.

47. The appraisal supported the inclusion of this policy / guidance will help to contribute to the sustainability objective of ensuring that the scale of new development is sensitive to the existing key landmark buildings and low lying topography of the City.
48. The appraisal noted that Policy 60 will have positive implications given the concentration of such assets in the city centre’s historic core.

Key Issues raised during Proposed Submission consultation

Policy 60: Tall buildings and the skyline in Cambridge	
Total Representations: 19	
Object: 17	Support: 2
Objections	<ul style="list-style-type: none"> • This is a methodology not a policy and a specific policy is not necessary; • Omit the words ‘or exceed 19m within the historic core (see Section Three on City Centre) or 13m outside it.’; • The requirement for all development over 19m in the historic core and 13m elsewhere to be assessed against criteria a.to e. is too onerous and too prescriptive for policy; • This policy should be consistent with Policy 37 which would appear to limit developments to a maximum of 15m in the city’s core; • Need a specific measurable level above which development in Cambridge will not be considered. Please set a height limit of around 19 metres; • The term 'significantly taller' than surrounding buildings is unclear and needs to be clearly defined to remove any ambiguity; • Some parts of the historic core comprise two-storey height dwellings. It is undesirable to specify a building height in the historic core where other considerations such as the historic legibility and character of the conservation area should be accorded great weight. In particular, the area is defined by the spires and towers relating to colleges and churches; such buildings have historically been dominant, and should continue to be so; • Criterion (a) - The need for a 'visual' assessment should refer to a 'visual impact assessment' as it is the 'impact' that needs assessing not the 'visual' quality of the development. The Local Authority should encourage developers to use Landscape and Visual Impact Assessment as a general tool to assess impact of

	<p>buildings on the skyline in the historic core especially;</p> <ul style="list-style-type: none"> • Criteria (a) and (c) - Visual (rather than 3-D) representations are inadequate to demonstrate potential impacts. Full-scale on-site representation should be required to enable comprehensive assessment of potential impacts; • Criterion (c) - Please include massing here, many objections to new tall buildings have made reference to this point and it is not mentioned here • Criterion (d) - The proposed policy does not recognise the importance of retaining homogeneity of skyline especially in residential areas of the city. Allowing a four storey building (or more) on a road of two storey housing would have a very negative impact on the streetscape; • Criterion (d) - The loss of light and creation of wind tunnels by tall buildings should be ameliorated; • Amend the policy with provision of a new criterion (f) "All tall buildings should have passenger lifts serving all floors"; • Ban all tall buildings: unless a new church spire is to be built, or a church tower, there is no hope that any modern tall building will in any way enhance the skyline; • Other considerations such as the historic legibility and character of the conservation area should be accorded great weight; • Policy should consider lifetime flexibility of use; • The policy needs to be based on a historic environment strategy for Cambridge and its setting; • The significance of the historic core is set out in the city council's historic core character appraisal, which should be used to assess development; • The historic core should be clearly defined; • Proposals need to be considered in terms of impacts on the setting of the historic city as a whole, not just the core and approaches. Impacts on long views outside the city need to be considered (e.g. from Grantchester Meadows, and from higher ground to the west and south); • Sustainability is an issue that will also need careful measuring and should be included in the policy together with criteria by which sustainability is to be measured; • Planning guidance needs to be developed alongside this policy so as to prevent exploitation; • It is the practical implementation of this objective which remains
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	key.
Support	<ul style="list-style-type: none"> The objective of maintaining or enhancing the overall character and qualities of the skyline as the city grows is laudable.

Minor Modifications suggested following Proposed Submission consultation and implications for Sustainability Appraisal

49. As a result of assessment, one minor modification is suggested for Policy 60 Tall buildings and the skyline in Cambridge. This change is in the Addendum to the Cambridge Local Plan 2014: Proposed Submission document marked as PM/7/002.
50. For clarity and in response to a representation (representation 27608) it is suggested that criterion b of Policy 60 reads:
- “b. ~~historical impact~~ impact on the historic environment – applicants should demonstrate and quantify the impact of proposals on recognised heritage assets or other sensitive receptors (view of, backdrop and setting), assessed on a site-by-site basis but including impact on key landmarks and viewpoints, as well as from the main streets, bridges and open spaces in the city centre and from the main historical approaches, road and river, to the historic core. Where proposals impact on the historic core they should retain the character of Cambridge as a city of spires and towers emerging above the established tree line”.
51. Following consideration of the impact of these changes on the Sustainability Appraisal Framework, it has been concluded that these changes do not materially alter the findings of the Sustainability Appraisal.

Policy 61: Conservation and Enhancement of Cambridge’s Historic Environment

EXISTING POLICY TO BE REPLACED (CAMBRIDGE LOCAL PLAN 2006)	OPTION(S) BEING TAKEN FORWARD FROM THE ISSUES AND OPTIONS REPORT (2012) AND ISSUES AND OPTIONS 2 (2013)	OPTION(S) NOT BEING TAKEN FORWARD FROM THE ISSUES AND OPTIONS REPORT (2012)
<ul style="list-style-type: none"> 4/9 Scheduled Ancient Monuments/Archaeological Areas 4/10 Listed Buildings 4/11 Conservation Areas. 	<ul style="list-style-type: none"> Option 68 Protection and enhancement of Cambridge’s historic environment 	<ul style="list-style-type: none"> Not applicable

Key issues raised during Issues and Options (2012) and Issues and Options 2 (2013) consultations:

SECTION OF THE ISSUES AND OPTIONS REPORT (2012)	KEY ISSUES ARISING FROM CONSULTATION
<p>Option 68: Protection and enhancement of Cambridge's historic environment</p>	<ul style="list-style-type: none"> • Recent development of tall buildings has detracted from the skyline. High rise should not be a feature of Cambridge; • Historic buildings, rivers and green spaces are essential to the character of Cambridge; • Cambridge's historic environment is what makes it special, it is internationally important; • This section tries to cover too much ground and should be split up. Too many issues to be covered by one policy; • 'Views' which have been used extensively to argue against development in large areas of the city need to be carefully considered. There is no definition of 'local' or 'strategic' views; • Support the protection of the wider setting of the city; • There is also a need to maintain the usability of historic buildings, heating and insulation for example; • Buildings may not just have architectural merit but also may be important in terms of local history; • The 2006 Local Plan should be a template for any new policy; • The policy should not be unnecessarily prescriptive or restrictive and should support 'sustainable development'; • A policy on Article 4 directions; • Enhance protection of conservation areas; • Protection and enhancement should include 'in line with ecological needs'; • Protection of views should include views that are created; • The current policies on Listed Buildings and Conservation Areas are fine and should be replicated together with a policy on archaeology; • There is a need to retrofit energy efficient improvements to Cambridge's historic stock; • There may be instances where 'wider public benefit' should be taken into account in relation to proposed works/development to historic buildings; • Enhancement must include stringent approval of materials; • A separate policy on the setting of designated heritage

	<p>assets would be useful</p> <ul style="list-style-type: none"> • There is a need to recognise that Buildings of Local Interest are undesignated heritage assets. Consequentially the wider public benefit required to outweigh their loss will be less than for designated heritage assets; • More important to protect the historic environment where it is damaged e.g. Newmarket Road. • English Heritage strongly support the coverage outlined in Option 68, with the caveat that the aspects to be covered are also identified within an overall strategy e.g. strategic option.
NEW OPTIONS ARISING FOLLOWING COMMUNITY INVOLVEMENT	
No additional options have been suggested.	

Evidence base:

- Cambridge City Council (2006) Historic Core Area Appraisal;
- Cambridge City Council, Conservation Area Appraisals (various dates);
- Cambridgeshire County Council. Cambridgeshire Historic Environment Record;
- Cambridge City Council Local List of Heritage Assets.

How the policy came about:

52. One of the twelve principal objectives of planning set out in paragraph 17 of the National Planning Policy Framework is the conservation of heritage assets in a manner appropriate to their significance. In line with Section 12 of the National Planning Policy Framework, it is necessary to set out a positive strategy for the conservation and enjoyment of the historic environment of Cambridge and for the ongoing sustainable development of the city by articulating the issues that the council considers important in the consideration of development affecting the historic environment.
53. The existing Cambridge Local Plan 2006 contains four policies addressing the city’s historic environment, including reference to archaeological assets, listed buildings, conservation areas and buildings of local interest (Policies 4/9 – 4/12). Through the publication of the National Planning Policy Framework and its predecessor document on the historic environment (Planning Policy Statement 5), the national approach to these assets has evolved. The different elements of the historic environment have been united under the term ‘heritage asset’, both designated and non-designated.
54. Following these changes, Option 68 of the council’s Issues and Options report (2012) sets out the need to consider the conservation and enhancement of heritage assets, preservation of the wider setting of the city and the setting of specific heritage assets in Cambridge, an internationally renowned city for the quality of its historic built and natural environment. The forthcoming local

plan policy needs to set out a positive approach to the historic environment, taking into account the following, which build upon the content of existing policies contained within the current Local Plan:

- The continued conservation and enhancement of existing, and, where appropriate, designation of new conservation areas. This would need to be supported by the ongoing production and review of conservation area appraisals;
- The continued conservation and enhancement of listed buildings, historic parks and gardens and scheduled monuments, buildings of local interest and other heritage assets;
- The identification and, where appropriate, protection of the city's archaeological heritage and assets of local importance;
- The protection of strategic and local views, the wider historic setting of the city and the setting of heritage assets, as well as, where applicable, their townscape value; and
- Addressing heritage at risk (including those assets on the Heritage at Risk Register) in a positive and proactive manner.

Findings of the Sustainability Appraisal of the Cambridge Local Plan (July 2013)

55. The findings of the Sustainability Appraisal of the draft Cambridge Local Plan were that overall the plan would lead to significant positive effects in terms of the following SA objectives:
 - Be of the highest quality, in terms of design excellence and innovation, addressing its impact upon its surroundings and embracing the principles of sustainable design and construction.
 - Contribute to the positive management of change in the historic environment, protecting, enhancing and maintaining the unique qualities and character of Cambridge, including the River Cam corridor, the city's wider landscape and setting, and its designated and undesignated heritage assets for the future.
56. The appraisal noted that this policy alongside other design policies which require consideration of the relationship between the site and its surroundings should help to ensure adequate protection of the Conservation Areas.
57. The appraisal noted that the requirements of policies 61 & 62 should have positive impacts on the townscape sustainability objectives by helping to ensure that Cambridge's distinct historic environment is protected and enhanced throughout the duration of the plan period.
58. The appraisal noted that the combination of Policy 55 and 61 should help to ensure that the historic core of the city centre is protected from development that is unsuitable, thus resulting in a range of social and economic benefits, and significant positive effects.

Key Issues raised during Proposed Submission consultation

Policy 61: Conservation and enhancement of Cambridge's historic environment	
Total Representations: 21	
Object: 17	Support: 4
Objections	<ul style="list-style-type: none"> • The policy is not strong enough; • The policy's criteria are unduly restrictive; • The policy should refer to paragraph 60 of the NPPF; • This policy is not distinctive to Cambridge, or proactive in its approach to the historic environment of the city, as envisaged in the NPPF; • The policy should clearly distinguish between designated and undesignated heritage assets and clarify circumstances in which works to heritage assets would be justified; • The policy should commit to the preparation of an historic environment strategy; • More reference to archaeology should be made in the supporting text to the policy; • Any development should preserve/enhance conservation areas; • Remove criterion (e) from the policy as it undermines the policy; • No outline applications should be allowed in conservation areas; • In paragraph 7.20, more reference to the character and compactness of the city required and a fuller account of the registered historic parks in the city is needed; • In paragraph 7.23, the reference in this paragraph to listed building descriptions should be amended to refer, in addition, to other appraisal work. Evidence base for designated heritage assets should be recognised as carrying significant weight. The Planning (Listed Building and Conservation Area) Act 1990 includes specific requirements relating to preservation of listed buildings and their settings, and preservation and enhancement of conservation areas. The evidence base for these assets has a particular role, and it would be appropriate to distinguish this from other guidance. • Add specific reference to historic parks and gardens in Appendix C.
Support	<ul style="list-style-type: none"> • General support; • Support, with regular review of conservation areas.

Minor Modifications suggested following Proposed Submission consultation and implications for Sustainability Appraisal

59. As a result of assessment, three minor modifications are suggested for criterion e of Policy 61 Conservation and enhancement of Cambridge's historic environment and paragraphs 7.20 and 7.26 of the supporting text. These changes are in the Addendum to the Cambridge Local Plan 2014: Proposed Submission document marked as PM/7/003, PM/7/004 and PM/7/005.

60. With regards to the first of these modifications (PM/7/003), in order to conform with the requirements of the National Planning Policy Framework, and in respond to a representation (representation number 26267) it is suggested that this criterion be reworded to read:

“e. provide clear justification for any works that would lead to harm or substantial harm to a heritage asset yet be of ~~wider~~ substantial public benefit, through detailed analysis of the asset and the proposal.”

61. In response to a representation from English Heritage (representation number 27435) and to highlight the importance of retaining the compact nature of Cambridge, proposed modification PM/7/004 suggests the following rewording of paragraph 7.20 of the supporting text:

“Cambridge's historic and natural environment defines the character and setting of the city, and contributes significantly to Cambridge residents' quality of life. ~~It is important to maintain and enhance the historic and natural environment against the background of a successful, growing city.~~ Against the backdrop of a successful, growing city, it is important to conserve and enhance the historic and natural environment to ensure that Cambridge remains compact and walkable and that the connection between the city's historic core and the wider countryside is maintained. The city has a varied architectural heritage, from the internationally recognised grandeur of King's College Chapel to the more modest vernacular buildings reminiscent of an East Anglian market town. The number of grade I and grade II* listed buildings is high, with an exceptional concentration of collegiate buildings around the arc of the River Cam. Green open spaces such as the commons, greens and The Backs are also key features of the city's life and layout. In addition, there are a number of registered parks and gardens of special historic interest, including college grounds, cemeteries and the Cambridge University Botanic Garden.”

62. For clarity, the final proposed modification (PM/7/005) suggests the addition of a final sentence to paragraph 7.26 as follows:

“Given the high potential for assets of archaeological importance in the urban area, applicants should also obtain archaeological advice. Consideration needs to be given to the potential for harm or substantial harm to such assets, and to

their setting. : Further information on heritage assets can be obtained from the Cambridgeshire Historic Environment Record."

63. Following consideration of the impact of these changes on the Sustainability Appraisal Framework, it has been concluded that these changes do not materially alter the findings of the Sustainability Appraisal.

Policy 62: Local Heritage Assets

EXISTING POLICY TO BE REPLACED (CAMBRIDGE LOCAL PLAN 2006)	OPTION(S) BEING TAKEN FORWARD FROM THE ISSUES AND OPTIONS REPORT (2012) AND ISSUES AND OPTIONS 2 (2013)	OPTION(S) NOT BEING TAKEN FORWARD FROM THE ISSUES AND OPTIONS REPORT (2012)
<ul style="list-style-type: none"> 4/12 Buildings of Local Interest 	<ul style="list-style-type: none"> Option 69 Protection of Buildings of Local Interest and development of a local list 	<ul style="list-style-type: none"> Not applicable

Key issues raised during Issues and Options (2012) and Issues and Options 2 (2013) consultations:

SECTIONS OF THE ISSUES AND OPTIONS REPORT (2012)	KEY ISSUES ARISING FROM CONSULTATION
<p>Option 69: Protection of Buildings of Local Interest and Development of a Local List</p> <p>The aim of this option is to ensure the protection of Buildings of Local Interest as far as practically possible.</p>	<ul style="list-style-type: none"> There are no requirements stated within the National Planning Policy Framework relating to locally listed buildings. A specific policy dealing with Buildings of Local Interest is out of step with the National Planning Policy Framework; Colleges depend on being able to use and modify their buildings in order to achieve their educational purpose. Colleges are not simply curators of buildings which others decide should be on a local list and at the expense of their practical use; There is no reason why, in a compact city such as Cambridge where over 1000 buildings are listed and almost ¼ of the city covered in Conservation Areas, Buildings of Local Interest should be considered so valuable to the city's heritage that they should be given a higher level of protection than that contained within the National Planning Policy Framework; The Council's reason for designation of Buildings of Local Interest needs to be far more transparent and there

	<p>should be a statement of what is significant about each Building of Local Interest.</p> <ul style="list-style-type: none"> English Heritage supports the inclusion of a policy for Buildings of Local Interest. They also note that consideration should also be given to the use of Article 4 Directions to afford additional protection to Buildings of Local Interest.
NEW OPTIONS ARISING FOLLOWING COMMUNITY INVOLVEMENT	
No additional options have been suggested.	

Evidence base:

- Cambridge City Council Local List of Heritage Assets

How the policy came about:

- Paragraph 135 of the National Planning Policy Framework sets out the need to take into account the effect of an application on the significance of a non-designated heritage asset in determining the application. In weighing applications that directly or indirectly affect non-designated heritage assets, a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset. Buildings, structures, features and gardens of local interest can be locally assessed by the council and are considered to fall within the definition of non-designated heritage assets. Paragraph 126 of the National Planning Policy Framework also states the requirement for local planning authorities to have a “positive strategy” for the “conservation and enjoyment of the historic environment...”, including maintaining a list of heritage assets. Furthermore, the definition of a heritage asset within the National Planning Policy Framework includes designated heritage assets and assets identified by the local planning authority (including local listing).
- Policy 4/12 Buildings of Local Interest in the Cambridge Local Plan 2006 addresses development affecting buildings of local interest only. Through the National Planning Policy Framework and in keeping with its predecessor document addressing the historic environment (Planning Policy Statement 5), the scope of non-designated heritage assets has widened since the adoption of the Cambridge Local Plan 2006. As such, the council recognises the need to address gardens, structures and other features of local interest, in addition to buildings of local interest. This matter was addressed through the inclusion of Option 69 Protection of Buildings of Local Interest and development of a local list in the council’s Issues and Options report (2012).
- Currently, there are over 1,000 buildings of local interest in Cambridge on the council’s Local List of Heritage Assets. These buildings have been locally designated because of their architectural merit and, in some cases, their historical associations. They may contribute to and help to define the

character of the townscape of an area, or be significant in the historical and architectural development of the city. Many are nineteenth and twentieth century buildings and some street furniture is also included. The inclusion of a building on the Local List of Heritage Assets does not preclude the effective re-use of buildings for a range of purposes. Retention and re-use of a building of local interest will always be sought in the first instance, as approximately 15 buildings of local interest have been demolished in the last 5-10 years. Such a policy approach helps to address the difficulties that the council has faced in protecting buildings of local interest, which add to the character and distinctiveness of the city. While there could be a concern from some that the retention of buildings of local interest may have an impact on the viability of schemes, the adaptive reuse of buildings is almost always the most sustainable option.

67. When not located in a conservation area, planning permission for the demolition of a building of local interest is not required. When located in a conservation area, Conservation Area Consent is required for their demolition, and Local Plan Policy 4/12 has been applied in such cases since 2006. In order to further safeguard buildings of local interest outside conservation areas, English Heritage has suggested that consideration be given to the use of Article 4 directions to remove the permitted development rights for demolition of buildings of local interest. This would mean that the demolition of a building of local interest outside a conservation area would require planning permission for this process. The council will consider the need for Article 4 directions for this purpose. However, it should be noted that the introduction of Article 4 directions would involve a separate legal process and cannot be carried out through the review of the local plan.

Findings of the Sustainability Appraisal of the Cambridge Local Plan (July 2013)

68. The findings of the Sustainability Appraisal of the draft Cambridge Local Plan were that overall the plan would lead to significant positive effects in terms of the following SA objectives:
 - Be of the highest quality, in terms of design excellence and innovation, addressing its impact upon its surroundings and embracing the principles of sustainable design and construction.
 - Contribute to the positive management of change in the historic environment, protecting, enhancing and maintaining the unique qualities and character of Cambridge, including the River Cam corridor, the city's wider landscape and setting, and its designated and undesignated heritage assets for the future.
69. The appraisal noted that the requirements of policies 61 & 62 should have positive impacts on the townscape sustainability objectives by helping to ensure that Cambridge's distinct historic environment is protected and enhanced throughout the duration of the plan period.

70. The appraisal noted that the combination of Policy 55, 61 and 62 would, given the scale of proposed development and the sensitivity and significance of the area's heritage assets, these policies are likely to result in significant positive effects. These should help ensure that any potential impacts of development at Mount Pleasant House (which could impact on a nearby historic park and garden, a building of local interest, and local archaeology).

Key Issues raised during Proposed Submission consultation

Policy 62: Local heritage assets	
Total Representations: 11	
Object: 10	Support: 1
Objections	<ul style="list-style-type: none"> • Policy does not appropriately consider the significance of a local heritage asset and is not compliant with the NPPF. The policy should be reworded to bring it in line with the NPPF • Policy 62 is overly restrictive and statutory provisions already exist for listed buildings and conservation areas which are adequate; • Designation of local heritage assets may not be consistent and rigorous; • Appendix G should be amended to set out criteria for the designation of locally listed structures, features and gardens; • Retention of local heritage assets can affect the wider regeneration of an area – this should be reflected in the policy with a clause requiring justification for the loss of a heritage asset; • Policy should be strengthened to prevent any loss of an asset; • Further local heritage assets still need to be identified, including newer buildings and gardens; • Permission should always be required for changes to local heritage assets; • All proposed local designations should be notified to owners and the justification published for consultation prior to designation being confirmed.
Support	<ul style="list-style-type: none"> • General support.

Minor Modifications suggested following Proposed Submission consultation and implications for Sustainability Appraisal

71. As a result of assessment, one minor modification is suggested for Policy 62 Local Heritage Assets. This change is in the Addendum to the Cambridge Local Plan 2014: Proposed Submission document marked as PM/7/006.

72. In order to conform with the National Planning Policy Framework’s approach to undesignated heritage assets, and in response to a representation from English Heritage (representation number 27448), it is suggested that this Policy be reworded as follows:

~~“There is a general presumption in favour of~~ The council will actively seek the retention of local heritage assets, including buildings, structures, features and gardens of local interest as detailed in the Council’s local list and as assessed against the criteria set out in Appendix G of the plan.

Where permission is required, proposals will be permitted where they retain the significance, appearance, character or setting of a local heritage asset.”

73. Following consideration of the impact of this change on the Sustainability Appraisal Framework, it has been concluded that this change does not materially alter the findings of the Sustainability Appraisal.

Policy 63: Works to a Heritage Asset to Address Climate Change

EXISTING POLICY TO BE REPLACED (CAMBRIDGE LOCAL PLAN 2006)	OPTION(S) BEING TAKEN FORWARD FROM THE ISSUES AND OPTIONS REPORT (2012) AND ISSUES AND OPTIONS 2 (2013)	OPTION(S) NOT BEING TAKEN FORWARD FROM THE ISSUES AND OPTIONS REPORT (2012)
<ul style="list-style-type: none"> • Not applicable 	<ul style="list-style-type: none"> • Option 70 Works to a heritage asset to address climate change 	<ul style="list-style-type: none"> • Not applicable

Key issues raised during Issues and Options (2012) and Issues and Options 2 (2013) consultations:

SECTION OF THE ISSUES AND OPTIONS REPORT (2012)	KEY ISSUES ARISING FROM CONSULTATION
Option 70: Works to a heritage asset to address climate change	<ul style="list-style-type: none"> • There are occasions when maintaining the existing use may require a more substantial loss of significance to a heritage asset than a new use; • It is not clear what the third bullet point (in the case of change of use; ensuring the sympathetic reuse of the heritage asset) brings to the consideration of climate change and heritage assets; • The option should be more weighted to protect the historic asset; • Conservation and renewal need to allow for embodied

	<p>energy;</p> <ul style="list-style-type: none"> • The age and importance of the building should not be used as an argument for no action or too little action to reduce carbon emissions of such buildings; • Adaptation to the works or the historic fabric should primarily use traditional materials; • Traditional methods/materials may not be the most appropriate or sustainable ways of enhancing the performance of historic buildings. • English Heritage have commented that it is reasonable to include a future policy on this matter; they also note that Supplementary Planning Guidance on this issue might be sufficient, and would be beneficial in providing more detailed advice
NEW OPTIONS ARISING FOLLOWING COMMUNITY INVOLVEMENT	
No additional options have been suggested.	

Evidence base:

- Part L of the Building Regulations;
- Adapted from CIBSE (2002) Guide to building services for historic buildings. Sustainable services for traditional buildings;
- English Heritage (2011). Energy efficiency and historic buildings. Application of Part L of the Building Regulations to historic and traditionally constructed buildings.

How the policy came about:

74. The “weighting” of benefit or harm to a heritage asset in respect of works to address climate change is partly clarified by the National Planning Policy Framework. Paragraph 132 states: “When considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset’s conservation. The more important the asset, the greater the weight should be”. In effect, this is a sliding scale of importance, and each individual case would be considered on its merits.
75. As background to this subject in England, English Heritage has also provided guidance on the application of Part L of the Building Regulations (Conservation of Fuel and Power) titled “Energy Efficiency and Historic Buildings – Application of Part L of the Building Regulations to historic and traditionally constructed buildings”. It should be noted that the requirements in Part L do not apply to Grade I, Grade II* or Grade II buildings, buildings in conservation areas, or to scheduled ancient monuments. However in the event that works to improve energy efficiency are proposed to an historic building, there are key considerations that must be taken into account in terms of materials, technologies, building fabric, assessment and impact on building character. English Heritage’s guidance is a useful reference of best practice for

undertaking such works. The purpose of such guidance is to help prevent conflicts between energy efficiency requirements and the conservation of historic and traditionally constructed buildings. Preventing such conflict lies at the heart of this option and any future national policy that might be forthcoming.

76. The council seeks to secure the highest possible standards of sustainability in all buildings, including the promotion of increased energy efficiency, renewable energy generation and climate change adaptation in the city's existing building stock. The council supports efforts to improve the energy performance of the building stock of the city and to better adapt buildings to our changing climate. However, care needs to be taken to ensure that works to heritage assets do not compromise their special character or significance. Owners of listed buildings should also ensure that there is minimal intervention in a historic building's fabric and that the works are reversible and do not harm the building's historic integrity. The Cambridge Local Plan 2006 provides no coverage on this issue as it has only recently been recognised as a matter of concern. As a result of the changing approach to addressing climate change, it was considered appropriate to include Option 70 Works to a heritage asset to address climate change within the council's Issues and Options report in 2012.
77. Representations on this option raised no objection in principle towards pursuing a policy. The subject of works to a heritage asset to address climate change is a relatively new challenge, in some cases linked to owners of listed buildings being subject to the requirements of the Carbon Reduction Commitment, for example the University of Cambridge and its colleges. There is a growing body of research and literature to help guide those involved in both promoting and assessing works to such buildings. English Heritage, Historic Scotland and the Society for the Protection of Ancient Buildings have recently published findings and guidance, for example on matters such as fabric improvements for energy efficiency, a key issue in relation to historic buildings.
78. Some representations felt that there was no need for a policy on this matter, and that the issue of climate change and the historic environment could be dealt with through a Supplementary Planning Document. However, the National Planning Policy Framework is clear that local planning authorities should set out a "positive strategy" for conservation of the historic environment. A key part of such a strategy should be a clear planning policy on this subject. It is also considered that given the presence of a significant number of guidance notes from bodies such as English Heritage and Sustainable Traditional Buildings Alliance, further guidance in the form of a Supplementary Planning Document would be unnecessary. The supporting text of the policy could provide references to some of these guidance notes.

79. When carrying out works to a heritage asset to improve its environmental performance, it is important that the energy hierarchy is adopted. Prior to looking at alternative means of generating energy, it is important that all possible means of conserving energy are investigated and put into practice. Any works should be on the basis of a thorough understanding of how the building performs as a structure and how it is used. This analysis and understanding of the building must include the conservation and sustainability constraints and opportunities as well as an understanding of baseline energy consumption. Works to historic fabric generally should use materials that either match the original building materials or are sympathetic to them. In the event that modern materials and methods are proposed, it is important to carefully assess how well they will fit with the existing materials and methods of construction in order to reach a balanced judgement of what method is more appropriate.
80. When considering the installation of renewable technologies, the viability of a range of technologies should be assessed in order to ensure that the correct technology is specified. Consideration must be given to the significance of the designated heritage asset, as this may rule out the use of certain technologies. In some cases, it may be possible to connect buildings to existing renewable or low carbon energy infrastructure, for example district heating networks. The specification of microgeneration technologies such as photovoltaic panels is also becoming increasingly popular. There are a number of key questions that must be asked when considering the installation of renewable energy technologies in the historic environment, including:
- Has the proposal been designed sensitively to fit with the appearance of the existing building?
 - Will it harm the character or appearance of the building or conservation area?
 - Will it be visible from the public realm?
 - In the case of a listed building, will the proposed installation harm the historic fabric of the building and are the works reversible?
81. Given the need to balance the importance of protecting heritage assets and responding to the challenges of climate change, it is considered that a policy with specific criteria to act as a guide for proposals would assist the council and applicants in getting that balance right.

Findings of the Sustainability Appraisal of the Cambridge Local Plan (July 2013)

82. The findings of the Sustainability Appraisal of the draft Cambridge Local Plan were that overall the plan would lead to significant positive effects in terms of the following SA objectives:

- Be of the highest quality, in terms of design excellence and innovation, addressing its impact upon its surroundings and embracing the principles of sustainable design and construction.
 - Contribute to the positive management of change in the historic environment, protecting, enhancing and maintaining the unique qualities and character of Cambridge, including the River Cam corridor, the city’s wider landscape and setting, and its designated and undesignated heritage assets for the future.
83. The appraisal noted that the plan would allow (in principle) works to a heritage asset in order to address climate change, which should help protect against risks that climate change may bring.

Key Issues raised during Proposed Submission consultation

Policy 63: Works to a heritage asset to address climate change	
Total Representations: 10	
Object: 5	Support: 5
Objections	<ul style="list-style-type: none"> • Policy and associated text should be reworded to ensure proportionality between information requirements and the nature and extent of the proposed work and therefore compliance with the NPPF; • Policy needs to take more account of significance of heritage asset in a proportionate manner; • Policy is overly onerous and could act as a disincentive to action; • Monitoring should only be necessary in exceptional circumstances and this needs to be clarified; • Principles of Heritage Partnership Agreements should be extended to locally listed buildings;
Support	<ul style="list-style-type: none"> • Support for the commitment to tackling climate change and reducing carbon emissions; • Support for the use of the energy hierarchy in assessing works to a heritage asset; • Support for the reuse of older buildings to retain embodied energy and enhance their environmental performance.

Minor Modifications suggested following Proposed Submission consultation and implications for Sustainability Appraisal

84. As a result of assessment, three minor modifications are suggested for Policy 63 Works to Heritage Assets to address Climate Change and paragraphs 7.30 and 7.31 of the supporting text. These changes are in the Addendum to the Cambridge Local Plan 2014: Proposed Submission document marked as PM/7/007, PM/7/008 and PM/7/009.

85. The first of these changes (PM/7/007) is suggested following on from representations received from English Heritage (27540) and the Bursars' Committee (28044). Additional wording has been included within the policy to ensure that a building's historic development, architectural features and performance are considered appropriately in determining what works would be appropriate to a heritage asset, and that monitoring is proportionate to the significance of the asset in question, as follows:

"Proposals to enhance the environmental performance of heritage assets will be supported where a sensitive and hierarchical approach to design and specification ensures that the significance of the asset is not compromised by inappropriate interventions.

Any works should be undertaken based on a thorough understanding of the building's historic evolution, its construction, architectural and historic significance, and demonstration of the building's environmental performance. Applications should be accompanied by an assessment of the building's current fabric and energy performance. For ~~major~~ relevant planning applications, details of post-construction monitoring in the form of a building monitoring and management strategy will be required to be submitted in order to assess the ongoing impact of the implemented measures on the asset's historic fabric. Monitoring requirements will be proportionate to the significance of the asset and the scale and scope of works undertaken. Where monitoring shows that interventions are causing harm to the significance of the asset, appropriate remediation works will be required."

86. In response to a representation (representation number 27219) proposed modification PM/7/008 proposes to reword paragraph 7.30 in order that a building's historic development, architectural features and performance as considered appropriately and that works undertaken do not impact detrimentally on the significance of the asset in question. The proposed rewording is as follows:

"Due to the nature of construction of historic buildings, it would be difficult to match the performance of modern structures. However, vernacular design and traditional construction have evolved over time and deal with local conditions. Adaptive re-use of a building gives significant carbon savings in terms of embodied energy in the fabric of the building, so the focus will be on enhancing the performance of traditional buildings as much as practicable without damaging their significance. ~~Minimal intervention will be required, along with assurance that the works do not harm the building's integrity or significance.~~ Acceptable levels of intervention will vary dependent upon the impact on the significance of the heritage asset in question. Works should not harm the building's integrity or significance."

87. The final proposed modification (PM/7/009) is in response to a representation (representation number 27219). In order to provide clarity in relation to the types of applications received related to heritage assets, the following rewording of the first sentence of paragraph 7.31 is suggested:

““Applications for works to heritage assets will need to ~~Planning applications will need to~~ demonstrate a thorough understanding of the building in question via the submission of the following information:”

88. Following consideration of the impact of these changes on the Sustainability Appraisal Framework, it has been concluded that these changes do not materially alter the findings of the Sustainability Appraisal.

Policy 64: Shopfronts, Signage and Shop Security Measures

EXISTING POLICY TO BE REPLACED (CAMBRIDGE LOCAL PLAN 2006)	OPTION(S) BEING TAKEN FORWARD FROM THE ISSUES AND OPTIONS REPORT (2012) AND ISSUES AND OPTIONS 2 (2013)	OPTION(S) NOT BEING TAKEN FORWARD FROM THE ISSUES AND OPTIONS REPORT (2012)
<ul style="list-style-type: none"> 3/15 Shopfronts and signage 	<ul style="list-style-type: none"> Option 71 Shopfronts and signage policy 	<ul style="list-style-type: none"> Not applicable

Key issues raised during Issues and Options (2012) and Issues and Options 2 (2013) consultations:

SECTION OF THE ISSUES AND OPTIONS REPORT (2012)	KEY ISSUES ARISING FROM CONSULTATION
<p>Option 71: Shopfronts and signage policy</p> <p>The purpose of this option is to ensure the protection of existing shopfronts when alterations are proposed and to ensure new signage is appropriate when proposed as part of a shopfront</p>	<ul style="list-style-type: none"> Shopfronts and signage should be required to be sympathetic and positive in relation to the character of the building; There still needs to be much work done with corporate brands like phone shops for example; Some shops require shutters or bollards to deter robbers; A policy allied to a review of the Shopfront Design Guide would be appropriate; There is no need for a Local Plan policy on shop fronts and guidance. Advice on these and other ‘advertisement’ issues could be provided in Supplementary Planning Document guidance; Commercial development in the historic city centre must be controlled in order to maintain a sense of place; Support aligned to a policy supporting small units and diversity of use types;

	<ul style="list-style-type: none"> • Current policy seems to be sufficient; • There should be a presumption against chains using their house style and an effort made to harmonise shop fronts in the City Centre (e.g. convenience stores or fast-food outlets); • Remove shutters from premises that have them and don't permit new ones; • The use of advertising billboards on busy pavements should be stopped.
NEW OPTIONS ARISING FOLLOWING COMMUNITY INVOLVEMENT	
No additional options have been suggested.	

Evidence base:

- Cambridge City Council (2006) Historic Core Area Appraisal;
- Cambridge City Council, Conservation Area Appraisals (various dates).

How the policy came about:

89. Paragraph 64 of the National Planning Policy Framework states that planning permission should be refused for development of poor design that fails to take the opportunities available for improving the character and quality of an area and the way it functions. Additionally, paragraph 67 of the National Planning Policy Framework asserts that “Poorly placed advertisements can have a negative impact on the appearance of the built and natural environment. Control over outdoor advertisements should be efficient, effective and simple in concept and operation. Only those advertisements which will clearly have an appreciable impact on a building or on their surroundings should be subject to the local planning authority’s detailed assessment. Advertisements should be subject to control only in the interests of amenity and public safety, taking account of cumulative impacts.” Furthermore, the National Planning Policy Framework at paragraph 58 (second bullet point) sets out the requirement for planning policies and decisions to “establish a strong sense of place, using streetscapes and buildings to create attractive...places to live, work and visit”, whilst the fourth bullet point of the same paragraph indicates that policies and decisions should aim to ensure that developments “respond to local character and history...”
90. Shopfronts and signage form a major part of the streetscape of Cambridge. They can contribute to the character and quality of the city and play an important part in defining distinct and attractive shopping areas. Policy 3/15 Shopfronts and Signage in the Cambridge Local Plan 2006 sets out the council’s expectations that shopfronts and signage in Cambridge will be of a high quality and will be in keeping with their context. A high quality example of a new shopfront in the city centre is the Jack Wills shop at No. 18 Sidney Street. Significant consideration has been given to the glazing proportions and overall effect of the curved shopfront for that particular building within its setting.

91. When approval of new signage is required, the council works closely with corporate brands to ensure a proposed sign (whether a fascia sign or otherwise on a shopfront) is sympathetic to its location. There are examples in and around the city centre of such signage being customised to suit its particular location, including McDonalds on Rose Crescent.
92. Option 71 on shopfronts and signage within the Issues and Options report (2012) and its related representations were considered at Development Plan Scrutiny Sub Committee in December 2012. It was considered appropriate to pursue the policy approach set out within this option, which would have wider benefits in terms of maintaining a high quality environment. In addition to addressing issues on shopfronts and signage, the policy will also address the need for shutters and other security measures.
93. Some shops require shutters or bollards to deter theft, dependent on the type of merchandise sold in the shop. Usually, the greater the value of the merchandise, the greater the likelihood of the owner using shutters or bollards. Applications for shutters and bollards will be considered on a case by case basis using this policy approach, which may incorporate some details from the council's Shopfront Design Guide.

Findings of the Sustainability Appraisal of the Cambridge Local Plan (July 2013)

94. No adverse impacts from this Policy on the sustainability objectives were predicted as part of the Sustainability Appraisal process.

Key Issues raised during Proposed Submission consultation

Policy 64: Shopfronts, signage and shop security measures	
Total Representations: 2	
Object: 0	Support: 2
Objections	Not applicable
Support	<ul style="list-style-type: none"> • Supported to improve the environment.

Minor Modifications suggested following Proposed Submission consultation and implications for Sustainability Appraisal

95. No changes to Policy 64 Shopfronts, signage and shop security measures or the supporting text are suggested in the Addendum to the Cambridge Local Plan 2014: Proposed Submission document. There are therefore no impacts on the findings of the Sustainability Appraisal.

Policy 65: Visual Pollution

EXISTING POLICY TO BE REPLACED (CAMBRIDGE LOCAL PLAN 2006)	OPTION(S) BEING TAKEN FORWARD FROM THE ISSUES AND OPTIONS REPORT (2012) AND ISSUES AND OPTIONS 2 (2013)	OPTION(S) NOT BEING TAKEN FORWARD FROM THE ISSUES AND OPTIONS REPORT (2012)
<ul style="list-style-type: none"> Not applicable 	<ul style="list-style-type: none"> Option 89 Detailed visual pollution policy 	<ul style="list-style-type: none"> Not applicable

Key issues raised during Issues and Options (2012) and Issues and Options 2 (2013) consultations:

SECTION OF THE ISSUES AND OPTIONS REPORT (2012)	KEY ISSUES ARISING FROM CONSULTATION
Option 89 - Detailed Visual Pollution Policy	<ul style="list-style-type: none"> Street clutter is a persistent problem; No need for a separate policy, other policies in the plan allow these matters to be addressed; The design of buildings can involve visual pollution; Require commercial premises use lower lighting when shut; Include mobile phone masts in the third bullet point.
NEW OPTIONS ARISING FOLLOWING COMMUNITY INVOLVEMENT	
No additional options have been suggested.	

Evidence base:

- Cambridge City Council (various dates). Conservation Area Appraisals;
- Cambridge City Council (2006). Cambridge Historic Core Appraisal.

How the policy came about:

96. The National Planning Policy Framework recognises the importance of streetscapes in creating attractive and comfortable places to live, work and visit. It also recognises that poorly placed advertisements can have a negative impact on the appearance of the built and natural environment. Given the international importance of Cambridge's historic environment, it is considered that a policy approach that seeks to reduce the impact of street and building clutter is appropriate for the new Local Plan. Such an approach received strong support during consultation on the Issues and Options Report (2012) where it was recognised that street and building clutter in the form of advertising and signage, unnecessary street furniture and satellite dishes is a persistent issue within the townscape of the city. There was some support for telecommunications infrastructure being included within the policy. However,

it is considered that in those instances where planning permission is required for telecommunications development, these would be better dealt with via a specific telecommunications policy in the local plan.

97. The Sustainability Appraisal of the Issues and Options Report (2012) noted that such a policy had the potential to contribute positively to maintaining and improving the quality of the city centre as a place to live, work and spend leisure time. Not only would it help maintain Cambridge as an attractive tourist destination and contribute to promoting an attractive public realm but it would also help contribute to maintaining the attractiveness of Cambridge’s townscape, particularly in conservation areas by promoting their individual character and distinctiveness. This option may contribute positively to helping improve the quality of public realm in various areas of the city.

Findings of the Sustainability Appraisal of the Cambridge Local Plan (July 2013)

98. No adverse impacts from this Policy on the sustainability objectives were predicted as part of the Sustainability Appraisal process.

Key Issues raised during Proposed Submission consultation

Policy 65: Visual Pollution	
Total Representations: 3	
Object: 2	
Support: 1	
Objections	<ul style="list-style-type: none"> The wording of Policy 65, criterion (a) is considered overly restrictive on telecommunications development. To ensure policy consistency with NPPF, the reference to telecommunications cabinets should be removed from Policy 65 and included within Policy 84 of the Local Plan, or a minor amendment to criterion (a) of Policy 65 as follows "they do not have an unacceptable adverse impact on the character and setting of the area and its visual amenity"; The commons should be protected from visual pollution.
Support	<ul style="list-style-type: none"> Support for policy.

Minor Modifications suggested following Proposed Submission consultation and implications for Sustainability Appraisal

99. No changes to Policy 65 Visual pollution or the supporting text are suggested in the Addendum to the Cambridge Local Plan 2014: Proposed Submission document. There are therefore no impacts on the findings of the Sustainability Appraisal.

Policy 66: Paving over front gardens

EXISTING POLICY TO BE REPLACED (CAMBRIDGE LOCAL PLAN 2006)	OPTION(S) BEING TAKEN FORWARD FROM THE ISSUES AND OPTIONS REPORT (2012) AND ISSUES AND OPTIONS 2 (2013)	OPTION(S) NOT BEING TAKEN FORWARD FROM THE ISSUES AND OPTIONS REPORT (2012)
<ul style="list-style-type: none"> • Not applicable 	<ul style="list-style-type: none"> • Option 76 Paving over front gardens 	<ul style="list-style-type: none"> • Not applicable

Key issues raised during Issues and Options (2012) and Issues and Options 2 (2013) consultations:

SECTION OF THE ISSUES AND OPTIONS REPORT (2012)	KEY ISSUES ARISING FROM CONSULTATION
Option 76 – Paving over front gardens	<ul style="list-style-type: none"> • Simply require paved over gardens to have adequate soakaways for their drainage systems; • Ideally soft paving should always be used; • This will continue to increase our capacity to reduce flood risk; • All developments, not just front gardens should increase porosity by use of adequate materials and soakaways; • Support clear guidance on the factors that need to be considered when contemplating paving over front gardens, including the impact of the character of the area and surface water runoff; • Support for a policy because of the negative visual impact of paving over front gardens; • The removal of walls in conservation areas to facilitate extra parking is something that should be resisted; • Silly to go for green roofs if we are concreting front gardens; • With stringent restrictions on parking in the city, there should not be any restrictions on people parking in front of their houses; • Given that this is often permitted development, the policy is unnecessary. If it is a concern in conservation areas, it should be flagged up in Conservation Area Management Plans; • There needs to be clear control on this and potentially rear gardens as well.
NEW OPTIONS ARISING FOLLOWING COMMUNITY INVOLVEMENT	
No additional options have been suggested.	

Evidence base:

- Cambridgeshire Flood Risk Management Partnership (2011). The Surface Water Management Plan for Cambridge;
- Committee on Climate Change – Adaptation Sub-Committee (2012). [Climate Change – is the UK preparing for flooding and water scarcity?](#);
- Department of Communities and Local Government (2008). [Guidance on the permeable surfacing of front gardens.](#)

How the policy came about:

100. In 2007, flooding in urban areas caused widespread disruption, damaged infrastructure and in a number of cases lead to loss of life. In many cases, flooding occurred because drains could not cope with the amount of rainwater flowing into them. The loss of porous surfaces and vegetation in urban areas have been identified as significant factors in creating higher levels of surface water runoff in urban areas, which contribute to localised flooding. The paving over of front gardens can also lead to the loss of the domestic character of residential areas and streets.

101. The National Planning Policy Framework sets out a requirement for local planning authorities to ensure that flood risk is not increased elsewhere when determining planning applications (paragraph 103). Cambridge has issues with both surface water (pluvial) and river (fluvial) flood risk throughout Cambridge. The Surface Water Management Plan for Cambridge (2011) shows that the majority of Cambridge is at high risk of surface water flooding. Development, if not undertaken with due consideration of the risk to the development and the existing built environment, will further increase this flood risk. Where possible, the council is addressing the risk of surface water flooding by requiring new developments to limit discharge of surface water and designing in more effective rainwater management measures. Additionally, the council is actively addressing surface water flooding by designing open spaces to accommodate surface water, where necessary. However, the collective impact of impermeable hard surfacing on front gardens should not be underestimated. The Government's Committee on Climate Change – Adaptation Sub-Committee reported in July 2012 that indicators show that in towns and cities the proportion of gardens that have been paved over increased from 28% of total garden area in 2001 to 48% in 2011. An increase in impermeable surfaces in urban areas also increases the risk of pollution as surface water picks up oil, petrol and other surface contaminants. When the sewer system cannot cope with the volume of runoff, it is discharged along with pollutants and surface contaminants into local rivers and other watercourses, causing pollution. The interim Sustainability Appraisal of the Issues and Options Report (2012) noted that the addition of visual amenity and biodiversity related criteria to the consideration of paving proposals is likely to have a positive effect. There was a high level of support

for such a policy during the Issues and Options consultation. While some respondents felt that the provision of driveways would help free up space for on-street parking, the creation of cross-over spaces for driveways actually reduce the amount of on-street parking possible, and changes the character of the area.

102. Under permitted development legislation, specific limits apply for householders wishing to introduce hard surfacing on their front gardens. The same restrictions do not apply to back gardens. Planning permission is not required if the new or replacement driveway of any size uses permeable materials, such as gravel, which would allow water to drain through the surface, or where rainwater is directed into a lawn or border to drain. If the size of the area of hard surfacing exceeds five square metres and the surfacing to be used is impermeable and no provision is made for rainwater to soak away naturally, planning permission would be required.
103. Whilst it is recognised that there is a range of materials available to allow householders to use permeable materials for driveways, it is difficult to enforce this matter. Furthermore, the creation of hard surfaced areas for parking has a negative visual impact in itself and can also give rise to the loss of walls and other features, which may have contributed positively to the domestic character and appearance of an area. Front gardens can also provide important habitats, and their loss to hard surfacing can also have a negative impact on biodiversity. In the interests of mitigating surface water flood risk across the city and in maintaining the character and appearance of the townscape, particularly in conservation areas, and protection of biodiversity, it is considered that this policy approach would require greater consideration and weight to be given to the potential impacts of and mitigation against this form of development. This matter can also be raised in Conservation Area Character Appraisals and Management Plans as an area of concern, but the policy would allow the council greater opportunity to address the issues at hand.

Findings of the Sustainability Appraisal of the Cambridge Local Plan (July 2013)

104. No adverse impacts from this Policy on the sustainability objectives were predicted as part of the Sustainability Appraisal process.

Key Issues raised during Proposed Submission Consultation

Policy 66: Paving over front gardens	
Total Representations: 4	
Object: 1	Support: 3
Objections	<ul style="list-style-type: none"> There should be an additional criterion to read “where paving over will not encourage private car use by creating spaces where existing on-road spaces exist already.”
Support	<ul style="list-style-type: none"> Support for policy to maintain amenity and environment.

Minor Modifications suggested following Proposed Submission consultation and implications for Sustainability Appraisal

105. No changes to Policy 66: Paving over Front Gardens or the supporting text are suggested in the Addendum to the Cambridge Local Plan 2014: Proposed Submission document. There are therefore no impacts on the findings of the Sustainability Appraisal.

Policy 67: Protection of Open Space

EXISTING POLICY TO BE REPLACED (CAMBRIDGE LOCAL PLAN 2006)	OPTION(S) BEING TAKEN FORWARD FROM THE ISSUES AND OPTIONS REPORT (2012) AND ISSUES AND OPTIONS 2 (2013)	OPTION(S) NOT BEING TAKEN FORWARD FROM THE ISSUES AND OPTIONS REPORT (2012)
<ul style="list-style-type: none"> 4/2 Protection of Open Space 	<ul style="list-style-type: none"> Option 164 Protection of Open Space 	<ul style="list-style-type: none"> Not applicable

Key issues raised during Issues and Options (2012) and Issues and Options 2 (2013) consultations:

SECTION OF THE ISSUES AND OPTIONS REPORT (2012)	KEY ISSUES ARISING FROM CONSULTATION
Option 164: Protection of open space	<ul style="list-style-type: none"> Support for much tighter criteria regarding the satisfactory replacement of existing areas (including direct and indirect benefits); Resist loss of open space; Open spaces form part of the historic character of Cambridge and should be protected accordingly; Much stronger policy is needed to prevent loss of open spaces under current Local Plan;

	<ul style="list-style-type: none"> • Need to continue with current policy protection and protect green lungs within the city and the urban edge (e.g. playing fields); • Overly restrictive policy that prevents development which respects environmental quality; • Potential of expansion of local schools provides an opportunity to enhance the quantity of provision; • Remove reference to Green Belt as this is not open to the public and is already protected as a separate designation; • Policy fails to weigh up the public benefit against the loss of public open space; • Lack of up-to-date evidence supporting existing open space policy; • Allowing protected open space for recreational reasons only to be replaced elsewhere should not be permitted. Where is elsewhere?
NEW OPTIONS ARISING FOLLOWING COMMUNITY INVOLVEMENT	
No additional options have been suggested.	

SECTION OF THE ISSUES AND OPTIONS 2 REPORT (2013)	KEY ISSUES ARISING FROM CONSULTATION
Protected Open Spaces (paragraphs L.16-L.20)	<ul style="list-style-type: none"> • Over restrictive regulation will prevent colleges from providing student accommodation with easy access to the University and colleges • Adequate policies in the Local Plan without further designations • To designation of Principal's Garden at Ridley Hall as protected open space • Restore open space at Howard Mallett Club • Protect open space taking into account current and <i>future</i> requirements • State what is meant by suitable location for replacement site

	<ul style="list-style-type: none"> • Support retention of policies protecting open space • Recreation may be able to be relocated, but not environmental value • Should be increasing green space • Need wild areas to support biodiversity • Recreation may be able to be relocated, but not environmental value • Address deficiencies in certain areas of Cambridge • Essential that housing growth avoids loss of recreation and open space • More open space needed • Support retention of open space • Recreation may be able to be relocated, but not environmental value
<p>Local Green Spaces (paragraphs L.21-L.22)</p>	<ul style="list-style-type: none"> • The following open space designations were contested: <ul style="list-style-type: none"> ○ Principal’s Garden at Ridley Hall (Site No. P&G37) ○ Spinney – Blue Circle (Site No. NAT11) ○ Lakes adjacent to Cherry Hinton Brook (Site No. NAT28) ○ Gardens at Lucy Cavendish College (Site No. P&G42) • The restoration of open space at Howard Mallett Club was also requested. • The following sites should not have their protected open space designation downgraded for residential development: <ul style="list-style-type: none"> ○ Wilberforce Road Meadow Triangle (Site No. NAT19) ○ Emmanuel Playing field (Site No. SPO16) ○ Tennis Club /Hockey field (Site No. SPO06) ○ Trinity College Playing Field (Site No. SPO51) • Former landfill west of Norman Way (Site No. NAT 38) should be developed for housing instead of Green Belt • Field south corner of Coldham’s Common should be developed for housing instead of Green Belt • Enhance and strengthen the wildlife corridor running Wandlebury – East Pit – Lime Kiln Hill Nature Reserve – Cherry Hinton Hall – Cherry Hinton Brook – Coldham’s Common – River Cam
	<ul style="list-style-type: none"> • Numerous sites were proposed for Local Green Space designation • Trumpington Residents Association does not consider any more designations necessary

Evidence base:

- The Cambridgeshire Together Board. Cambridgeshire Vision: County-wide Sustainable Community Strategy 2007–2021;

- Cambridge City Council (2007). Cambridge Sustainable Community Strategy (2007);
- Cambridge City Council (2008). Cambridge Climate Change Strategy and Action Plan 2008-2012;
- Cambridgeshire Horizons (2008). The Cambridgeshire Quality Charter for Growth;
- Natural England (2009). Green Infrastructure Guidance;
- Cambridge City Council (2009). Cambridge Sports Strategy 2009 – 2013;
- Department for Environment Food and Rural Affairs (2011). The Natural Choice: securing the value of nature;
- Cambridgeshire Horizons (2011). Green Infrastructure Strategy for Cambridgeshire;
- Cambridge City Council (2011). Open Space and Recreation Strategy.

How the policy came about:

106. Open spaces, regardless of ownership, are a key aspect of high quality urban environments and are fundamental to the character of the city. In addition to having an important role to play in the streetscape, these areas provide people with a place to relax and socialise as well as encouraging healthier lifestyles by providing opportunities for sport and informal play. They also provide important opportunities to support a wide range of citywide strategies, including biodiversity, climate change, green infrastructure, surface water management and flood risk prevention.
107. The National Planning Policy Framework recognises the important contribution that access to high quality open spaces and opportunities for sport and recreation makes to the health and well-being of communities. Paragraph 74 of the National Planning Policy Framework states that existing open space, sports and recreational buildings and land, including playing fields, should not be built on unless:
- an assessment has been undertaken which has clearly shown the open space, buildings or land to be surplus to requirements; or
 - the loss resulting from the proposed development would be replaced by equivalent or better provision in terms of quantity and quality in a suitable location; or
 - the development is for alternative sports and recreational provision, the needs for which clearly outweigh the loss.
108. The National Planning Policy Framework goes on to state that planning policies should be based on robust and up to date assessments of the needs for open space, sport and recreation facilities and opportunities for new provision. Such an assessment should identify specific needs and quantitative or qualitative deficits or surpluses of open space, sports and recreational facilities in the local area. The council's Open Space and Recreation Strategy (2011) was completed to help inform the development of open space related policies and local

strategies. This approach is in keeping with the requirements of the National Planning Policy Framework.

109. It is important that the current approach of protecting open spaces remains because these sites can help support various city-wide strategies related to flood risk management, climate change, health and well-being, sustainable transport, biodiversity and green infrastructure. Paragraph 93 of the National Planning Policy Framework promotes measures to counter the impacts of climate change while paragraph 114 states that Local Planning Authorities should plan “positively for the creation, protection, enhancement and management of networks of biodiversity and green infrastructure.”
110. The loss of open space will continue to be resisted given the multi-functional role these areas currently perform and/or could perform in the future. The Sustainability Appraisal supports the continued protection of open spaces because open spaces are a key issue for Cambridge, given the positive effect these areas have on the character of Cambridge.
111. The current Local Plan policy (Policy 4/2) protects designated open spaces for their recreational and, or environmental value as well as undesignated areas that satisfy the assessment criteria for either recreational or environmental, including areas in the Green Belt. This policy approach will be taken forward in the new Local Plan policy. Sitting alongside Policy 67 the designations schedule (Issues and Options 2 Report, 2013, Annex L3.1: Protected Open Spaces) sets out all of the open spaces currently designated as protected open space.
112. The existing approach will be enhanced with stronger criteria relating to the satisfactory replacement of existing recreational open spaces. This will take the form of much clearer guidance as to what is regarded as satisfactory. For example, in terms of accessibility, the distance of the replacement open space needs to be within walking distance of the original site, unless it can be proved that a more accessible site is proposed. Accessibility will not just be measured in terms of distance but also the availability of the site to the general public. The council’s Open Space and Recreation Strategy and its successor documents should be used to guide the planning process regarding the loss of any open space.
113. Open spaces of environmental importance including those that contribute to the character and setting of Cambridge will continue to be protected. New developments that have the potential to affect an environmentally sensitive area of open space will need to provide satisfactory justification that the area’s environmental qualities are not adversely affected.
114. The definition of open space will not normally include Green Belt as this is protected under a separate designation (National Planning Policy Framework, Chapter 9 Protecting Green Belt Land, particularly paragraph 87 and 88). Paragraph 89 explains the special circumstances when development in the

Green Belt is acceptable. However, the new Local Plan policy to protect areas of open spaces will apply to areas of the Green Belt where these satisfy the assessment criteria for either recreational or environmental protection, e.g. sports pitches.

115. Details of the circumstances where the public benefit of new development outweigh the loss of protected open space will also be outlined. These details should be flexible enough to respond to the priorities of each ward. In particular, where deficiencies of open space have already been identified as a local issue, the loss of any open space will be resisted. unless it can be replaced in a suitably accessible location in the same ward or an alternative location with under provision that is acceptable to the local community where the loss occurs.
116. With regards to the status of school playing fields, section 77 of the School Standards and Framework Act 1998 (playing fields), as amended by the Education Act 2011, requires an application for disposal or change of use of playing fields to be made to the Secretary of State who may instead direct that the land should be transferred to an academy. Academy Trusts wishing to dispose of land for which they hold the freehold are required under the terms of their funding agreement, and under the Academies Act 2010, to seek the consent of the Secretary of State before making any disposal. Protection of playing fields was further enhanced in 1998 with Circular 9/98 (replaced in 2009 by Circular 02/09) which stipulates that where a local authority is minded to grant planning permission against Sport England's advice on land owned by a local authority or used for educational purposes, then the application should be referred to the National Planning Casework Unit who are responsible for handling referrals to the Secretary of State for Communities and Local Government for possible 'call in'. This referral is in accordance with the Town Planning (Consultation) (England) Direction 2009 and the DCLG letters of 10 March 2011 and 10 Feb 2012.
117. While the loss of a playing field is a rare occurrence it is not clear that the current legislation covering playing fields is applicable to other play areas. The expansion of local schools should enhance both the quality and quantity of open space provision, rather than leading to a net loss. School play areas will therefore continue to be protected to ensure incremental alterations to school premises to not lead to a reduction in school play provision.
118. Sport England has been a Statutory Consultee on planning applications that affect playing fields since 1996 (Statutory Instrument 1817, as amended by Statutory Instrument 2010/2184) due to concern over the loss of playing fields. This means that any planning application that affects a playing field has to be referred to Sport England for comment by the local authority.
119. Sport England have also been consulted on the development of Policy 68, and a number of amendments have been made to this policy as a result of their

comments, specifically in relation to the protection of playing fields and sports facilities where educational development is proposed on school, college and University grounds. Such development can directly conflict with Sport England policy if it results in the loss of a playing field and the development is for an educational rather than sporting facility. As such the policy now includes the following:

“In the case of school, college and university grounds, development may be permitted where it meets a demonstrable educational need and does not adversely affect playing field provision on the site”.

120. Such an approach allows for the potential for new educational buildings on parts of the site that are not in playing field use and could not readily be used as such (e.g., small areas of amenity grassland separated from the main playing field). This can be justified on the grounds that playing fields/sports facilities have separate policy advice within National Planning Policy Framework (Paragraphs 73-74) as well as statutory protection with regards to Sport England consultee status and policy.
121. The Interim Sustainability Appraisal (2012) states that protecting Cambridge’s network of open spaces is likely to contribute positively towards the majority of the sustainability topics. In particular, maintaining access to high quality green and open spaces has been identified as a key issue across all of Cambridge. Protecting open space and limiting development that could harm the character of open spaces should help increase the amenity and attractiveness of these areas as places for recreation. This option should also help encourage greater uptake of walking/cycling as a means of transport, which will have wider health benefits.
122. During the Issues and Options 2 (2013) consultation, there was opposition to over restrictive regulation that prevents colleges from providing student accommodation with easy access to the University and colleges. It was considered that there was already adequate policy protection in the Local Plan without further designations. Any protected open space should take account of both current and future requirements. Further clarification was also required for what is meant by suitable location for replacement site.
123. The designation of the Principal’s Garden at Ridley Hall (Site No. P&G37), Spinney – Blue Circle (Site No. NAT11), Lakes adjacent to Cherry Hinton Brook (Site No. NAT28) and gardens at Lucy Cavendish College (Site No. P&G42) as protected open spaces were contested. The restoration of open space at Howard Mallett Club was also requested.
124. There was also support for important open space spaces to be protected. It was argued that while it might be possible to relocate recreational facilities provided by open spaces, this was not the case with spaces of environmental value. The amount of green space should be increased including wild areas to support biodiversity. Deficiencies in open spaces in certain areas of Cambridge

should be addressed. It is also essential that housing growth avoids loss of recreation and open spaces. The following sites Wilberforce Road Meadow Triangle U4/NAT19, Emmanuel Playing field R25/SPO16, Tennis Club /Hockey field SPO06/R25 and Trinity College Playing Field SPO51 should not have their protected open space designation downgraded for residential development.

125. In summary, there is a need to increase and protect open spaces of both amenity and recreational value. Some degree of flexibility for educational, college and universities grounds may also be necessary to meet an educational need without any loss of playing fields.
126. Future policies will protect trees, sites of local nature conservation importance and priority species and habitats as well as encouraging developments to support biodiversity. Opportunities for promoting biodiversity will come forward in the new draft Local Plan through: Policy 57: Designing New Buildings; Policy 59: Designing Landscape and the Public Realm; Policy 67: Protection of open space; Policy 69: Protection of sites of local nature conservation importance and Policy 70: Protection of Priority Species and Habitats.
127. An additional 51 open space sites were proposed for protection and were assessed. All of these were assessed according to the criteria in existing Local Plan (and the same as that in the draft Local Plan). Out of the 51 sites, 26 were considered to be of a suitable quality to be designated for protection.
128. Paragraph 76 of the National Planning Policy Framework allows for the special protection of green areas of particular importance to local communities, with the introduction of the Local Green Space designation. As part of the Issues and Options 2 consultation, the question of whether there were any areas that met the criteria for Local Green Space designation was asked. During the consultation North Newnham Residents' Association, Old Chesterton Residents' Association and private individuals proposed 17 separate sites for Local Green Space designation. For each proposed Local Green Space site, further information was requested to explain how each site met the Local Green Space criteria listed in the National Planning Policy Framework. This information was noted and will be kept on record.
129. The proposed sites included existing natural green spaces, sports playing fields and other forms of recreational areas, including part of a public house garden many of which were already designated areas of protected open spaces. The public house garden area forms part of a proposed safeguarded public house site, under Policy 76: Protection of Public Houses. The remaining sites were initially assessed as part of the additional 51 open space sites (discussed earlier) to determine their recreational and environmental qualities.
130. The majority of sites supported local amenity and recreational activities for various community groups while the remainder had many environmental

qualities. This meant that they would be protected by the proposed draft Local Plan policy to protect open spaces (Policy 67) which will continue to protect open spaces of recreational and, or environmental quality. The current policy of protecting open spaces is considered to have been successful in retaining these areas while providing a degree of flexibility in their replacement with enhanced facilities. This policy approach provides an established and consistent approach, applicable within the whole of the Council's boundary. The introduction of a Local Green Space designation could restrict sustainable forms of development and introduce inconsistencies in the way in which open spaces are protected. Policy 67, which will protect open spaces in the new Local Plan, provides much greater clarity as to what replacement facilities would be permissible. It is therefore considered more beneficial to protect these proposed sites under Policy 67 which will continue to protect these areas while allowing certain forms of replacement facilities which should ensure improved recreational facilities without affecting the environmental qualities of these sites and therefore is considered a more sustainable approach to protecting these sites.

Findings of the Sustainability Appraisal of the Cambridge Local Plan (July 2013)

131. The findings of the Sustainability Appraisal of the draft Cambridge Local Plan, were that overall the plan would lead to significant positive effects in terms of the following SA objectives:
 - protect and enhance the landscape setting of the city, which comprises the Cambridge Green Belt, the green corridors penetrating the urban area, the established network of multi-functional green spaces, and tree canopy cover in the city.
 - promote social cohesion and sustainability and a high quality of life by maintaining and enhancing provision for open space, sports and recreation, community and leisure facilities, including arts and cultural venues that serve Cambridge and the sub-region.
 - ensure appropriate and timely provision of environmentally sustainable forms of infrastructure to support the demands of the city, including digital and cultural infrastructure.
 - promote a safe and healthy environment, minimising the impacts of development and ensuring quality of life and place.

132. The appraisal noted that the plan would seek to improve the baseline situation through infrastructure provision. Gardens and open spaces should be protected which will help protect against flood risk. SuDS schemes and multi-functional green and blue infrastructure should provide links and routes for species to migrate. 'Climate-proof' species and planting should ensure that landscaping is tolerant to heat and drought and also saturation. Protecting open space, trees, gardens and natural areas should help mitigate the urban heat island effect through encouraging transpiration, 'urban cooling' and providing shade.

133. The appraisal noted that the plan should lead to significant positive effects in terms of climate change adaptation and flood risk by ensuring that new development is resilient to climate change and contributes towards reducing flood risk across the city. No recommendations were made.
134. The appraisal noted that the policy should ensure that development proposals do not harm the character, or lead to the loss of, open space of environmental value, which should lead to positive effect in terms of biodiversity. This policy could however be strengthened by noting that, where it is necessary to re-provide open space of environmental value in an alternative location, that such relocations should be made with consideration to the green infrastructure network of the City as a whole (in addition to factors currently considered by the Policy, such as walking distance). While not included in the policy wording, it was considered sufficient to include supporting policy text that required proposals to improve public access and to support the Green Infrastructure Strategy.
135. The appraisal concludes that the City’s open space is valuable to the health and wellbeing of its residents. The protection of such space is therefore an important consideration and one that is addressed by Policy 67 which states that development proposals will not be permitted which would harm the character of, or lead to the loss of, open space of recreational importance unless it can be satisfactorily replaced. In addition to these protective measures, Policy 68 calls for all residential development proposals to contribute to the provision of open space and recreation facilities on-site, with this provision to address local deficiencies where possible. The focus on both protection and provision set out through these Policies should result in significant positive effects given the additional demand that is likely to be placed on these spaces through development and a growing population, plus the need to improve health outcomes through increased physical activity.

Key Issues raised during Proposed Submission consultation

Policy 67: Protection of open space	
Total Representations: 46	
Object: 41	Support: 5
Objections	<ul style="list-style-type: none"> Remove "replacement" option for environmentally important sites; More robust policy protection required; policy fails to prevent duplication/intensification of uses; Remove reference to 'educational need'; a demonstrable need may not be strictly 'educational' in use, although the proposed development must be needed to support the educational facilities provision;

	<ul style="list-style-type: none"> • Amended policy to allow the continued growth of the College; • Policy is inflexible and does not reflect circumstances where development proposals can enhance the character, use and visual amenity of open space, and provide ancillary recreational facilities; • Natural England concerned that a criteria-based policy to protect and enhance soils is missing.
Support	<ul style="list-style-type: none"> • Sport England and The Wildlife Trust support this policy.

Minor Modifications suggested following Proposed Submission consultation and implications for Sustainability Appraisal

136. As a result of assessment, one minor modification is suggested for criterion (a) of Policy 67 Protection of Open Space. This change is in the Addendum to the Cambridge Local Plan 2014: Proposed Submission document marked as PM/7/010.

137. In order to provide clarity and in response to a representation (representation number 26270), it is suggested that criterion a of Policy 67 be reworded as follows:

“a. the open space ~~uses~~ can be satisfactorily replaced in terms of quality, quantity and access with an equal or better standard than that which is proposed to be lost; and”

138. Following consideration of the impact of this change on the Sustainability Appraisal Framework, it has been concluded that this change does not materially alter the findings of the Sustainability Appraisal.

Policy 68: Open Space and Recreation Provision through New Development

EXISTING POLICY TO BE REPLACED (CAMBRIDGE LOCAL PLAN 2006)	OPTION(S) BEING TAKEN FORWARD FROM THE ISSUES AND OPTIONS REPORT (2012) AND ISSUES AND OPTIONS 2 (2013)	OPTION(S) NOT BEING TAKEN FORWARD FROM THE ISSUES AND OPTIONS REPORT (2012)
<ul style="list-style-type: none"> • 3/8 Open Space and Recreation • Provision through New Development 	<ul style="list-style-type: none"> • Option 165 Update the Open space standards in line with the Open Space and Recreation Strategy • Option 167 On site provision 	<ul style="list-style-type: none"> • Option 166 Maintain the current standards

Key issues raised during Issues and Options (2012) and Issues and Options 2 (2013) consultations:

SECTION OF THE ISSUES AND OPTIONS REPORT (2012)	KEY ISSUES ARISING FROM CONSULTATION
Option 165: Update the standards in line with the Open Space and Recreation Strategy 2011	<ul style="list-style-type: none"> • Support principle for allotment provision for all residential developments; • Maxima not minima provision should be sought; • Allotment provision: <ul style="list-style-type: none"> ○ Unviable or not desirable and would provide long-term issues to do with servicing and maintenance; ○ Unrealistic in built-up area; • New open spaces provided should be adopted and maintained by public organisations to ensure public access
Option 166: Maintain the current standards for open space and recreation provision	<ul style="list-style-type: none"> • Cambridge has many open spaces and recreational areas; • Allotment provision unviable or not desirable and would provide long-term issues to do with servicing and maintenance; • Inadequate in light of growth plans including allotment provision.
Option 167: On-site provision	<ul style="list-style-type: none"> • Support is conditional on <ul style="list-style-type: none"> ○ Having clear reasons for not providing an on-site contribution; ○ Presumption in favour of onsite provision; ○ Off-site provision only in exceptional conditions; ○ Very clear guidance; ○ Onsite provision is completed before occupation; ○ No planning permission unless on-site provision is provided • Green spaces should be multi-functional and support the objectives of the Cambridgeshire Green Infrastructure Strategy; • Dislike for off-site contributions; on-site provision should be provided wherever possible and weighted according to ward deficit; • Need to consider leisure facilities which provide play and sports facilities; • Accessibility of open space needs to be considered.
NEW OPTIONS ARISING FOLLOWING COMMUNITY INVOLVEMENT	
No additional options have been suggested.	

Evidence base:

- Cambridge City Council (2009). Sports Strategy 2009 – 2013;
- Cambridge City Council (2010). Cambridge Parks – Managing the City’s Asset 2010 to 2014;
- Cambridge City Council (2011). Open Space and Recreation Strategy 2011.

How the policy came about:

139. Open spaces, regardless of ownership, are a key aspect of high quality urban environments and are fundamental to the character of the city. In addition to having an important role to play in the streetscape, these areas provide people with a place to relax and socialise as well as encouraging healthier lifestyles by providing opportunities for sport and informal play. They also provide important opportunities to support a wide range of citywide strategies, including biodiversity, climate change, green infrastructure, surface water management and flood risk prevention. The National Planning Policy Framework recognises the important contribution that access to high quality open spaces and opportunities for sport and recreation makes to the health and well-being of communities. Policy 69 will implement the findings of the Council’s Open Space and Recreational Strategy (2011), which provides the assessment of the need for open space, sports and recreation facilities as required by the National Planning Policy Framework.
140. A number of options related to open space provision from new development were consulted on as part of the Issues and Options (2012) consultation. There was strong support for a presumption in favour of on-site provision was considered essential, particularly in those wards with deficiencies in open space, with off-site provision only in exceptional conditions with very clear guidance. It was considered essential that onsite provision should be completed before any occupation. Green spaces should be multi-functional and support the objectives of the Cambridgeshire Green Infrastructure Strategy.
141. The approach being taken in Policy 68 requiring the provision of new open spaces and recreation facilities is in keeping with the requirements of paragraph 70 of the National Planning Policy Framework, which advises that planning policies should plan positively, including for the provision and use of shared spaces to enhance the sustainability of communities and residential environments. Paragraph 73 explains how policies should be based upon robust and up-to-date assessments of the needs for open space, sports and recreation facilities and opportunities for new provision. The Council’s Open Space and Recreation Strategy (2011) is in keeping with the requirements of the National Planning Policy Framework and has identified a number of deficiencies in terms of both the quantity and quality of open space provided.

142. The interim Sustainability Appraisal supported the provision of open spaces on-site, as opposed to financial contributions, to ensure that new and existing communities benefit from open spaces in their local areas. This will have a significant positive effect across Cambridge where maintenance and access to open space has been identified as a key sustainability issue. By taking into account the appropriateness of the provision given the nature, location and scale of the development, this option should result in the delivery of sites that are sensitive to the character and distinctiveness of Cambridge's built environment. On-site provision would have potential benefits for biodiversity and improved green infrastructure, and could potentially contribute to reducing flood risk.
143. To address local concerns regarding the lack of on-site provision with new housing developments, off-site financial contributions in lieu on-site provision will no longer be acceptable. However, there may be exceptions to this. The site itself may have particular constraints that prevent the delivery of quality on-site open space provision. In other circumstances, new residents and the local community may benefit more from the public open space contribution being spent on a nearby local play area.
144. On-site provision should take account of the appropriateness of the provision given the nature, location and scale of the development. This approach is supported by the interim Sustainability Appraisal, which concludes that this approach should result in the delivery of sites that are sensitive to the character and distinctiveness of Cambridge's built environment. On-site provision would have potential benefits for biodiversity and improved green infrastructure, and could potentially contribute to reducing flood risk.
145. Any on-site open space provision should be completed before half of the residential dwellings are occupied. This provides a more flexible approach for a site's deliverability compared with the requirement for the on-site open space provision to be completed before any occupancy is permitted. Discussions regarding the provision of any on-site open spaces should be held at an earliest stage of planning to ensure these spaces are an integral part of the design. This is equally important for both large and small residential developments. In areas where there exist identified deficiencies in open space provision and in particular for constrained sites, these discussions/negotiations should also involve how best to provide on-site provision. Any sites unable to make full on-site contribution will need to provide clear evidence of any exceptional circumstances to justify off-site contributions.
146. The council's Open Space and Recreation Strategy (2011) and its successor documents should be used to guide the planning process on the provision of open space by continuing to inform the masterplanning process for the urban extensions and through the consideration of all new development. Where possible, any new green spaces should be multi-functional and support the objectives of the Cambridgeshire Green Infrastructure Strategy.

147. Unless a development is large enough to provide on-site indoor sports provision, contributions will be collected and used to support the council's current Sports Strategy. Some policy flexibility should be provided to allow new sport leisure facility contributions to be provided in the form of improved access to private leisure facilities through community use agreements, assuming there is sufficient excess capacity. This option would be beneficial in circumstances where the alternative financial contributions are not sufficient to provide a new leisure facility.
148. In relation to large developments and urban extensions where over 1ha outdoor sports provision is required, it will be important to ensure that sufficient ancillary facilities are provided (e.g. changing rooms and car parking) and clustered together.
149. Sport England was consulted on the draft versions of the policy. They requested the following change: "Residential development proposals will be required to provide public open space and sports facilities, either through on-site provision or contributions to off-site provision...". No decision has been taken by the council regarding the way in which contributions will be sought towards community indoor facilities such as swimming pools and sports halls. Other forms of open spaces set out in the open space and recreation standards will be provided on-site where feasible unless it can be better provided in an alternative location.
150. The necessity to specify a threshold (number of units) where residential development site will be expected to make on-site provision for outdoor sport as opposed to contributions to off-site facilities was also raised by Sport England. On-site provision should conform to the open space standards set out in Appendix I of the draft Local Plan. Policy 68 allows for a more flexible approach to the implementation of the Open Space and Recreation Standards. While the principle of the policy is to ensure that all residential development proposals contribute to the provision of open space and recreation facilities on-site, the policy requires a more holistic approach to their implementation. Their integration should be considered early in the design process, as should the precise type depending on size and location of the proposal and the existing open space provision in the area. This will provide a more flexible approach to ensure the most appropriate outcome is determined based upon local circumstances.

Findings of the Sustainability Appraisal of the Cambridge Local Plan (July 2013)

151. The findings of the Sustainability Appraisal of the draft Cambridge Local Plan were that overall the plan would lead to significant positive effects in terms of the following SA objectives:

- protect and enhance the landscape setting of the city, which comprises the Cambridge Green Belt, the green corridors penetrating the urban area, the established network of multi-functional green spaces, and tree canopy cover in the city.
 - promote social cohesion and sustainability and a high quality of life by maintaining and enhancing provision for open space, sports and recreation, community and leisure facilities, including arts and cultural venues that serve Cambridge and the sub-region.
 - ensure appropriate and timely provision of environmentally sustainable forms of infrastructure to support the demands of the city, including digital and cultural infrastructure.
 - promote a safe and healthy environment, minimising the impacts of development and ensuring quality of life and place.
152. The appraisal noted that the plan would seek to improve the baseline situation through infrastructure provision. Gardens and open spaces should be protected which will help protect against flood risk. SuDS schemes and multi-functional green and blue infrastructure should provide links and routes for species to migrate. 'Climate-proof' species and planting should ensure that landscaping is tolerant to heat and drought and also saturation. Protecting open space, trees, gardens and natural areas should help mitigate the urban heat island effect through encouraging transpiration, 'urban cooling' and providing shade.
153. The appraisal noted that the plan should lead to significant positive effects in terms of climate change adaptation and flood risk by ensuring that new development is resilient to climate change and contributes towards reducing flood risk across the city. No recommendations were made.
154. The appraisal highlighted that the policy focused on the provision of open space in residential proposals but failed to encourage consideration of the biodiversity value of such spaces or their integration in the wider green infrastructure network. A sentence was added to the supporting policy text requiring replacement site/facilities to give due consideration to the enhancement of biodiversity and links to the wider ecological network.
155. The appraisal concludes that the City's open space is valuable to the health and wellbeing of its residents. The protection of such space is therefore an important consideration and one that is addressed by Policy 67 which states that development proposals will not be permitted which would harm the character of, or lead to the loss of, open space of recreational importance unless it can be satisfactorily replaced. In addition to these protective measures, Policy 68 calls for all residential development proposals to contribute to the provision of open space and recreation facilities on-site, with this provision to address local deficiencies where possible. The focus on both protection and provision set out through these Policies should result in significant positive effects given the additional demand that is likely to be

placed on these spaces through development and a growing population, plus the need to improve health outcomes through increased physical activity.

Key Issues raised during Proposed Submission consultation

Policy 68: Open space and recreation provision through new development	
Total Representations: 18	
Object: 13	Support: 5
Objections	<ul style="list-style-type: none"> • Open space should be provided as part of all new developments; • Policy should presume on-site provision with no 'get out clause'; • Clearer definition of protected open spaces on the policies map; • Development contributions should not be required to address existing deficiencies in open space provision. Policy clarification needed to ensure that duplicate provision would not be required; • Natural England requested provision of an overarching Green Infrastructure policy that covers the local authority area more widely than just the West Cambridge Area of Major Change, and separate from Policy 68.
Support	<ul style="list-style-type: none"> • Fundamentally important to the quality of life.

Minor modifications suggested following Proposed Submission consultation and implications for Sustainability Appraisal

156. As a result of assessment, one minor modification is suggested for Policy 68 Open space and recreation provision through new development. This change is in the Addendum to the Cambridge Local Plan 2014: Proposed Submission document marked as PM/7/011.

157. In response to a representation (representation number 27626), to provide clarity and to ensure that the local plan is compatible with the merging Cambridge Community Infrastructure Levy and the Community Infrastructure Levy Regulations (2010 as amended), following rewording of Policy 68 is proposed:

“All residential development proposals should contribute to the provision of open space and recreation sites/facilities on-site. The successful integration of open space into a proposed development should be considered early in the design process. The precise type of on-site provision required will depend on the size and location of the proposal and the existing open space provision in the area. Where there are deficiencies in certain types of open space provision in the area surrounding a proposed development, the Council will seek variations in the component elements to be provided by the developer in order to overcome them.

Requirements will be calculated using the Open Space and Receptions Standards (see Appendix I) and will have regard to the Council’s adopted Open Space and Recreation Strategy.

Alternative provision off-site of open space may be acceptable ~~if the developer has entered into a planning obligation to make a financial or in kind contribution towards meeting the identified open space needs of a proposal off site~~ in the following circumstances:

- a. if the proposed development site ~~would be~~ is of insufficient size in itself to make the appropriate provision (in accordance with Appendix I) feasible within the site; or,
- b. In exceptional circumstances, if taking into account the accessibility/capacity of existing open space sites/facilities and the circumstances of the surrounding area, the open space needs of the proposed residential development can be met more appropriately by providing either new or enhanced provision off-site.

Where appropriate, and subject to the Regulations in force at the time, the Council will seek to enter into a Section 106 agreement with the developer to implement the above, and for the future management and maintenance of the open space provision, before granting planning permission.”

158. Following consideration of the impact of these changes on the Sustainability Appraisal Framework, it has been concluded that these changes do not materially alter the findings of the Sustainability Appraisal.

Policy 69: Protection of Sites of Local Nature Conservation Importance

EXISTING POLICY TO BE REPLACED (CAMBRIDGE LOCAL PLAN 2006)	OPTION(S) BEING TAKEN FORWARD FROM THE ISSUES AND OPTIONS REPORT (2012) AND ISSUES AND OPTIONS 2 (2013)	OPTION(S) NOT BEING TAKEN FORWARD FROM THE ISSUES AND OPTIONS REPORT (2012)
<ul style="list-style-type: none"> • 4/6 Protection of Sites of Local Nature Conservation Importance 	<ul style="list-style-type: none"> • Option 77 Protection of sites of sites of nature conservation importance 	<ul style="list-style-type: none"> • Not applicable

Key issues raised during Issues and Options (2012) and Issues and Options 2 (2013) consultations:

SECTION OF THE ISSUES AND OPTIONS REPORT (2012)	KEY ISSUES ARISING FROM CONSULTATION
Option 77: Protection of sites of nature conservation importance	<ul style="list-style-type: none"> • There were several general statements of support for this policy which is seen as important; • Objection to the appropriate assessment of sites that are not covered by the Conservation Regulations 1994 (e.g. County or City Wildlife Sites). This requirement would be unnecessarily onerous and could impact on the viability of development; • Development proposals near such sites should not be 'assessed', they should be thrown out automatically. There should be no development on wildlife sites; • Policy/policies should ensure that development will only be supported where it can be adequately demonstrated that proposals will not have an adverse effect on biodiversity, where required suitable mitigation measures must be acceptable and deliverable; • The policy is needed and it needs to be enforced robustly; • Better protection is needed for green spaces and commons within the city; • Measures to enhance biodiversity should promote native species.
NEW OPTIONS ARISING FOLLOWING COMMUNITY INVOLVEMENT	
No additional options have been suggested.	

Evidence base:

- Cambridge City Council (2005). Cambridge City Wildlife Site Register 2005;
- Cambridge City Council (2006). Cambridge City Nature Conservation Strategy 2006;
- Department for Environment Food and Rural Affairs (2010). Lawson Report: Making Space for Nature: A review of England's Wildlife Sites and Ecological Network.

How the policy came about:

159. The designation and protection of sites of local nature conservation is critical to achieving a viable ecological network across the city, offering enhanced quality of life and greater ecosystem resilience allowing adaptation in response to climate change. Given the few national sites within Cambridge the ecology of the City and wider countryside depends on these local wildlife sites.

Development within or affecting Local Nature Reserves, County Wildlife Sites and City Wildlife Sites is dealt with in paragraphs 113 and 118 of the National Planning Policy Framework. Given the lack of detail on assessment of the potential impact of development upon sites of local and nature conservation importance and the need to mitigate the impact of that development, it is considered appropriate to bring forward a policy covering these issues.

160. The policy will continue to protect and seek enhancements and increased habitat connectivity to these sites through the development process to support and retain the character and appeal of Cambridge as a place to live, study, work and visit.
161. The proposed policy is similar to the current Local Plan policy 4/6 Protection of Sites of Local Nature Conservation Importance and was the only option presented in the Issues and Options paper. There was strong support for this option to be pursued in order to protect locally significant sites of nature conservation importance.
162. Given strong local support for this policy and the need to protect and enhance sites of local nature conservation importance, officers recommended to pursue this policy to ensure that the Local Plan requires proportional ecological information to determine any application on, adjacent to or affecting a designated nature conservation site. In line with the National Planning Policy Framework requirements, the policy incorporates a requirement for development to seek biodiversity enhancement, as well as protection. The National Planning Policy Framework requires Local Authorities to set policies against which proposals for any development on or affecting protected wildlife sites will be judged.
163. The interim Sustainability Appraisal considers the use of a criteria based approach to the protection of sites of nature conservation importance will ensure that the conservation of biodiversity in Cambridge is effective and proportionate. Protection will contribute to the quality of the environment in terms of open and green space across the city. The conservation of biodiversity has potentially positive effects on health and wellbeing. Economically it could contribute positively through protecting ecosystem services, which can include improved water quality.

Findings of the Sustainability Appraisal of the Cambridge Local Plan (July 2013)

164. The findings of the Sustainability Appraisal of the draft Cambridge Local Plan were that overall the plan would lead to significant positive effects in terms of the following SA objectives:
 - protect and enhance the city's biodiversity, network of habitats and geo-diversity

165. The appraisal notes that Policy 69 should not lead to an adverse effect or loss (whole or part) of a Local Nature Reserve, or, where appropriate, that suitable levels of mitigation are achieved. Such protection of the City’s most important wildlife sites should result in positive effects. However, this policy could be strengthened by making clear that, where required, replacement habitat should be provided in a suitable location within the Cambridge green infrastructure network in order to ensure that ecological connectivity is maintained or enhanced. A reference to improved nature conservation value “through habitat creation, linkage and management” has been included to ensure site linkage is considered without being too prescriptive as this may vary depending on the location and site characteristics.

Key Issues raised during Proposed Submission consultation

Policy 69: Protection of sites of local nature conservation importance	
Total Representations: 10	
Object: 5	Support: 5
Objections	<ul style="list-style-type: none"> • Policy should be strengthened; protection, rather than the possibility of development, should be the intent of this policy; • Proposals on or adjacent to a site of local conservation importance should not be refused planning permission without proper consideration; • Natural England have stated that policy needs to reflect the NPPF which confirms that any proposal that adversely affects a European site, or causes significant harm to a SSSI, will not normally be granted permission.
Support	<ul style="list-style-type: none"> • Development will only be allowed where it will not adversely affect biodiversity and nature; • City Wildlife Sites should be recognised fully for their importance.

Minor Modifications suggested following Proposed Submission consultation and implications for Sustainability Appraisal

166. As a result of assessment, one minor modification is suggested to paragraph 7.59 of the supporting text of Policy 69 Protection of sites of local nature conservation importance. This change is in the Addendum to the Cambridge Local Plan 2014: Proposed Submission document marked as PM/7/012.

167. In order to provide clarity and in response to a representation (representation number 26322), it is suggested that the final sentence of paragraph 7.59 be reworded as follows:

“Proposals on or adjacent to a site of local conservation importance should ~~not be refused without give~~ proper consideration to ~~of~~ the potential to enhance

the designated site's biodiversity through enhanced management, habitat creation or the formation of new linkages with adjacent habitat areas.”

168. Following consideration of the impact of these changes on the Sustainability Appraisal Framework, it has been concluded that these changes do not materially alter the findings of the Sustainability Appraisal.

Policy 70: Protection of Priority Species and Habitats

EXISTING POLICY TO BE REPLACED (CAMBRIDGE LOCAL PLAN 2006)	OPTION(S) BEING TAKEN FORWARD FROM THE ISSUES AND OPTIONS REPORT (2012) AND ISSUES AND OPTIONS 2 (2013)	OPTION(S) NOT BEING TAKEN FORWARD FROM THE ISSUES AND OPTIONS REPORT (2012)
<ul style="list-style-type: none"> • Not applicable 	<ul style="list-style-type: none"> • Option 78 protection of priority species and habitats 	<ul style="list-style-type: none"> • Not applicable

Key issues raised during Issues and Options (2012) and Issues and Options 2 (2013) consultations:

SECTION OF THE ISSUES AND OPTIONS REPORT (2012)	KEY ISSUES ARISING FROM CONSULTATION
Option 78: Protection of priority species and habitats	<ul style="list-style-type: none"> • Several statements of support in favour of a policy for the protection of priority species and habitats; • When a case is made for protection of a species that is not on the Section 41 list, it must also be considered; • No need for a Local Plan policy, detailed guidance should be provided in Supplementary Planning Document guidance on Nature Conservation issues.
NEW OPTIONS ARISING FOLLOWING COMMUNITY INVOLVEMENT	
No additional options have been suggested.	

Evidence base:

- Department for Environment Food and Rural Affairs (2006). Natural Environment and Rural Communities Act 2006; Section 41 of the Natural Environment and Rural Communities (NERC) Act 2006 - Habitats and Species of Principal Importance in England List, available at <http://ukbars.defra.gov.uk/archive/news/details.asp?X=45> under Lists of Habitats and Species – August and November 2010;
- Department for Environment Food and Rural Affairs (2012). UK Biodiversity Action Plan (1992-2012);

- Cambridge City Council (2006). Cambridge City Council Nature Conservation Strategy (2006);
- Cambridgeshire County Council (2008). Cambridgeshire Local Biodiversity Action Plan.

How the policy came about:

169. The proposed policy is similar to the current Local Plan policy 4/7 (Species Protection) and assists the Council in continuing to comply with its duty to conserve biodiversity under the Natural Environment and Rural Communities Act 2006. Furthermore, the National Planning Policy Framework promotes the preservation, restoration and re-creation of priority habitats, ecological networks and the protection and recovery of priority species populations, linked to national and local targets (Paragraph 117).
170. Only one option was presented for development as the authority has a duty to protect priority species and habitats. Such an approach is consistent with the requirements of the National Planning Policy Framework. This policy option was strongly supported during consultation on the Issues and Options Report and reflects the need for this approach to continue protecting priority habitat and species across the city. Vulnerable habitats and species will continue to be identified on the Section 41 list or in the Cambridgeshire Biodiversity Action Plan.
171. Protection of non-priority species does not lie within the scope of this policy option. Where ecological surveys identify locally important species populations and habitats, the management of these species and their protection will need to be addressed through the policy approach to good design of new development.
172. This policy ensures that the Local Plan requires that development will only be supported where it can be adequately demonstrated that proposals will not have an adverse effect on priority habitats and species; and, where required, suitable mitigation measures and proposed enhancement measures are both acceptable and deliverable.
173. The interim Sustainability Appraisal concluded that by preventing or mitigating the effects of developments that will directly or indirectly impact upon rare or vulnerable species or habitats, this option should help to conserve threatened biodiversity. This is likely to contribute to the quality of green and open space citywide, along with wider potential benefits from ecosystem service provision.

Findings of the Sustainability Appraisal of the Cambridge Local Plan (July 2013)

174. The findings of the Sustainability Appraisal of the draft Cambridge Local Plan were that overall the plan would lead to significant positive effects in terms of the following SA objectives:

- protect and enhance the city’s biodiversity, network of habitats and geo-diversity

175. The appraisal notes that Policy 70 sets out to protect the Cambridge’s key biodiversity assets, noting that if significant harm to the population or conservation status of a protected species, priority species or priority habitat resulting from a development cannot be avoided, adequately mitigated, or, as a last resort, compensated, then planning permission will be refused. As such this is likely to lead to positive effects in terms of biodiversity.

Key Issues raised during Proposed Submission consultation

Policy 70: Protection of priority species and habitats	
Total Representations: 9	
Object: 5	Support: 4
Objections	<ul style="list-style-type: none"> • Policy should actively promote and enhance the natural environment with ecological networks. These should be mapped on the policies map; • Biodiversity offsetting is rarely ever effective; • Policy should be strengthened with regard to minimising the loss of local biodiversity. Mitigation/compensatory measures should be the last resort; • Natural England have stated that policy needs to reflect the NPPF which confirms that any proposal that adversely affects a European site, or causes significant harm to a SSSI, will not normally be granted permission.
Support	<ul style="list-style-type: none"> • Adequate protection should be provided to the water voles in Cherry Hinton Brook.

Minor Modifications suggested following Proposed Submission consultation and implications for Sustainability Appraisal

176. No changes to Policy 70 Protection of priority species and habitats or the supporting text are suggested in the Addendum to the Cambridge Local Plan 2014: Proposed Submission document. There are therefore no impacts on the findings of the Sustainability Appraisal.

Policy 71: Trees

EXISTING POLICY TO BE	OPTION(S) BEING TAKEN	OPTION(S) NOT BEING
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REPLACED (CAMBRIDGE LOCAL PLAN 2006)	FORWARD FROM THE ISSUES AND OPTIONS REPORT (2012) AND ISSUES AND OPTIONS 2 (2013)	TAKEN FORWARD FROM THE ISSUES AND OPTIONS REPORT (2012)
• 4/4 Trees	• Option 83 Trees	

Key issues raised during Issues and Options (2012) and Issues and Options 2 (2013) consultations:

SECTION OF THE ISSUES AND OPTIONS REPORT (2012)	KEY ISSUES ARISING FROM CONSULTATION
<p>Option 83: Trees</p> <p>This option would allow for the development of a policy to protect existing trees affected by development proposals.</p>	<ul style="list-style-type: none"> • Several statements in support of this policy option; • A replacement policy would be more sensible than preventing trees from being harmed; • The ‘wherever possible’ element could allow developers to wriggle out of their responsibility; • In favour of the retention of hedges and veteran trees; • A flexible approach should be promoted; • The criteria for judging whether a tree should be felled needs to be stronger; • The policy should recognise the role of trees in the setting and character of the city and its neighbourhoods, and in providing visual amenity, environmental and social benefits; • When a large tree is removed a greater number of smaller trees should be planted, to ensure similar levels of habitat; • The Council’s proposed policy should incorporate the flexibility provided in the National Planning Policy Framework (Paragraph 118) where the loss of veteran trees might be outweighed by the benefits of new development; • Policy needs to account for the felling of trees in anticipation of development; • There should be ongoing maintenance of trees provided as part of large developments.
NEW OPTIONS ARISING FOLLOWING COMMUNITY INVOLVEMENT	
No additional options have been suggested.	

Evidence base:

- National Urban Forestry Unit (2005). Trees Matter! Bringing lasting benefits to people in towns;
- Town and Country Planning Act 1990 (as amended);
- Cambridgeshire Horizons (2011). Green Infrastructure Strategy for Cambridgeshire;
- Cambridge City Council. Conservation Area Appraisals;
- Cambridge City Council (2003). Cambridge Landscape Character Assessment.

How the policy came about:

177. Cambridge has an above average amount of good quality tree canopy cover. Part of the unique and pleasant character of Cambridge is due to a large number of trees in public open spaces, and on private and highway land. To maintain this natural asset, due consideration and protection of existing trees and hedges must be demonstrated.
178. Trees on or affected by development sites are a material consideration in the determination of applications. They are an important facet of the townscape and landscape and the maintenance of a healthy and species diverse tree cover brings a range of well-being, ecological and microclimate benefits.
179. When assessing development close to trees, the health of the trees both in the present and the future should be considered. For example, providing habitable rooms close to maturing trees may result in a need for significant surgery to the trees in the future which would have been obviated if the building had been located to give the tree room to grow at the outset. Replacement tree planting should also be allowed adequate space to mature without the necessity of future, excessive pruning of branches and confinement of roots.
180. The management of trees requires great care and forethought therefore a tree management plan should be provided where trees are retained on-site. There are occasions where felling, or significant surgery to trees, is acceptable. In such cases the amenity value of the tree, its condition and potential life will be weighted against the safety from its removal, the protection of other important site features or any more general benefits of a new development. When felling is approved, the replanting of an appropriate tree species in the vicinity will normally be required.
181. The benefit of trees in the urban environment is now well documented¹ and can be summarised as follows:
- For the environment, trees can reduce the urban heat island² and sequestering carbon, provide shade and make streets cooler in the

¹ No Trees, No Future: Trees in the Urban Realm, Trees and Design Action Group, (2008)

² Gill, S., Handley, J., Ennos, A., and Pauleit, S., Adapting Cities for Climate Change: The Role of The Green Infrastructure, Built Environment, Vol 3, No 1, pages 115-133, University of Manchester, (2007).

summer, increase biodiversity and provide food and shelter for wildlife, reduce the effect of flooding³, improve air quality and reduce dust particles⁴, give shade and shelter to buildings and thereby reduced energy costs, reduce traffic noise.;

- For people, trees provide visual focal points and landmarks and provide a sense of place and they maintain the link with nature for the urban dweller. They also have a positive impact on physical and mental well-being^{5 6}.
- For the local economy, trees offer benefits through having the potential to increase residential and commercial property value by between 7 and 15%⁷ by improving the local environment. The economy also benefits through improvements to the environmental performance of building through heating and cooling cost reduction. As the presence of trees also improves the health and well-being of local residents and therefore reduce health care costs.

182. Space for existing and replacement trees to thrive and mature should be allowed for within developments. Streets should be designed to have adequate set backs to buildings to allow for a variation of tree species sizes in proportion to the street and the buildings. Opportunities to plant large species trees should be maximised with the use of adequate building set-backs, efficient and combined utilities routes and rootcell systems for rooting volume⁸.

183. The proposed policy is similar to the current Local Plan policy 4/4 Trees and assists the Council in continuing to protect existing trees affected by development proposals. Furthermore, the National Planning Policy Framework promotes the preservation of aged or veteran trees (Paragraph 118).

184. Only one option related to trees was considered during the Issues and Options (2012) consultation, option 83: Trees. Policy 71 takes forward this option. The protection of existing trees is likely to contribute positively to maintaining biodiversity, especially in the case of ancient trees and hedgerows, which provide important habitat and ecological connectivity. Given that the presence of trees also contributes positively to visual amenity, this option should also help enhance both the setting of the city and its townscape, as it seeks to protect trees with significant amenity value to the public realm. The retention

³ Soltis D, Loss of trees increase stormwater runoff in Atlanta, Water Engineering and Management 144: 6, (1997).

⁴ Broadmeadow MSJ, and Freer-Smith PH, Urban Woodland and the Benefits for Local Air Quality, Research for Amenity Trees No. 5 HMSO, (1996).

⁵ National Urban Forestry Unit, Trees and Healthy Living, National Conference, Wolverhampton, National Urban Forestry Unit, (1999).

⁶ Ulrich RS, Simmons RF, Losito BD, Fiority E, Miles MA and Zeison M, Stress Recovery During Exposure to Natural and Urban Environments, Journal of Environmental Psychology 11: 201-230. (1991).

⁷ Cabe Space, Does money grow on Trees? Commission for Architecture and the Built Environment, (2005).

⁸ Tom Armour, Mark Job and Rory Canavan, The benefits of large species trees in the urban landscapes: a costing, design and management guide, Ciria C712, (2012).

and enhancement of hedges and trees, is likely to have positive effects on community and wellbeing, as green and open space is protected. In addition, air quality in and around the city centre has been identified as a key issue, and this option is likely to contribute to improved air quality. Positive effects may also result with respect to flood risk, as protecting trees will contribute to enhancing natural flood risk management infrastructure.

185. The majority of representations to the Issues and Options consultation supported the proposed policy for the protection of existing trees and hedges. Policy 71 recognises the valued contribution trees make to the built and natural environment and is likely to have a wide range of environmental and social benefits including: improving air quality, reducing noise, cooling the urban environment, aiding sustainable drainage, and adding economic value to areas. It is also likely to contribute positively to maintaining biodiversity, especially in the case of ancient trees and hedgerows, which provide important habitats and ecological connectivity. These positive benefits were reflected in the findings of the interim Sustainability Appraisal, which found that such a policy would be likely to have positive implications for the protection of trees and hedges that contribute to the visual amenity and character of Cambridge at a community, neighbourhood or city level. In accordance with the Town and Country Planning Act 1990 (as amended), this policy approach will ensure the protection of an excess of 500 Tree Preservation Orders and thousands of trees in the Conservation Areas across the city which play an important role in the character and setting of the city, as well as promoting the planting of new trees as part of new development proposals helping to enhance the canopy cover of the city.
186. Some representations to the Issues and Options consultation raised the issue of the felling of trees and replacement planting. Where felling is required, replacement planting must be appropriate to both the development and the surrounding area. It is not therefore considered appropriate to require or specify that multiple trees to be planted to replace one large tree. It is however noted that the wording 'wherever possible' should be excluded from the policy to avoid the responsibility of developers being lost. With regards to the ongoing maintenance of trees to ensure that they establish and flourish to maturity, this is already a consideration in new developments, and will continue to be important in the future. At present, the council maintains all new trees provided within the highway and on open spaces within new developments that are adopted by the council. The proposed policy will be in keeping with the National Planning Policy Framework, notably paragraph 118 which states that planning permission should be refused for development resulting in the loss or deterioration of irreplaceable habitats unless the need for, and the benefits of, the development outweigh the loss. While the policy will be flexible in this regard, the preference should be for veteran trees to be incorporated into new developments wherever possible, and the consideration of veteran trees should take place from the early stages of the development and design process to ensure successful integration.

187. As such, policy 71 has been put forward into the draft Local Plan, with some amendments following Issues and Options consultation as follows:

- the addition of a presumption in favour of the retention and enhancement of irreplaceable habitats, including aged and veteran trees, hedges, trees and other landscape features of amenity and biodiversity value, unless the need for, and the benefits of, the development clearly and demonstrably outweigh any loss;
- the protection of trees that have significant amenity value as perceived from the public realm; and
- that where felling is accepted, appropriate replacement planting will be required within the vicinity.

Findings of the Sustainability Appraisal of the Cambridge Local Plan (July 2013)

188. The findings of the Sustainability Appraisal of the draft Cambridge Local Plan were that overall the plan would lead to significant positive effects in terms of the following SA objectives:

- protect and enhance the city’s biodiversity, network of habitats and geo-diversity

189. The appraisal concludes that Policy 71 is likely to result in positive effects on local biodiversity as it requires the protection of trees of value, whilst noting that particular consideration should be given to veteran or ancient trees in order to preserve their ecological value.

Key Issues raised during Proposed Submission consultation

Policy 71: Trees	
Total Representations: 15	
Object: 7	Support: 8
Objections	<ul style="list-style-type: none"> • Greater attention should be given to the protection of locally significant trees. • Stronger evidence should be required for tree felling. • Policy should be strengthened.
Support	<ul style="list-style-type: none"> • Cambridge needs to protect its trees as well as planting more trees, including fruit and nut species especially those supporting biodiversity.

Minor Modifications suggested following Proposed Submission consultation and implications for Sustainability Appraisal

190. No changes to Policy 71: Trees or the supporting text are suggested in the Addendum to the Cambridge Local Plan 2014: Proposed Submission document. There are therefore no impacts on the findings of the Sustainability Appraisal.

AUDIT TRAIL: SECTION 8: SERVICES AND LOCAL FACILITIES

Policy 72: Development and change of use in district, local and neighbourhood centres

EXISTING POLICY TO BE REPLACED (CAMBRIDGE LOCAL PLAN 2006)	OPTION(S) BEING TAKEN FORWARD FROM THE ISSUES AND OPTIONS REPORT (2012) AND ISSUES AND OPTIONS 2 (2013)	OPTION(S) NOT BEING TAKEN FORWARD FROM THE ISSUES AND OPTIONS REPORT (2012)
Policy 6/7 Shopping Development and Change of Use in District and Local Centres	Option 137 Separate policy options for different types of centre	Option 136 General shopping policy that applies to all centres

Key issues raised during Issues and Options (2012) and Issues and Options 2 (2013) consultations:

SECTION OF THE ISSUES AND OPTIONS REPORT (2012)	KEY ISSUES ARISING FROM CONSULTATION
Option 136: General shopping policy that applies to all centres	<ul style="list-style-type: none"> • A number of objections to Option 136 which proposes a general policy for all centres. Preference for Option 137, which separates criteria for different types of centre, as different centres perform different roles and functions in the retail hierarchy; • Objection to larger retail developments providing smaller units. This would be an unnecessary restriction on development. Not in line with NPPF; • The growth of internet shopping is likely to reduce use of retail outlets in the city and reduce the need for increasing retail jobs; • There should be no loss of shops without justification; There is a need for economic vitality in all parts of the city, not just the City Centre; • The city requires more and smaller local shops outside the City Centre; • Economic downturn means that there does not seem to be any sort of justification for additional floorspace; • Object to control of floorspace by percentage of A1 use; During an economic climate where there should be a drive for town centre vitality and viability, such policies are considered too restrictive.

Option 137: Separate policy options for different types of centre	<ul style="list-style-type: none"> • Lots of support for this option which proposes a specific policy for each of the different types of centre and recognises the role and function of each type of centre would be different
NEW OPTIONS ARISING FOLLOWING COMMUNITY INVOLVEMENT	
No new options were put forward.	

Evidence base:

- Cambridge City Council Shopping Survey (2011/2012);
- the draft Retail and Leisure Update (2013);
- Retail and Leisure Study in 2008

How the policy came about:

1. The National Planning Policy Framework requires that in drawing up local plans, local planning authorities should promote competitive town centres that provide customer choice and a diverse retail offer and which reflect the individuality of town centres. It is important to set policies which make it clear to developers what uses will be permitted in different locations.
2. The Issues and Options Report set out two potential options dealing with shopping in different types of centre. Option 136 was a general shopping policy that applies to all centres, with some variations in relation to change of use relating to the type of centre. Option 137 was to have separate policies for different types of centre. In both policy options the policy would cover:
 - supporting vitality and viability;
 - having an appropriate scale of new development according to the nature and scale of the centre;
 - encouraging retail diversity and small shops;
 - control over change of use from retail (A1) to other uses; and
 - prevention of over-concentration of food and drink outlets.
3. The consultation showed clear support for Option 137, where there would be separate policies dealing with the City Centre, district and local centres, although there were some comments that the district and local centres could probably have shared policies. This approach was supported because it would clearly differentiate between the different types of centre and recognise their different role and functions.
4. It is proposed that a separate policy is produced for the City Centre, which will be in Section 3 of the draft Local Plan. Policy 73 meanwhile deals with district, local and neighbourhood centres. Although support was given to having a separate policy for each type of centre, it was found that this was very repetitive as many of the same principles apply to district, local and

neighbourhood centres. In all centres there is a desire to maintain the predominantly retail function of the centre, but to allow some change of use to other uses suitable in a centre if they would add to vitality and viability, maintain an active frontage and in the case of food and drink uses not give rise to a detrimental effect on amenity. A different approach is proposed for change of use in district centres to local and neighbourhood centres, and this is made clear in the policy. This reflects the desire to keep a predominant retail presence within the district centres as these have a wider catchment than the local and neighbourhood centres where the balance of uses is more important.

5. The Sustainability Appraisal considered that Option 136, based on existing policies would likely result in consent of similar shopping provision as provided to date. Although this would provide greater support for diversity of shopping provision by restricting change of use from small shops to larger units and requiring that large shopping developments provide a proportion of small shops. Furthermore, the encouragement of housing development on upper floors should contribute to meeting the city's housing shortage and provision of smaller (1-2 bed) homes.
6. Option 137 would provide the opportunity to tailor change of use criteria appropriately at the city, district and local centre level; thus helping better address their different requirements more effectively. In particular this approach could protect and support provision of convenience shopping in district and local centres, an identified sustainability issue. Meeting local need more effectively should help reduce the need to travel and help mitigate climate change impacts.
7. The policy has been developed to take into account the sustainability benefits highlighted in the Sustainability Appraisal such as measures to maintain a diversity of shops, encourage housing in upper floors, and having different change of use criteria for the different types of centre.

Evidence from Shopping Survey

8. The Cambridge City Council Shopping Survey (2011/2012) and the draft Retail and Leisure Update have been used to identify the most suitable hierarchy of centres for the new Local Plan. Potential changes to the hierarchy were consulted upon at Issues and Options (2012) and Issues and Options 2 (2013). The policy setting out the hierarchy of centres will be contained in Section 2.
9. The number of units and proportion of A1 uses for the different types of centre, is set out below. This information is from the council's shopping survey (2011/12).
10. The policy in the Cambridge Local Plan 2006 (6/7) requires that the proportion of A1 uses should not fall below 60% in the district and local centres. The Local Plan is not specific in how to calculate this and historically the percentage of A1

uses has been calculated as a proportion of those uses within the 'A' classes i.e. A1, A2, A3, A4 and A5. Although consideration has been given to whether the percentage should be a proportion of all uses in the centres (irrespective of their Use Class), this lowers the percentage of A1 uses considerably because of other uses which are commonly found in centres such as doctors surgeries, libraries, churches and community centres. These uses are D1 community uses and are very important within district and local centres but are protected under separate policies, which protect community facilities. It is proposed that the new Local Plan be much clearer in stating that the percentages are a proportion of the 'A' uses within the centre.

District Centres

11. This table shows % of A1 uses based upon total number of A1 to A5 units within the centre at ground floor level)

Centre	Type	No of units in 'A' classes	% A1
Arbury Court	D	16	69
Cherry Hinton High Street	D	28	64
Histon Road	D	9	78
Mill Road East	D	62	66
Mill Road West	D	77	65
Mitcham's Corner	D	53	57

The table includes vacant units recorded under the Use Class of the last known use. Those highlighted in grey are below 60%.

12. As demonstrated in the tables above, most of the district centres are still above 60% A1 uses, apart from Mitcham's Corner.
13. At Issues and Options 2 consultation, changes were suggested to the boundaries of some of the district centres, which lowered the percentage of A1 uses in some cases. See below for further details. It is for this reason, and to allow some flexibility in change of use that the policy seeks to maintain 55% A1 uses.
14. At this consultation Cambridge Leisure Park was proposed to be a District Centre. Evidence in the Retail and Leisure Study, and some of the representations received has led to the decision to designate just the shops and services fronting Hills Road and the supermarkets on the Leisure Park as a Local Centre, which is distinct to the leisure uses which make up the rest of the Leisure Park. It is proposed that this is renamed Hills Road/Cherry Hinton Road Local Centre.

Local Centres

15. This table shows % of A1 uses based upon total number of A1 to A5 units within the centre at ground floor level

Centre	Type	No of units in 'A' classes	% A1
Arbury Road/Milton Road	L	16	75
Barnwell Road	L	8	50
Cherry Hinton Road East	L	13	46
Cherry Hinton Road West	L	20	60
Hills Road	L	23	70
Hills Road / Cherry Hinton Road	L	15	53
Newnham Road	L	11	36
Trumpington	L	7	86

The table includes vacant units recorded under the Use Class of the last known use. Those highlighted in grey are below 60%.

Neighbourhood Centres

16. This table shows % of A1 uses based upon total number of A1 to A5 units within the centre at ground floor level

Centre	Type	No of units in 'A' classes	% A1
Adkins Corner	N	4	75
Akeman Street	N	4	75
Campkin Road	N	3	33
Chesterton High Street	N	18	67
Ditton Lane	N	5	80
Fairfax Road	N	3	100
Grantchester Street (Newnham)	N	6	100
Green End	N	4	75

Road			
King's Hedges Road	N	4	75
Norfolk Street	N	10	60
Victoria Road	N	20	55
Wulfstan Way	N	9	67
Carlton Way	N	3	67
Hawthorn Way	N	4	100

The table includes vacant units recorded under the Use Class of the last known use. Those highlighted in grey are below 60%.

17. The policy in the Cambridge Local Plan 2006 (6/7) requires that the proportion of A1 uses should not fall below 60% in the local centres and the majority are above this level. However, it has been found in the operation of this policy, that the use of percentages is difficult in the smaller centres, because the change in use of one unit has a much larger effect on the percentages than where there are a greater number of units, thus skewing the figures. For example, if there are 4 units in a centre, change of use of one of those units would have a 25% effect. It is for this reason that it is proposed to move away from the percentage based way of measuring the health of a local or neighbourhood centre, and to judge each application on the effect it will have on the vitality and viability of the centre as a whole based upon the mix and balance of uses.
18. The boundary of the Victoria Road Neighbourhood Centre has been changed since Issues and Options 2 consultation, to include the other centre uses which are dispersed along its length. Due to the dispersed nature of these uses, it is considered that Victoria Road is mainly providing for the needs of local residents and is still a neighbourhood centre. This will be shown on the Policies Map and the new calculation of number of units and proportion of A1 units is provided in the table above.

Evidence in draft Retail and Leisure Study Update (2013)

19. The Cambridge Retail and Leisure Study Update (2013) looks at the retail hierarchy (in Chapter 5) and states that there has been relatively little change in the overall health and retail composition of the District and Local Centres since the previous Retail and Leisure Study in 2008. The centres generally perform well against the national average in terms of their convenience goods and service provision and, with only a few exceptions, the centres generally have a low vacancy rate.
20. The study recognises that the City Council was looking at the potential to remove or reclassify certain centres and in some cases to redefine the centre boundary reflecting changes since the Cambridge Local Plan 2006. The study therefore makes recommendations for each centre and the justification behind

this. The study suggests that one option would be for the council to define a new tier of 'Neighbourhood Centres' to include the smaller centres which serve a more limited local catchment and perform more of a neighbourhood function. However, this change would be largely descriptive and in policy terms there would be little distinction in the approach taken to neighbourhood centres and local centres. The study goes on to say that irrespective of its definition, these centres should be protected to ensure that they continue to adequately meet the day-to-day needs of their immediate local catchment.

21. It is proposed that the hierarchy includes a new tier of neighbourhood centres in line with the recommendations of the draft Retail and Leisure Study update. Neighbourhood centres will be those centres where there are 6 or less retail units, or where the units are scattered along a road or embedded within residential areas and serving a limited catchment. The proposed policy treats local centres and neighbourhood centres in the same way, and as set out in the draft Retail and Leisure Study, this distinction is largely descriptive and a way of ordering the hierarchy.
22. The study also assesses the potential for new centres to be defined in the emerging Local Plan. The study looks at the potential for the Cambridge Leisure Park to function as a centre, and concludes that whilst leisure is the main function there are other town centre uses which are useful to current local residents and future residents in the proposed housing developments which will be coming forward in the area over the Plan period. As such they consider that there would be some merit in protecting both the retail and leisure uses in this location over the plan period.
23. The study recommends that there is scope for the Station Area to become a local centre and Carlton Way and Hawthorn Way to be designated neighbourhood centres. Also for new local centres to be defined in major planned residential development at the NIAB site and University of Cambridge site and a neighbourhood centre at the Clay Farm site.
24. The assessment in the Retail and Leisure Study Update (2013) has been used to guide the changes to the hierarchy from the previous Cambridge Local Plan 2006. There will be a policy, which defines the retail hierarchy in Section 2.

Issues and Options 2 Consultation

25. Consultation was carried out on whether some of the local centres should be reclassified as district centres i.e. Arbury Court, Cherry Hinton High Street, Histon Road (reclassified from local centres) and Cambridge Leisure Park (new classification). Also, changes to the boundaries of some of the district centres was proposed and shown on maps.
26. Consultation was also carried out on changes to the boundaries of some of the local centres and these were shown on maps. The boundary changes were

mainly to incorporate centre uses at the edge of current centres and to exclude uses that weren't centre uses (such as residential), but currently within local centres. Although only a small number of representations were received, these were generally in support of the changes proposed to the hierarchy and the boundaries proposed.

27. A comment was received that Mill Road should be considered as one centre and not split between Mill Road East and West. The centres have been historically treated as two centres because they are physically separated by the railway line. Policy 70 will look at the whole of Mill Road. However, for the purposes of this policy, keeping the centres separate seems logical due to the physical separation and because it will give more control over change of use, as the two different parts of Mill Road have different characteristics.
28. There was some objection to the inclusion of Cambridge Leisure Park as a district centre, because the balance of uses is not typical of a district centre, with it mainly having a leisure function and there was concern that policies may restrict its functioning. However, there was also support because the shops and other facilities at/near the Leisure Park are a very important resource for the increasing numbers of people who live reasonably close to the Park, and the very many who pass this spot on foot or bicycle every day and they should be protected. The supporting text of the proposed policy recognises that this district centre is different to the others and that A1 uses should be retained and encouraged in order to provide a complementary retail function alongside the leisure facilities.
29. There was also concern about the proposed boundary at Trumpington centre and that this should not be extended because the centre focuses on the crescent of shops. The extension proposed seems logical because it also includes other important community facilities for local people such as the village hall, doctor's surgery and a pub and would give these uses further protection. Another comment suggested that Waitrose should be included within the centre. Although Waitrose is considered edge of centre, it is not considered appropriate to provide additional protection for this use by including it within the local centre. If the foodstore was to relocate, due to the size of the site, another use such as housing may be more appropriate at this site rather than retail.
30. There was concern that the proposed extension to the district centre at No 1 Mitcham's Corner, would prejudice further development of the site for mixed use, but recognition that retail would be a suitable use on the frontage. It is proposed to maintain the extension to the centre proposed at Issues and Options 2, in order to recognise the council's desire that there be an active retail frontage. At this stage it would be too difficult to draw an alternative boundary on the map until planning permission has been granted for a use. However, the exact boundary can be refined in the next review of the Plan if development has taken place.

31. The final boundaries of the district, local and neighbourhood centres can be seen in Appendix G, and these will be included on the Local Plan Proposals Map.
32. Based upon these boundaries the proportion of A1 units in the district centres has been recalculated, as shown in the table below. This shows that two of the district centres have less than 60% A1 uses. It is therefore proposed that the percentage of A1 uses set out in the policy for district centres be 55%. This would provide some flexibility for change of use in the majority of the centres which would make them more resilient to market changes in line with the NPPF. However, it would still maintain retail as the predominant use.

District Centres including additional units identified in Plans

33. This table shows % of A1 uses based upon total number of A1 to A5 units within a frontage at ground floor level.

Centre	Type	No of units in 'A' classes	% A1
Arbury Court	D	16	69
Cherry Hinton High Street	D	31	58
Histon Road	D	9	78
Mill Road East	D	73	66
Mill Road West	D	79	62
Mitcham's Corner	D	56	57

Those highlighted in grey are below 60%

Findings of the Sustainability Appraisal of the Cambridge Local Plan (July 2013)

34. The findings of the Sustainability Appraisal of the draft Cambridge Local Plan undertaken in July 2013, were that overall the plan would lead to significant positive effects in terms of the following SA objectives:
- assist the creation and maintenance of inclusive, environmentally sustainable communities.
 - support Cambridge's vibrant and thriving centres, with a varied range of shopping facilities in accessible locations that meet the needs of people living, working and studying in, or visiting, the city and its wider sub-region.
 - be located to help minimise the distance people need to travel, and be designed to make it easy for everyone to move around the city and access jobs and services by sustainable modes of transport.

35. The appraisal noted that the level of retail development proposed and the hierarchical approach to retail development should protect the vitality and viability of the city centre and Mill Road into the future, leading to significant positive effects. It was also suggested that the policy could perhaps go further in terms of explicitly requiring that development proposals in the City Centre take into account and reflect identified needs associated with the local community.

Key Issues raised during Proposed Submission consultation

Policy 72: Development and change of use in district, local and neighbourhood centres.	
Total Representations: 9	
Object: 7	Support: 2
Objections	<ul style="list-style-type: none"> • Temporary use changes and flexibility of use zones would allow for more reactive, creative and entrepreneurial development and use of space in the city; • Part of the policy should be that enhancement of existing local and neighbourhood centres is essential in gaining permission for developments which will add to the population who would make use of these centres; • Recent planning policy towards change of use of premises in B1(a) office to C3 residential units should be addressed in this policy; • Should include provisions to protect the local businesses in Mill Road and Norfolk Street from the intrusion of chain stores; • Suitable uses at ground floor level as identified within the associated table in the policy are reasonable in most instances. However, some flexibility needs to be provided where redevelopment comes forward as mixed used developments on larger sites, where the ground floor uses whilst accommodating some retail could reasonably accommodate non-centre uses, particularly within sites in identified 'Opportunity Areas'; • Policy states that the change of use from A1 (shops) to A4 (pubs) is permissible but there is no mention that the conversion of some other A classes into pubs might also be permissible. This is an oversight that should be corrected; • The plan should provide for the retention of sufficient shops and services to allow residents to shop locally. The reduction in A1 uses in district centres from 60% of total shops to 55% is opposed; • The policy fails to address the 'mixed use' tactic employed by premises that only have retail permission but then add take away to their offering to get round the regulations and continue to be classified as shops.
Support	<ul style="list-style-type: none"> • No key issues.

Minor Modifications suggested following Proposed Submission consultation and implications for Sustainability Appraisal

36. No changes to Policy 72: Development and change of use in district, local and neighbourhood centres or the supporting text are suggested in the Addendum to the Cambridge Local Plan 2014: Proposed Submission document. There are therefore no impacts on the findings of the Sustainability Appraisal.

Policy 73: Community and Leisure Facilities

EXISTING POLICY TO BE REPLACED (CAMBRIDGE LOCAL PLAN 2006)	OPTION(S) BEING TAKEN FORWARD FROM THE ISSUES AND OPTIONS REPORT (2012) AND ISSUES AND OPTIONS 2 (2013)	OPTION(S) NOT BEING TAKEN FORWARD FROM THE ISSUES AND OPTIONS REPORT (2012)
<ul style="list-style-type: none"> • 5/11 Protection of Existing Facilities • 5/12 New Community Facilities • 5/13 Community Facilities in the Areas of Major Change • 5/14 Provision of Community Facilities Through New Development • 6/1 Protection of Leisure Facilities • 6/2 New Leisure Facilities 	<ul style="list-style-type: none"> • Option 168 Protection of existing leisure facilities • Option 169 new leisure facilities • Option 170 Protect existing community facilities • Option 176 New community facilities • Option 177 The provision of community facilities through development • Option 178 Support for arts and cultural facilities • Option 179 Sub-Regional Stadium • Option 180 – ice Rink • Option 181 – Concert hall 	

Key issues raised during Issues and Options (2012) and Issues and Options 2

(2013) consultations:

SECTION OF THE ISSUES AND OPTIONS REPORT (2012)	KEY ISSUES ARISING FROM CONSULTATION
Option 168: Protection of existing leisure facilities	<ul style="list-style-type: none"> • General support for the policy option; • Policy needs further clarification particularly in relation to the terms used. • Need to consider wider social and recreational needs of a community with consideration of accessibility; • Policy criteria should consider: <ul style="list-style-type: none"> ○ Stringent tests and consultation of existing and potential users of leisure facilities; ○ Facility use and reasons behind current performance; • Need to provide new leisure facilities in existing built-up areas; • No recognition that alternative uses outweigh retention of existing leisure facility; • Include sites on Community Asset Registers; • Growth must be accompanied with new leisure facilities; • Local need should not be defined by landowners and developers. Local opinions should take priority; • Contributions to support the new facilities are essential; • Increase access of sporting facilities owned by University, colleges and schools to the public.
Option 169: New leisure facilities	<ul style="list-style-type: none"> • General support for the policy option with some suggesting clarification; • Policy needs further clarification and clarification of the terms used; • Local people should be involved with the design and management of new facilities. Support for securing community use of sports facilities built on educational sites; • Need to clarify definition of leisure facilities; • Include sites on Community Asset Registers; • Assessment of the long-term viability of leisure facilities.
Option 170: Protection of existing community facilities	<ul style="list-style-type: none"> • Support for protecting community facilities; • Policy needs to enable new provision: • Include sites on Community Asset Registers with reference in Local Plan; • Need to take account of a balance between densification and local community needs;

SECTION OF THE ISSUES AND OPTIONS REPORT (2012)	KEY ISSUES ARISING FROM CONSULTATION
	<ul style="list-style-type: none"> • Consider extending the marketing period to 18 or 24 months; • The means of access to new facilities remains the same as the previous facility; • Policy needed to provide the planning criteria to assess proposals for new public houses and separate from Option 176 New Community Facilities; • More emphasis on venues for use by various age groups for community activities; • Support for community interaction; • Many different views on what should and should not be included in the definition of community facilities; • Definition should include community kitchens, swap shops, free shops, tool libraries, charity cafés, local shops and pubs, private huts and places of worship, affordable community dance halls, boat clubs; • Inclusion of educational facilities dependent on local needs; • Highways and private places made open to the public.
<p>Option 176: New community facilities Option 177: The provision of community facilities through new development</p>	<ul style="list-style-type: none"> • Option 176 and 177 are complimentary; • Relocation of hospice to Southern Fringe; • Shared facilities are not always possible due to conflicting demands and needs; • A new sixth form college needed in North West Cambridge; • Shortfall in the provision for climbing in Cambridge; • Support for a policy. • Lack of attention paid to existing deficits in community facilities; • Needs an option with more emphasis on making good shortfall in existing communities; • No reference to applications for entirely new public houses.
<p>Option 178: Support for arts and cultural activities</p>	<ul style="list-style-type: none"> • Support for this option but further clarification is required and real demand for venue exists; • Consider former public houses identified for redevelopment to be converted into arts and culture centres; • Theatres should not be included in a description of leisure facilities but in cultural facilities. Viability may apply to leisure facilities but not with the same weight for cultural facilities;

SECTION OF THE ISSUES AND OPTIONS REPORT (2012)	KEY ISSUES ARISING FROM CONSULTATION
	<ul style="list-style-type: none"> • This option should be linked to transport strategy; • Facilities need to be protected and enhanced as the sub-region expands; • Proven need is crucial; • Opportunity for a legacy building; • Designate Cultural Quarters; • Need an innovative arts and archive centre.
Option 179: A new Sub-regional stadium	<ul style="list-style-type: none"> • 119 out of 139 respondents to this question supported a new sub-regional stadium. Of the 119 supporters, 30% were Cambridge residents, with the remainder living outside the city. Many of the supporters appeared to be supporters of Cambridge United FC. The 20 objectors came from the following areas: 5 each from Trumpington & Grantchester; 7 from Cambridge & the remainder from Coton, Hauxton & Haslingfield. • Those supporting the proposed new sub-regional stadium also suggested a number of other sites for the delivery of the stadium, for example Cambridge East and NIAB. • Community Stadium would benefit the area; • Clear need for a Community Stadium ‘live entertainment’ facility with indoor training pitch and ancillary commercial space; • Shortfall in provision and support for a climbing wall; • Develop canoe trails and provision for canoeists; • Support for full size boating lake; • Many people supporting <ul style="list-style-type: none"> ○ Support the proposed 8-10,000 capacity stadium; ○ Support the venue to be suitable for other sports as well e.g. rugby and hockey. • Many people responding indicated that Abbey Stadium should not be retained citing reasons such as the lack of training facilities and poor transportation links. Site could provide much need housing. • Responses indicated that the development of Abbey Stadium for housing was conditional on: <ul style="list-style-type: none"> ○ Not causing further transport issues; ○ The area being enhanced; ○ Replacement sports facilities are provided and improved upon and with suitable affordable housing; ○ Replacement sports facilities are first provided; • Other responses to indicated that the development of

SECTION OF THE ISSUES AND OPTIONS REPORT (2012)	KEY ISSUES ARISING FROM CONSULTATION
	<p>Abbey Stadium should not include a supermarket or offices;</p> <ul style="list-style-type: none"> • No need for Cambridge to provide regional facilities; • Location of stadium at Trumpington Meadows is unsuitable mainly due to transport issues; • Stadium would alter the village character of Trumpington; • Location of stadium South of Cambridge unsuitable; • Abbey Stadium was supposed to provide a Community Stadium in 1999; • Community Stadium is unviable; • Loss of Green Belt; • Many people objecting suggested an alternate location including: <ul style="list-style-type: none"> ○ North of Marshalls; ○ Abbey Stadium; ○ Newnham; ○ Southern Fringe • Support the venue to be suitable for other sports as well e.g. rugby and hockey; • Abbey Stadium should be retained as a Community Stadium or as a community facility rather than high-density housing. CUFC should not move from the Abbey Stadium. Relocation may not overcome issues of congestion and parking in a residential area; • Developing Abbey Stadium for housing was not acceptable but retained/improved or it should be for another type of sports facility; • The proposal: <ul style="list-style-type: none"> ○ Conflicts with the definition given the commercial background of the project; ○ Lack sufficient parking; ○ Fail to take account of local communities and Trumpington's village setting; ○ Should be more inclusive e.g. facilities should permit amateur and recreational sport activities with less focus on football and open to other sections of the community; ○ Raises concern about the additional retail and housing; ○ Need to increase access for Cambridgeshire schools; • Grosvenor's proposals are unacceptable: <ul style="list-style-type: none"> ○ Increased traffic and parking congestion in the

SECTION OF THE ISSUES AND OPTIONS REPORT (2012)	KEY ISSUES ARISING FROM CONSULTATION
	<p>surrounding area and additional burden on Park and Ride;</p> <ul style="list-style-type: none"> ○ Increased burden on schools (new school at Trumpington Meadows cannot meet the additional need); ○ Significant additional erosion of the Green Belt; ○ Encroachment on the nature reserve at Byron's Pool; ○ Significant impact on the sustainability of neighbouring sports and social venues; ○ Significant additional strain on Parish of Haslingfield; ○ Reduction in quality of life of local residents caused by noise, light, traffic and litter from the venue. <ul style="list-style-type: none"> ● Alternative locations included Northstowe and Waterbeach, NIAB, Cambridge East, Cambridge Airport, University Site at Madingley Road, Newnham, Cowley Road
Option 180: Ice Rink	<ul style="list-style-type: none"> ● An ice rink would support sustainable communities; ● Need for an Ice Rink is economically viable and will improve Cambridge's sports facilities; ● Financial support available; ● No reasonable alternative to an ice rink; ● Proposal should form part of a general sports complex with good transport links, education and research facilities; ● Funding available, only a site is needed; ● Possible Locations: Not in the city, not Abbey Stadium, not North West Cambridge, cycling distance of the City Centre, West Cambridge, Science Park, near railway station, Abbey Stadium site, suburb / outskirts location with good transport links. ● Doubts over viability and therefore needs to be proven. : Ice rinks elsewhere have closed. Needs to be financially neutral; for Cambridge City Council and Council Tax payers; ● Ice rinks are environmentally unfriendly; ● Loss of Green Belt, congestion in and around Trumpington Park and Ride and Addenbrooke's.
Option 181: Concert Hall	<ul style="list-style-type: none"> ● Lack of large scale concert venue in Cambridge; ● Concert hall would be supported locally; ● Proposals should include a conference hall and multi-purpose venue; ● Should be large enough to cater for big London and

SECTION OF THE ISSUES AND OPTIONS REPORT (2012)	KEY ISSUES ARISING FROM CONSULTATION
	<p>international orchestras, touring opera and ballet companies, as well as high end artists and acts;</p> <ul style="list-style-type: none"> • Multi-purpose venue would be more viable; • Other existing venues could be better used; • Concert hall should be provided in collaboration with the University; • Replace Corn Exchange with concert hall; • Must be easily accessible/close to good transport links; • The Council must collaborate with neighbouring authorities to develop best solution for future and existing population. Community stadium, ice rink and concert hall proposals should not be considered in isolation; • Possible locations: Clay Farm, Station area, close to schools. Mill Road – the old Picture House, outside city boundaries; suburbs/outskirts location with good transport links; • Concert hall alone requires need/justification; • Multi-purpose venue to include conferencing and leisure more viable and will support Cambridge’s tourism and conferencing reputation; • Difficult to justify – other venues are available and there is insufficient demand to justify a purpose-built venue; • No need – Cambridge is already well served with suitable conference venues; • Loss of Green Belt, congestion in and around Trumpington Park and Ride and Addenbrooke’s.
NEW OPTIONS ARISING FOLLOWING COMMUNITY INVOLVEMENT	
No additional options have been suggested.	

Issues Raised to South Cambridgeshire District Council’s Issues and Options Consultation (2012) – Community Stadium

<p>Issues and Options 2012 Issue 84</p> <p>Issues and options 2013 (Joint) Questions 4 to 7</p>	<p>Community Stadium</p>
Key evidence	Major Sports Facilities Strategy for the Cambridgeshire Sub-

	<p>Region (Cambridgeshire Horizons 2005) Cambridge Community Stadium – Feasibility Study (Cambridgeshire Horizons 2007) Cambridge Sub-Regional Facilities Review (Cambridge City and South Cambridgeshire Councils 2012)</p>
Existing policies	None
Analysis	<p>The term ‘community stadium’ is used to describe a sports stadium facility that delivers amenities and services to local communities beyond its core operations. These may include health, leisure and general community provisions and/or sports and education facilities, as well as local retail and other local businesses. A community stadium also aims to be accessible to the local community at all times during the day and evening, on weekdays and weekends.</p> <p>The Councils individually sought views on whether a community stadium was needed in the Cambridge Sub Region in their 2012 issues and options consultations. Subsequently the Councils reviewed the evidence available, to explore whether there is a need for a community stadium and what a community stadium would encompass.</p> <p>The Cambridge Sub-Regional Facilities Review looked at previous studies that have identified the potential benefit to the Cambridge Sub-Region of a community stadium, meeting the needs of one or more of its major sports clubs and providing supporting facilities to local communities. A community stadium could raise the sporting profile of the area, whilst delivering a community hub through, for example, the provision of sports participation and other community accessible activities and/or local business engagement opportunities.</p> <p>Previous studies also suggest that Cambridge United FC would likely be the anchor tenant for a stadium of the scale envisaged (circa 10,000 seats). The existing Abbey Stadium site on Newmarket Road meets the current needs of Cambridge United, although the current facilities are not ideal for the club. The facilities at this site do not currently contribute to the broader range of activities that would be found in a community stadium facility.</p> <p>Given this situation, no specific need has been identified in the Cambridge Sub- Regional Facilities Review requiring the provision of a community stadium, and it concludes that whether there is considered to be a need for a community stadium to serve the Cambridge Sub-Region is a subjective issue. However, the Review identifies that the right package of uses in a suitable location could deliver benefits for the wider sub-region. It was determined that there should be further public</p>

	<p>consultation on this issue.</p> <p>Drawing on factors identified in the Review, the Councils identified principles for a community stadium that could be applied, and these were included in the Issues and Options 2013 consultation.</p> <p>To deliver a standalone stadium would require around 3 hectares but, for a community stadium with additional community and sporting facilities, a much larger site would be needed. Site options have been explored within Cambridge, on the edge of Cambridge and elsewhere. There are few sites of this scale available within the built up area of Cambridge. Outside Cambridge much of the land is in the Green Belt, which would preclude this type of development unless the need and benefit was such that it provided an exceptional circumstance to justify a review of the Green Belt through the Local Plan review.</p> <p>Following the first Issues and Options consultation, the Councils explored the potential of a range of site options to provide a community stadium as part of the Cambridge Sub-Regional Facilities Review, including a number of sites that were suggested in responses to the consultation. There are major issues associated with all site options and this may mean that some sites may not be capable of being delivered. However, was considered appropriate to consult on these options at this stage in the process before any decisions are taken on whether a community stadium should be provided and if so where. The view of the local community is an important step in the process. It is also recognised that for some site options, landowners may have different aspirations and we would encourage these to be made clear through the consultation before any decisions are taken. The consultation document highlights the advantages and disadvantages of each option to inform comment.</p> <p>It was highlighted that the Councils had not yet made a decision regarding the need for a site, and were not promoting a specific option, but sought views on potential options in order to inform decision making. Three potential sites were identified, within or on the edge of the city, which are outside the Green Belt, three on the edge of the City in the Green Belt, and three in planned or potential new settlements.</p>
Final Issues and Options Approaches	below.
Representations Received	<u>Issues and Options 1 (South Cambridgeshire)</u> Question 84:

- A) Is there a need for a community stadium? (S: 116, O: 13, C: 12)
- B) If there is a need, what type and size of facility should it be, and where is the most appropriate location? (S: 75, O: 19, C: 19)

Issues and Options 2 Joint Consultation

Paras 10.1 to 10.6 (Introduction – community stadium issues)
(S:106, O:9, C:15)

Paras 10.7 & 10.8 (Principles for a Community Stadium)
(S:58 O:5 C:2)

Question 4:

Do you think there is a need for a community stadium serving the sub-region?

(S: 384, O: 70, C: 131)

Question 5:

Do you agree with the principles identified for the vision for a community stadium? (S: 331, O: 33, C: 25)

Question 6:

If a suitable site cannot be found elsewhere, do you think the need is sufficient to provide exceptional circumstances for a review of the Green Belt to accommodate a community stadium? (S: 303, O: 62, C: 23)

Paras 10.9 to 10.13 (Potential Community Stadium Site Options)
(S:24 O:23 C:12)

Question 7:

Which if any of the following site options for a community stadium do you support or object to, and why? (S: 238, O: 27, C: 54)

Site Option CS1:

The Abbey Stadium and Adjoining Allotment Land, Newmarket Road, Cambridge

Support: 25 Object: 52 Comment: 16

(additional from Question 7: S:13, O:2 C: 8)

Site Option CS2:

Cowley Road Cambridge (former Park and Ride and Golf Driving Range)

Support: 25 Object: 32 Comment: 17

(additional from Question 7: S:8, O:0 C: 6)

	<p><u>Site Option CS3:</u> North of Newmarket Road, Cambridge East Support: 17 Object: 23 Comment: 15 (additional from Question 7: S:10, O:1 C: 6)</p> <p><u>Site Option CS4:</u> Land south of the A14 and west of Cambridge Road (NIAB3) Support: 8 Object: 190 Comment: 14 (additional from Question 7: S:2 O:7 C: 2)</p> <p><u>Site Option CS5:</u> Land south of Trumpington Meadows, Hauxton Road, Cambridge Support: 87 Object: 93 representations and a petition of 900 signatures submitted to City Council in 2012 Comment: 20</p> <p>(Total Individual representors from Q7 and CS5: Support: 291 Object: 106 Comment: 26)</p> <p><u>Site Option CS6:</u> Land between Milton and Impington, north of A14 (Union Place) Support: 11 Object: 46 Comment: 10 (Additional from Question 7: S:0 O:9 C: 1)</p> <p><u>Site Option CS7:</u> Northstowe Support: 11 Object: 37 Comment: 16 (additional from Question 7: S:1 O:6 C:6)</p> <p><u>Site Option CS8:</u> Waterbeach Town New Option Support: 13 Object: 34 Comment: 13 (additional from Question 7: S:3 O:5 C: 5)</p> <p><u>Site Option CS9:</u> Bourn Airfield New Village Support: 7 Object: 43 Comment: 10 (additional from Question 7: S:1, O:4 C: 4)</p>
Key Issues from Representations	<p>Question 84: Is there a need for a community stadium?</p> <p>Main Views Received:</p> <ul style="list-style-type: none"> • The area needs a first class stadium and sporting facilities that everyone can benefit from. • PMP 2006 report for Cambridge Horizons identified a gap

in sports provision within Cambridge Sub-Region.

- Shortage of readily accessible high quality sporting facilities – bulk of sports provision in the area is largely limited to University students and those at private schools.
- Would provide employment.
- Not fair on the majority who have no interest in football.
- New community stadium should include adequate facilities for active participation in sports and physical recreation by public and not simply be a venue for spectator sports.

If there is a need, what type and size of facility should it be, and where is the most appropriate location?

Main Views Received:

- Within cycling distance of City Centre.
- Support for Trumpington Meadows (75 representations) – good transport links, would not clog local streets, ability to support growing local community.
- Objection to Trumpington Meadows (20 representations) – Green Belt, Traffic congestion, park and ridge full on match days, fan base not local, unsustainable location, light and noise pollution.
- Northstowe / Waterbeach Barracks / Union Place.
- Not in A14 corridor.
- Athletics / hockey / football facilities.
- Sites amongst the population it is intended to serve.
- Should have a range of other facilities e.g. conference, restaurant, entertainment, facilities to support complimentary community projects.

Issues and Options 2 Joint Consultation

Question 4:

Do you think there is a need for a community stadium serving the sub-region?

Main Views Received:

- Widespread support for concept with a range of community sport facilities: Yes (65% of responses); No (19% of responses).
- 7% of responses specifically state not in Green Belt.
- Should be investment spread across a number of local sports facilities / community centres rather than one multi-purpose stadium.
- Would help to promote active lifestyles and a sense of

community.

- There is a shortage of all-weather pitches for the community and Cambridge needs a bigger indoor sports hall.
- Desirable, but cannot be considered as a need.
- Concerns about traffic impact if located at Trumpington Meadows.
- Undecided / not enough evidence there is or will be sufficient demand to make a facility viable.
- Public money or S106 funds should not be used for Cambridge United.

Question 5:

Do you agree with the principles identified for the vision for a community stadium?

Main Views Received:

- Widespread support for the principles: Yes (78% of responses); No outright (5% of responses); Partial agreement or other comment (17%).
- No necessity for a stadium to be combined with sports facilities for local residents.
- Full support for the principle that the stadium must be available for community use.
- The term 'community stadium' misrepresents what is being proposed as it would be a sub-regional venue rather than a facility for the community.
- The principles could make specific reference to other sporting needs, such as a lead climbing wall.
- Any site should be capable of expansion of both buildings and practice / playing areas in the longer term.
- Additional principles suggested:
 - Must have good strategic road access;
 - Must have sustainable transport links;
 - Must not have any substantial adverse effect on local community where it is based;
 - Must avoid adverse environmental impact;
 - Must maximise its return on investment for long term viability;
 - Must not be in the Green Belt;
 - Must be sited away from housing.

Question 6:

If a suitable site cannot be found elsewhere, do you think the need is sufficient to provide exceptional circumstances for a review of the Green Belt to accommodate a community

stadium?

Main Views Received:

- Need for Stadium and associated sports facilities outweigh Green Belt;
- Sites outside the Green Belt have considerable disadvantages compared to the Green Belt options;
- No exceptional circumstances, No specific need has been identified;
- Other options existing outside the Green Belt;

Site Option CS1: The Abbey Stadium and Adjoining Allotment Land, Newmarket Road, Cambridge

Key issues in representations:

Support:

- Existing site;
- Outside green belt;
- Central to Cambridge, accessible by public transport;
- Can relocate allotments;

Object:

- Traffic impact,
- Loss of allotments, an important local amenity;
- Not big enough to accommodate stadium;
- Better to use the site for housing;
- Environmental impacts on residential area
- Unclear how it would be funded.

COMMENTS:

- Would need a suitable location for replacement allotments;

Site Option CS2: Cowley Road Cambridge (former Park and Ride and Golf Driving Range)

Key issues in representations:

Support:

- Near new Station and guided bus;
- Brownfield land outside the Green Belt;

Object:

- Too Small;
- Poor road access, away from residential areas;
- Site will become high value, important for delivery of new mixed use employment area;
- City Council – Employment Development only

Site Option CS3: North of Newmarket Road, Cambridge East

Key issues in representations:

Support:

- Close to existing site & Park and Ride;
- Already removed from Green Belt;
- Good Access to A14;

Object:

- Marshalls - not available;
- Housing more important;
- Floodlighting not compatible with airport uses.
- Not clear how it would be funded;

Site Option CS4: Land south of the A14 and west of Cambridge Road (NIAB3)

Key issues in representations:

- Support:
- Close to A14

Object:

- Should be no further development on this land;
- Green Belt impact,
- Too small,
- Traffic congestion on A14
- Within Air quality management area;
- Land owner – not available

Site Option CS5: Land south of Trumpington Meadows, Hauxton Road, Cambridge

Key issues in representations:

Support:

- Good transport and road access,
- Would bring sporting and community benefits,
- Loss of Green Belt justified;
- Available (specific proposal submitted)

Object:

- Traffic Congestion and Parking;
- Inadequate infrastructure and public transport;
- Green Belt impact, Visual impact and harm to the edge of the City;
- Biodiversity impact;
- Conditional on development of 400 additional homes;

Site Option CS6: Land between Milton and Impington, north of A14 (Union Place)

	<p>Key issues in representations: Support:</p> <ul style="list-style-type: none"> • Close to CRC <p>Object:</p> <ul style="list-style-type: none"> • Poor access, too far and isolated from the City • Green Belt harm, coalescence with surrounding communities; • No justification for facilities; • Impact on Gypsy and Traveller site; <p><u>Site Option CS7: Northstowe</u> Key issues in representations: Support:</p> <ul style="list-style-type: none"> • Outside Green Belt, • Near Guided Bus <p>Object:</p> <ul style="list-style-type: none"> • Too far from City, • Impact on other uses • Endorsed DFD NAAP contains no provision for stadium/ conflict with other planning proposals/ better used for housing. <p><u>Site Option CS8: Waterbeach Town New Option</u> Key issues in representations: Support:</p> <ul style="list-style-type: none"> • Outside Green Belt, • Near Railway, • Support from landowners if need is established <p>Object:</p> <ul style="list-style-type: none"> • Too far from City; • Would not provide community hub for Cambridge; • Long lead in time. <p><u>Site Option CS9: Bourn Airfield New Village</u> Key issues in representations: Support:</p> <ul style="list-style-type: none"> • Outside Green Belt <p>Object:</p> <ul style="list-style-type: none"> • Too far from City • Lack of public transport • Land owner – not available
Preferred	Cambridge City Council and South Cambridgeshire District

<p>Approach and Reasons</p>	<p>Council do not consider that objective, up to date evidence of need for a community stadium has been demonstrated.</p> <p>A review of evidence (Major Facilities Sub Regional Facilities in the Cambridge Area - Review of Evidence and Site Options) concluded that demonstrable need is a subjective issue, and should be tested further through public consultation, particularly as public consultation did not form part of previous studies.</p> <p>There are potential benefits to a community stadium scheme, highlighted by the studies, but the Councils have to make a judgement whether the need has been demonstrated, and in particular whether need is sufficient to provide exceptional circumstances for a review of the Green Belt. It is not considered that the need is sufficient to justify a Green Belt review, particularly given the harmful impacts identified of the sites tested.</p> <p>Through the plan making process the Councils sought to identify potential site options that could accommodate a community stadium. A range of options were considered before 9 options were identified. Two sites were suggested to the Council were included in the public consultation. All presented significant challenges, and were published for consultation highlighting these difficulties.</p> <p>Only three potential sites of the scale required were identified in Cambridge. The potential for the existing Abbey Stadium site to be enlarged to accommodate a Community Stadium was explored, which would require development of a significant area of established allotments. Although these could potentially be replaced elsewhere, this would likely to be on the edge of the City, a significant distance from the current site. Allotments are in high demand, and this site is particularly accessible to a large residential area. The current Cambridge Local Plan protects allotments. The need for a stadium does not appear to be sufficient to warrant their loss.</p> <p>The former park and ride site at Cowley Road could potentially be big enough to provide a standalone stadium, although it would have limited accessibility to residential areas. The importance of this area as a mixed use employment led development, utilising opportunities provided by the new railway station and links to the guided busway has been highlighted elsewhere in the plan. The landowner has highlighted their intention to support this vision. The site is therefore not considered available for this use.</p> <p>The land north of Newmarket Road, removed from the Green Belt through the last round of plan making as part of Cambridge</p>
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	<p>East was also explored. The land owner has indicated that they do not consider the land available or suitable for this use. They intend to bring forward the site for residential development.</p> <p>The City of Cambridge is surrounded by Green Belt, the purpose of which includes to protect the setting of the historic city. Green Belt would preclude this type of development unless the need was sufficient to provide exceptional circumstances to justify a review.</p> <p>Two sites were submitted through representations proposing sites in the Green Belt. In both of these cases the Green Belt Study (2012) demonstrates the significant harm to the purposes of the Green Belt that would result from further development in these locations. Although support was demonstrated through representations to the issues and options report, there was also a considerable level of objection to specific proposals, and through the wider issues and options consultation, to further development in the Green Belt.</p> <p>North of the A14, Leonard Martin proposed a site between Histon and Milton (referred to as Union Place) large enough to accommodate a range of facilities. The representations proposed a community stadium with 10,000 seat capacity, a concert hall, and ice rink, and a large and high quality conference centre and an adjoining extended hotel. This scale of development, breaching the line of the A14, would cause significant harm to the purposes of the Green Belt, particularly resulting in greater risk of coalescence with the nearby villages. It has not been demonstrated that the package of proposals would function and be delivered, or how the significant transport and accessibility constraints of the site could be overcome.</p> <p>A site south of Trumpington Meadows was proposed by Grosvenor, who own the Abbey Stadium site. They consider they have the only deliverable and viable proposal, and represents a good fit to the opportunities identified in the PMP study that a community stadium could provide. It includes additional indoor and outdoor sports facilities. The proposal includes 400 homes, which the developer considers necessary to enable delivery.</p> <p>When the adjoining Trumpington Meadows site was removed from the Green Belt, the scale of the site was determined to be the most that could be developed without causing major harm to the purposes of the Cambridge Green Belt and required the creation of a new high quality urban edge and distinctive gateway development. Extending the urban edge further south would cause the City to extend as far as the M11 motorway and</p>
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thus negatively impact on the compact nature of the City and its setting. Development on this site would link physically and visually with that at Trumpington Meadows and Glebe Farm. It would extend the urban edge down a visually exposed southwest facing slope to meet the M11 corridor. It would extend the City southwest in the form of an isolated promontory. The land adjoining the Trumpington Meadows development has been designed to achieve a soft green complementing a new and distinctive urban edge. Development of a stadium would form a new edge against the M11 blocking views to townscape and landscape. The development would have a severe adverse impact on the setting of the City, and on the purposes of Green Belt in terms of openness and setting of the City.

Additional information would be required to demonstrate transport impacts can be addressed. This includes interaction with the Park and Ride site. Liaison with police on traffic and crowd management, and public safety issues will be required. The Police Architectural Liaison Officer advises that issues have not been addressed to their satisfaction, and they therefore maintain an objection at this stage. The stadium proposal is accompanied by a proposal for 400 dwellings, to make the site viable. Evidence has not been submitted to justify why this level of accompanying development is needed.

A third site in the Green Belt was tested, north of the site removed from the Green Belt for development through the last plan review between Huntingdon Road and Histon Road Cambridge. This also presented development challenges that would be difficult to overcome, but in addition the landowner has clarified through the consultation that the site is not available for this use.

Away from Cambridge new settlement options were explored. Northstowe has progressed too far to include proposals, and the land area in the town is needed to achieve the level of planned development. The owners of Bourn airfield have clarified their site would not be available for this use. The promoters of the Waterbeach New Town stated that if there was a demonstrable need, provision could be explored, but this would be a longer term option, as most of the town is anticipated to come forward after 2031.

Other promoters of new or expanded new settlements have stated that their sites could be available for this use. These sites have not been identified in the draft plan, and the potential to include a stadium does not justify a change to this approach.

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Evidence base:

- Cambridgeshire Horizons (2006). An Arts and Culture Strategy for the Cambridge Sub-Region;
- Cambridgeshire Horizons (2006). Balanced and Mixed Communities: A Good Practice Guide;
- The Cambridgeshire Together Board. Cambridgeshire Vision: County-wide Sustainable Community Strategy 2007–2021;
- Cambridge City Council (2007). Cambridge Sustainable Community Strategy (2007);
- Cambridgeshire Horizons (2008). A Major Sports Facilities Strategy for the Cambridge Sub-Region;
- Cambridgeshire Horizons (2008). The Cambridgeshire Quality Charter for Growth;
- GVA Grimley (2008). Cambridge Sub-Region Retail Study, Vol. One: Report and Plans;
- Cambridge City Council (2009). Cambridge Sports Strategy 2009 – 2013;
- Cambridge City Council (2012). Local Leisure Facilities Survey;
- GVA Grimley (2013). Retail and Leisure Study Update.

How the policy came about:

37. The National Planning Policy Framework is supportive of the development of policies that support the viability of town centres and provide a balance of land uses within local authority areas to encourage people to minimise journey lengths for leisure pursuits, amongst other uses, increasing opportunities for interaction between members of the community who might not otherwise meet. Paragraph 70 of the National Planning Policy Framework sets out the need for planning policies to plan positively for the provision and use of shared spaces and community facilities. It also sets out the importance of guarding against the unnecessary loss of valued facilities and services.
38. Policy 73 represents a combination of a number of options consulted on during the Issues and Options consultation (2012), notably:
 - Option 168: Protection of existing leisure facilities
 - Option 169: New leisure facilities
 - Option 170: Protection of existing community facilities
 - Option 176: New community facilities; and
 - Option 177: The provision of community facilities through new development; and
 - Option 178: Support for arts and cultural activities

Protection of existing leisure facilities

39. On the issue of the protection of existing leisure facilities (Option 168 of the Issues and Options Report), there was general support for the continuation of such a policy approach, and this has been carried forward into Policy 73. This element of the policy will be applicable to all leisure facilities including arts and cultural proposals, local and sub-regional facilities. The interim Sustainability Appraisal was supportive of the need to protect existing leisure facilities, noting that the impact of any new facilities will need to be assessed to ensure they complement and not compete with the city centre (assuming they are located outside the centre), to ensure the centre's vitality and vibrancy will not be adversely affected. This approach is consistent with the National Planning Policy Framework.
40. Protecting leisure facilities should help protect and enhance leisure facilities and is also likely to help improve the health and wellbeing of residents. In addition it should contribute to reducing inequalities in health through improved accessibility. Providing protection to leisure facilities will also help address the potential loss of these to alternative development.
41. Sport England suggested that the definition of 'Leisure facilities' be tightened with regard to sports facilities. The reference to 'peak period' - for indoor sports facilities and outdoor intensive use facilities (e.g. floodlit all-weather pitches) is usually defined as weekday evenings as well as the weekend. An explanation of what was meant by 'peak period' for different leisure facilities was included in the 'Marketing, Local Needs Assessment and Viability Appraisal' guidance in the draft Local Plan's appendices.
42. The references to sub-regional facilities need to demonstrate more than a local need as they would probably serve more than just the immediate Cambridge area. They would need to be justified in the strategic context also. Policy 73 includes a requirement for city-wide and sub-regional community and/or leisure facilities demonstrated that the need for the proposal within the catchment area existed within the area it was expected to serve.

New leisure facilities

43. Policy 73 also sets out the approach that should be taken in relation to the provision of new leisure facilities. This was considered in Option 169 of the Issues and Options Report (2012), and received general support during consultation, subject to clarification as to the definition of leisure uses, which has now been provided as part of the supporting text to the policy.
44. The Interim Sustainability Appraisal noted that supporting new and improved leisure facilities, as proposed in Option 169, will have benefits for communities and wellbeing, and improve accessibility and help reduce inequalities in health within Cambridge. By ensuring new facilities are to be an appropriate scale to

the locality will help ensure the scale of development is sensitive to character and distinctiveness of that local area and help protect the city's townscape.

45. The draft Cambridge Retail and Leisure Study Update (2013) looked at leisure provision in Cambridge and noted the market decline in snooker and bingo and rise in eating out, health and fitness and children's indoor play. It also noted that many new D2 (leisure) uses such as modern bingo halls, multiplex cinemas, ten-pin bowling, larger health and fitness clubs, larger children's play centres and concert halls were unlikely to be able to find space large enough for their formats within Cambridge city centre or other existing district and local centres in the area.
46. The report recommended that leisure policies benefit from some updating to encourage the retention of existing, and encourage new, leisure space. Any policy or text which protects D1 (community facilities) floorspace should also allow for their conversion to, or dual use as, performance and other cultural D2 space where appropriate. Given the strength of the city centre, there was insufficient evidence to support a blanket locally set threshold different to that set out within the National Planning Policy Framework (i.e. 2,500 m²).

Protection of existing community facilities

47. In light of the requirements of the National Planning Policy Framework in relation to guarding against the unnecessary loss of valued facilities, policy 73 also gives consideration to the protection of existing community facilities. During the Issues and Options (2012) consultation, the protection of existing community facilities (Option 170) was supported. Some concerns were raised, including the need to have a balance between intensification of facilities and local community needs. It was considered that any marketing period should be between 18 and 24 months. Access was also another issue raised and that access to new facilities remains the same as the previous facility. Comments placed particular emphasis on venues for use by various age groups for community activities. There was support for community interaction.
48. There were many different views on what should and should not be included in the definition of community facilities. Clarification has now been provided as to what constitutes a community facility as part of the supporting text of the policy. A number of concerns were raised regarding existing deficits in community facilities with a need to improve existing communities facilities. It was also noted that shared facilities are not always possible due to conflicting demands and needs of community users. The supporting text for community facilities highlights the importance of these facilities and that new and replacement facilities support both existing and new communities with sufficient capacity to accommodate community need and demand. These facilities should be, as far as reasonable and where possible, multi-functional.

49. The interim Sustainability Appraisal considered Option 170 would ensure continued protection of existing community facilities and contribute significantly to addressing key community health and wellbeing issues. Only where comprehensive evidence is demonstrated would this option allow redundant community facilities to be redeveloped into other uses. This should minimise any potential adverse impact on local communities and add another level of protection against the loss of community facilities to other uses. The protection of existing facilities should help reduce the need for people to travel and enabling more people to access facilities by walking and cycling. As such, Option 170 has been carried forward into Policy 73.

New community facilities and the provision of community facilities through new development

50. Policy 73 also gives consideration to the development of new community facilities and the provision of community facilities through new development.
51. As part of the process of drafting Policy 73, the Head of Community Development and Development Management were consulted with particular regard to the way in which small-scale (and often much lower rental value) community facilities can be provided onsite. The issue related to encouraging local community groups to manage the day-to-day running of small community rooms. These are often marketed as community facilities with community groups unable to compete with higher value community facilities such as dental practices or shops.
52. The policy would require the community space to be marketed to community groups at a commensurate price/rental charge. The policy would allow, through a S106 (legal) agreement a community enterprise to operate that generates income support and provides the day-to-day management of the community room. This should encourage the use of the community space in a sustainable manner.
53. The definition of Community Facilities has now been clarified with a proposed categorisation of facilities based upon location and the area a facility may generally serve. The categorisations should allow for more comparable replacement community facilities to be provided.
54. The interim Sustainability Appraisal considered the impact of Option 176 (new community facilities) on key issues relating to landscape and biodiversity as uncertain and would be dependent on a site-by-site basis. Enforcing the provision of community facilities through development (Option 177) may be a more certain method of delivery, as new facilities would be required where development leads to an increased demand for community facilities. However the timeframe for delivery may be longer than option 176. Conversely, provision through development may overlook areas in need that do not attract new development.

Support for arts and cultural activities

55. Leisure facilities in the draft plan are defined under three broad categories: 'Sports', 'Arts and Culture' and 'Entertainment'. Arts and cultural facilities will therefore be protected and supported under Policy 73. It should be noted that during the Issues and Options consultation the Theatres Trust explained that for cultural facilities that received subsidies the marketing requirement is not a suitable means of testing viability. Facilities that receive subsidies will therefore be exempt from any marketing requirement and referenced in the 'Marketing, Local Needs Assessment and Viability Appraisal' guidance in the draft Local Plan's appendices.
56. Other comments received during the public consultation included general support for Option 178 however further clarification is required and real demand for venue exists. Another idea suggested that public houses identified for redevelopment to be converted into arts and culture centres. Theatres should not be included in a description of leisure facilities but in cultural facilities. Viability may apply to leisure facilities but not with the same weight for cultural facilities. Option 178 should be linked to transport strategy. Facilities need to be protected and enhanced as the sub-region expands. Proven need for facilities is crucial. Policy 73 requires new facilities to improve the range, quality and accessibility of facilities and demonstrate a local need for the proposed facilities. Other comments referred to the opportunity for a legacy building to be taken as should the designation of a Cultural Quarters. While no specific legacy proposal has been brought forward, Policy 73 supports new Arts and cultural facilities. The designation of a Cultural Quarter was not considered practical given the broad dispersal of Arts and cultural facilities across the city. Furthermore, due to the limited number of potential sites in the city for new facilities such a designation could further restrict new Arts and cultural facilities coming forward.
57. The Interim Sustainability Appraisal noted that Option 178, in maintaining facilities to support art and cultural activities, would help Cambridge retain its position as an important cultural centre. This is likely to have a positive effect on the growth of tourism in the city. Enhancing existing facilities and supporting new opportunities for facilities will also contribute positively to the quality and vitality of the city centre.

Sub-regional facilities

58. On the matter of having a specific sub-regional facility policy, it was considered from the various representations submitted that a need for a specific sub-regional facility policy had not been proven. Specifically, for the Community Stadium, no suitable site had been identified for the relocation of the existing facilities. For this reason no specific policy was taken forward, however it was considered reasonable, given the likelihood of a regional size proposal being

submitted over the plan period, to include specific criteria in the ‘Community and Leisure Facilities’ policy for city-wide and sub-regional facilities. These should ensure that proposals are located in accordance with the National Planning Policy Framework’s sequential approach and that a clear need for the facility has been demonstrated. The criteria would require evidence that the proposal would not have a negative impact on the city centre and that opportunities to maximise access to facilities for the wider community were maximised.

Findings of the Sustainability Appraisal of the Cambridge Local Plan (July 2013)

59. The findings of the Sustainability Appraisal of the draft Cambridge Local Plan undertaken in July 2013, were that overall the plan would lead to significant positive effects in terms of the following SA objectives:
- assist the creation and maintenance of inclusive, environmentally sustainable communities.
 - support Cambridge’s vibrant and thriving centres, with a varied range of shopping facilities in accessible locations that meet the needs of people living, working and studying in, or visiting, the city and its wider sub-region.
 - be located to help minimise the distance people need to travel, and be designed to make it easy for everyone to move around the city and access jobs and services by sustainable modes of transport.
 - promote social cohesion and sustainability and a high quality of life by maintaining and enhancing provision for open space, sports and recreation, community and leisure facilities, including arts and cultural venues that serve Cambridge and the sub-region
 - promote a safe and healthy environment, minimising the impacts of development and ensuring quality of life and place.
60. The appraisal noted that Policy 73 should have the effect of ensuring that facilities come forwards in areas of deficiency and, hence, should help to ensure that high quality facilities are ‘accessible’. In addition, this Policy sets out criteria relating to the loss of facilities. These state that the loss of a facility or site last in use as a community facility or leisure facility will be permitted only if it can be suitably replaced or relocated, or is no longer needed; so providing a high degree of protection.

Key Issues raised during Proposed Submission consultation

Policy 73: Community, sports and leisure facilities	
Total Representations: 33	
Object: 25	Support: 8
Objections	<ul style="list-style-type: none"> • Plan should support a Community Stadium; • Site for a Community Stadium should be allocated to minimise risk and uncertainty;

	<ul style="list-style-type: none"> • Site for an ice rink should be allocated; • Requirement for on-site provision should be stronger; • Definition of community facilities should be simplified and modified to include waste management services; • Requirement for Health Impact Assessments policy; • No specific reference to faith communities, their needs and faith facilities; • Revitalise the Howard Mallett Centre and not for office use or student accommodation; • Disabled access requirement for facilities.
Support	<ul style="list-style-type: none"> • No Community Stadium should be built on Green Belt; • Multi-functional facilities.

Minor Modifications suggested following Proposed Submission consultation and implications for Sustainability Appraisal

61. No changes to Policy 73: Community, sports and leisure facilities or the supporting text are suggested in the Addendum to the Cambridge Local Plan 2014: Proposed Submission document. There are therefore no impacts on the findings of the Sustainability Appraisal.

Policy 74: Education facilities

EXISTING POLICY TO BE REPLACED (CAMBRIDGE LOCAL PLAN 2006)	OPTION(S) BEING TAKEN FORWARD FROM THE ISSUES AND OPTIONS REPORT (2012) AND ISSUES AND OPTIONS 2 (2013)	OPTION(S) NOT BEING TAKEN FORWARD FROM THE ISSUES AND OPTIONS REPORT (2012)
Not applicable	Not applicable	Not applicable

Key issues raised during Issues and Options (2012) and Issues and Options 2 (2013) consultations:

Not applicable (the policy on education facilities was developed in response to representations received from Cambridgeshire County Council).

Evidence base:

- Collaboration with the County’s Children and Young People’s Services

How the policy came about:

62. Paragraph 37 of the National Planning Policy Framework supports a balanced approach towards the provision of different uses to minimise journey lengths, including education. In addition, paragraph 72 supports a proactive, positive and collaborative approach to providing a range of education facilities in order

to provide local people with a wide choice in education. The policy is needed because it is important that there is sufficient infrastructure to support both existing and new growth in Cambridge. This includes infrastructure for educational facilities. The policy should ensure the provision of high quality education facilities for young people in highly accessible locations.

63. While no specific option was consulted upon during the Issues and Options' (2012) consultation, comments were received from the County Council during the Issues and Options 2 Consultation. Their comments highlighted the needs and demands on education facilities with the proposed level of growth.
64. A draft policy was sent to the County's Children and Young People's Services, responsible for new education facilities in Cambridgeshire. Their comments referred to: a revised definition of education facilities; the necessity for local need to be taken into account when assessing proposals for education facilities; new education facilities should be appropriately located; the need to mitigate impact of any associated residential development; and comply with the strategic objectives of the Children's Services Authority. Developers should engage with the service at the earliest opportunity and work cooperatively to ensure the phasing of residential development and appropriate mitigation is identified in a timely manner to ensure appropriate education provision can be secured. These comments were applied to the policy.
65. Further comments were provided on the draft supporting text and were applied. These included the statutory role of the local Children's Services Authority and their adopted principles that underpin commissioning school places.
66. In terms of primary education, information was provided about recent education facilities projects and their on-going work with education providers. This work includes identifying additional places needed to address existing and future basic educational need requirements across the city.
67. In terms of secondary provision, there is significant pressure on existing secondary capacity in the city, as a result of recent housing development and demographic changes. Cambridgeshire County Council is working with Cambridge's education providers to identify options for increasing capacity in the city up to 2018 with the secondary school in Trumpington scheduled to open in September 2015. From 2018, there is forecast to be further significant pressure on places. Cambridgeshire County Council will, in partnership with existing providers undertake an extensive review of provision post-2018 to identify appropriate solutions for securing the additional capacity required. These comments were applied to the supporting text. Cambridge City Council is currently working with the County's Children and Young People's Services at Cambridgeshire County Council and South Cambridgeshire District Council.

68. Guidance was sought over the issue of over-coming conflicting policies, for example open public space on school sites. Policy 67 allows the loss of protected open spaces in school grounds in order to meet a demonstrable educational need without adversely affect playing field provision on the site.
69. The interim Sustainability Appraisal has not assessed this policy option, as it was not included in the Issues and Options document. However, the provision of educational facilities is considered to be a highly sustainable option because these will support the social role of sustainable development.

Findings of the Sustainability Appraisal of the Cambridge Local Plan (July 2013)

70. The findings of the Sustainability Appraisal of the draft Cambridge Local Plan undertaken in July 2013, were that overall the plan would lead to significant positive effects in terms of the following SA objectives:
 - be located to help minimise the distance people need to travel, and be designed to make it easy for everyone to move around the city and access jobs and services by sustainable modes of transport.
 - promote social cohesion and sustainability and a high quality of life by maintaining and enhancing provision for open space, sports and recreation, community and leisure facilities, including arts and cultural venues that serve Cambridge and the sub-region
 - promote a safe and healthy environment, minimising the impacts of development and ensuring quality of life and place.
71. The appraisal noted that Policy 74 should have the effect of ensuring that appropriate education provision is secured with positive effects. However, given the importance of such facilities to community and wellbeing, it is suggested that this Policy could be strengthened by including specific reference to their protection from re-development (in a way that supplements Policy 73). Policy 73 requires the loss of facility or site that was last in use as a community, sports or leisure facility will only be permitted if it is demonstrated: the facility can be replaced within the new development or relocated to at least its existing scale, range, quality and accessibility for its users; or the facility is no longer needed. It was considered that this section of Policy 73 was sufficient to ensure that education facilities were properly safeguarded. They would either be replaced in a satisfactory manner or re-developed; where it could be proved that the facilities were no longer needed following the guidance contained in Appendix K of the draft Local Plan.

Key Issues raised during Proposed Submission consultation

Policy 74 : Education facilities	
Total Representations: 7	
Object: 4	Support: 3
Objections	<ul style="list-style-type: none"> • Use infill/brownfield sites for new schools and not just housing; • School provision not addressed in the plan along with wider provision of infrastructure. Site(s) for new schools should be included; • Policy 74 conflicts with Policy 67: Protection of open space; • New education facilities should ensure satisfactory access for disabled people.
Support	<ul style="list-style-type: none"> • Schools should be located in the area that they serve.

Minor Modifications suggested following Proposed Submission consultation and implications for Sustainability Appraisal

72. No changes to Policy 74: Education facilities or the supporting text are suggested in the Addendum to the Cambridge Local Plan 2014: Proposed Submission document. There are therefore no impacts on the findings of the Sustainability Appraisal.

Policy 75: Healthcare facilities

EXISTING POLICY TO BE REPLACED (CAMBRIDGE LOCAL PLAN 2006)	OPTION(S) BEING TAKEN FORWARD FROM THE ISSUES AND OPTIONS REPORT (2012) AND ISSUES AND OPTIONS 2 (2013)	OPTION(S) NOT BEING TAKEN FORWARD FROM THE ISSUES AND OPTIONS REPORT (2012)
Not applicable	Not applicable	Not applicable

Key issues raised during Issues and Options (2012) and Issues and Options 2 (2013) consultations:

Not applicable (the policy on education facilities was developed in response to representations received from NHS Cambridgeshire.

Evidence base:

- Collaboration with the NHS Property Company and the Cambridgeshire Association to Commission Health (CATCH) Local Commissioning Group (LCG)

How the policy came about:

73. Paragraph 37 of the National Planning Policy Framework supports a balanced approach towards the provision of different uses to minimise journey lengths.

Paragraph 70 states that planning policies should plan positively for the provision and use of social facilities. This includes healthcare.

74. The policy is needed because it is important that there is sufficient infrastructure to support both existing and new growth in Cambridge. This includes infrastructure for healthcare facilities. The policy should ensure the provision of high quality healthcare facilities in highly accessible locations. While no specific option was consulted on during the Issues and Options' (2012) consultation, comments were received from the NHS Cambridgeshire during the Issues and Options Consultation. Their comments highlighted the need to reduce health inequalities.
75. A draft policy was sent to the NHS Property Company and a representative of Cambridgeshire Association to Commission Health (CATCH) Local Commissioning Group (LCG) both of whom represented the now disbanded Cambridgeshire Primary Care Trust, which had responsibility until 1 April 2013 for new healthcare facilities in Cambridgeshire. Their comments on the draft policy related to the definition of health-care facilities and the need for vehicular access to healthcare facilities. They had no specific request for changes to the draft supporting text other than to say that the Cambridgeshire and Peterborough Shadow CCG was now authorised.
76. The Sustainability Appraisal has not assessed this policy option, as it was not included in the Issues and Options document. However, the provision of healthcare facilities is considered to be a highly sustainable option because these will support the social role of sustainable development.
77. The Cambridgeshire Joint Strategic Needs Assessment (JSNA) is the means by which local authorities, Primary Care Trusts and local partners describe the future health, care and wellbeing needs of the local populations and to identify the strategic direction of service delivery to meet those needs. While there is currently no identified healthcare facility expansion, it is envisaged that the LCGs related to Cambridge and the NHS Property Company will develop their facility requirements.

Findings of the Sustainability Appraisal of the Cambridge Local Plan (July 2013)

78. The findings of the Sustainability Appraisal of the draft Cambridge Local Plan undertaken in July 2013, were that overall the plan would lead to significant positive effects in terms of the following SA objectives:
 - be located to help minimise the distance people need to travel, and be designed to make it easy for everyone to move around the city and access jobs and services by sustainable modes of transport.
 - promote social cohesion and sustainability and a high quality of life by maintaining and enhancing provision for open space, sports and

recreation, community and leisure facilities, including arts and cultural venues that serve Cambridge and the sub-region

- promote a safe and healthy environment, minimising the impacts of development and ensuring quality of life and place.

79. The appraisal noted that Policy 75 should have the effect of ensuring the development of additional health infrastructure that benefits all members of local communities, resulting in positive effects. However, given the importance of such facilities to community and wellbeing, it is suggested that this Policy could be strengthened by including specific reference to their protection from re-development (in a way that supplements Policy 73). Policy 73 requires the loss of facility or site that was last in use as a community, sports or leisure facility will only be permitted if it is demonstrated: the facility can be replaced within the new development or relocated to at least its existing scale, range, quality and accessibility for its users; or the facility is no longer needed. It was considered that this section of Policy 73 was sufficient to ensure that healthcare facilities were properly safeguarded. They would either be replaced in a satisfactory manner or re-developed; where it could be proved that the facilities were no longer needed following the guidance contained in Appendix K of the draft Local Plan.

Key Issues raised during Proposed Submission consultation

Policy 75: Healthcare facilities	
Total Representations: 5	
Object: 4	
Support: 1	
Objections	<ul style="list-style-type: none"> • Extend policy to work with other NHS organisations that have a land planning role; • Site for a replacement Arthur Rank Hospice should be allocated; • Medical facilities provision not addressed in Plan along with wider provision of infrastructure; • New medical facilities should ensure satisfactory access for disabled people.
Support	<ul style="list-style-type: none"> • Co-location of facilities.

Minor Modifications suggested following Proposed Submission consultation and implications for Sustainability Appraisal

80. As a result of assessment, two minor modifications are suggested for Policy 75: Healthcare facilities and paragraph 8.35 of the supporting text. Both changes are in the Addendum to the Cambridge Local Plan 2014: Proposed Submission document marked as PM/8/001 and PM/8/002.
81. In response to a representation (Representation Number 27573) and for clarity, PM/8/001 suggests that Policy 75's second paragraph should be amended to read:

“The council will work with Local Commissioning Groups, the NHS Property Company and NHS England, or their successors, to provide high quality and convenient local health services in all parts of Cambridge, but particularly in areas of population growth.”

82. PM/8/002 suggests that the whole of paragraph 8.35 of the plan is deleted as it could easily become out of date and is not necessary.
83. Following consideration of the impact of these changes on the Sustainability Appraisal Framework, it has been concluded that these changes do not materially alter the findings of the Sustainability Appraisal.

Policy 76: Protection of Public Houses

EXISTING POLICY TO BE REPLACED (CAMBRIDGE LOCAL PLAN 2006)	OPTION(S) BEING TAKEN FORWARD FROM THE ISSUES AND OPTIONS REPORT (2012) AND ISSUES AND OPTIONS 2 (2013)	OPTION(S) NOT BEING TAKEN FORWARD FROM THE ISSUES AND OPTIONS REPORT (2012)
Not applicable	<ul style="list-style-type: none"> • Option 173 Safeguarding public houses • Option 175 - Allow the flexible reuse of public houses 	<ul style="list-style-type: none"> • Option 171 Public houses: Market led approach • Option 172 Protection for all public houses • Option 174 – Extend the safeguarding option (173) to former public houses

Key issues raised during Issues and Options (2012) and Issues and Options 2 (2013) consultations:

SECTION OF THE ISSUES AND OPTIONS REPORT (2012)	KEY ISSUES ARISING FROM CONSULTATION
Public Houses – general comments	<ul style="list-style-type: none"> • Public houses are vital to the vitality of the high street. The change of use for pubs needs to be stopped; • Support for and against protecting public houses; • Need to protect public house gardens; • Failure to reflect community and historical value of pubs regarding their replacement; • More positive approach should be adopted; • Facilitate restaurant in former pubs becoming pubs against instead of alternative uses.

SECTION OF THE ISSUES AND OPTIONS REPORT (2012)	KEY ISSUES ARISING FROM CONSULTATION
Option 171 - Public Houses: Market led approach	<ul style="list-style-type: none"> • With this option, there would be no clear means by which developers could establish that the premises were not viable as a pub business; • If business was truly viable then it would not be up for closure – protection of some public houses would be futile; • Pubs represent important community facilities and must be protected; • Pubs need to be given a chance to be viable – market forces can be variable.
Option 172 - Protection for all Public Houses	<ul style="list-style-type: none"> • With this option, there would be no clear means by which developers could establish that the premises were not viable as a pub business; • This option would not be a true reflection of current market trends and would lead to an increase in disused pubs which may never reopen; • This approach may not offer complete protection of public houses as they could simply become a restaurant before changing into an alternative use; • Support for this approach – loss of public houses could lead to isolation of communities.
Option 173 - Safeguarding Public Houses	<ul style="list-style-type: none"> • Support for this approach as it would provide a clear means by which a developer can objectively establish viability; • This option would provide a much needed safeguard against unwelcome closures and unsuitable conversions; • Independent assessment of a pub’s viability is very important; • Concern that the policy could become overly restrictive – needs to be flexible to reflect economic realities and the values and benefits of alternative uses; • Presumption in favour of maintenance is a very good idea.
Option 174 – Extend safeguarding of public houses to former public houses	<ul style="list-style-type: none"> • This approach should be adopted; • To try and bring properties back into pub use when they have been out of this use for a considerable time is a disproportionate policy response.
Option 175 – Allow flexible re-use of public houses	<ul style="list-style-type: none"> • Former public houses identified as such and in use as a community facility should be able to revert back to this use without the need for a planning application.

SECTION OF THE ISSUES AND OPTIONS REPORT (2012)	KEY ISSUES ARISING FROM CONSULTATION
NEW OPTIONS ARISING FOLLOWING COMMUNITY INVOLVEMENT	
No additional options have been suggested.	

Evidence base:

- GVA Grimley (2012). Cambridge Public House Study (2012);
- Interim Planning Policy Guidance on The Protection of Public Houses in the City of Cambridge (2012);
- Appeal decisions:
 - The Unicorn, 15 High Street, Cherry Hinton, APP/Q0505/A/11/2167572;
 - The Carpenters Arms, 182-186 Victoria Road, APP/Q0505/A/12/2168512;
 - The Plough, High Street, Shepreth, Royston, APP/W0530/A/11/2167619;
 - Royal Standard, 292 Mill Road, APP/Q0505/A/12/2174210;
 - Rosemary Branch, 67 Church End, APP/Q0505/A/12/2183797.

How the policy came about:

84. Chapter 1 of the National Planning Policy Framework recommends policies should be flexible enough to accommodate needs not anticipated in the plan and to allow a rapid response to changes in economic circumstances. The same document's Chapter 2 (Ensuring the vitality of town centres) of the National Planning Policy Framework recommends policies that support the viability and vitality of town centres. Chapter 8 (Promoting healthy communities) of the National Planning Policy Framework recommends policies that increase the opportunity for community interaction with community members who might otherwise never meet. Paragraph 70 of the National Planning Policy Framework states that planning policies should plan positively for the provision and use of shared spaces and community facilities.
85. Five options regarding public houses were consulted upon as part of the Issues and Options (2012) consultation, namely:
- Option 171 - Public Houses: Market led approach;
 - Option 172 - Protection for all Public Houses;
 - Option 173 - Safeguarding Public Houses;
 - Option 174 – Extend safeguarding of public houses to former public houses; and
 - Option 175 – Allow flexible re-use of public houses
86. Concerns about Option 171 (market led approach) were raised over its effectiveness, as it would not require developers to establish a public house's viability as a pub business. Although it is also argued that a viable business would not close and the protection of some public houses would be futile.

Strong public opposition to this option remains with concern for the protection of community facilities. Concern remains over the effectiveness of the market forces option to establish that the premises were not viable as a pub business.

87. The interim Sustainability Appraisal considers this option (171) could have a significant adverse effect on community spirit and the vibrancy and vitality of local neighbourhoods as well as having the potential to harm Cambridge's character, and subsequent appeal to tourists. However, the conversion of unviable public houses into alternative uses could help improve the character and appearance of local neighbourhoods. In general, the Sustainability Appraisal identified a number of uncertain effects against the majority of sustainability topics. The protection of public houses from higher value uses would protect these facilities. However, this option could result in redundant public houses remaining unused. Buildings, which are dilapidated or boarded up, can have a negative effect upon the appearance of an area.
88. While there was support for Option 172 to avoid communities becoming isolated this option would not be able to force closed public houses to remain open. This option would not be a true reflection of current market trends and would lead to an increase in disused pubs that may never reopen. Option 172 would need to protect the site rather than the use otherwise public houses could simply become a restaurant before changing into an alternative use. Finally, as with option 171, doubts about this option have been raised over its effectiveness, as it would not provide a clear means by which developers could establish that the premises were not viable as a pub business. The Interim Sustainability Appraisal supported this option as it balanced the need for some protection from higher value uses with the need for flexibility where the existing use as a public house is found to be unviable. The pre-application consultation requirement with local residents should help ensure any new use is in keeping with the needs and character of the local area.
89. Option 173 would provide developers with a clear and objective way in which to establish viability, using an independent valuation for the marketing of the site. For local communities, this option would provide safeguards against the unnecessary closure of viable public houses and help to identify the value associated with a public house. This will allow planning decisions to consider the value of the existing public house use and that of any alternative proposal that will result in the permanent loss of the public house. Evidence of diversification will demonstrate that the business has attempted to adapt to changing circumstances.
90. Option 174 risks creating uncertainty for properties and, or businesses which may have once occupied an historical public house site. The proposed list of safeguarded public houses sites are those that were public houses in July 2006, the date when the current Local Plan was adopted. This ensures consistency between the Cambridge Local Plan 2006, the National Planning Policy Framework and the emerging new Local Plan.

91. The difficulty of applying safeguarding measures to former public houses not on the list of safeguarded public house sites is exemplified in the following situation where a restaurant is gradually established in a former public house building. If a public house already served food it may already have had a kitchen with extractor fans etc. in order to provide food. Overtime, it would be permissible for the pub to turn into a restaurant without formerly requiring planning permission. It is therefore difficult to determine when a public house changed into a restaurant unless some form of audit took place or specific planning permission was granted indicating a different use was now in operation. Anecdotal evidence may suggest when a pub became a restaurant however this could not be relied upon as a means of determining its date of conversion. This means it is difficult to establish when a public house stopped being a public house and changed use legitimately into a different use without planning permission. It would therefore be reasonable to only apply the proposed safeguarding guidance to those public house sites on the safeguarding list.
92. Option 175 would allow public house sites with some flexibility to diversify beyond public house use while retaining the potential for its original use to return.
93. The approach being pursued in Policy 76 is to develop options 173 and 175, into a policy in the Local Plan which clarifies the rigorous criteria that should be satisfied to determine if the loss of a public house site is acceptable or not. The policy will be applied to a list of safeguarded public house sites (provided with this option) in order to provide much greater clarity regarding the policy's application. The list of safeguarded sites represents premises that were public houses in July 2006, the date when the current Local Plan was adopted. This ensures consistency between the Cambridge Local Plan 2006, the Interim Planning Policy Guidance on the Protection of Public Houses in the city of Cambridge, the National Planning Policy Framework and the new Local Plan. This list includes pubs with unimplemented planning permissions, former public houses that are either in an alternative use (i.e. a restaurant) or are simply closed and where the public house use could potentially return. The list of safeguarded public house sites provides a suitable benchmark that will be updated periodically to ensure it remains accurate. Public house sites that are redeveloped for uses that prevent the return of the public house use will be removed from the list. Similarly, new public houses will be added to the list. Any applications involving the loss/conversion/development of these public house sites will be determined in accordance with the new policy.
94. With regard to public house amenity spaces such as car parks and gardens, large outdoor spaces attached to pubs will be subject to similar pressures for residential development as for large private dwelling house gardens or other open spaces. The relevant policy safeguarding public houses will also include

reference to the circumstances where the loss of any amenity space including car parking would be acceptable.

95. The interim Sustainability Appraisal raised concerns about the option proposing no protection for public houses in Cambridge. This could have a significant adverse effect on community spirit and the vibrancy and vitality of local neighbourhoods. Similarly, this option could result in a loss in Cambridge's character, and subsequent appeal to tourists. However, where pubs are demonstrably no longer viable or cannot successfully continue to trade as a public house then conversion into alternative uses may provide opportunities for local scale redevelopment and contribute to improved public realm. The option proposing the protection of all public houses could also have an uncertain effect against the majority of the sustainability topics. In affording some protection from higher value uses, the positive role of public houses in communities would be maintained. However, it could result in redundant public houses remaining unused. Buildings, which are dilapidated or boarded up, can have a negative effect upon the appearance of an area.
96. Option 173 ensures some protection from higher value uses but offers flexibility where the existing use as a public house is found to be unviable. This is likely to help address issues relating to community and wellbeing through the continued provision of community space, and should help contribute to creating vibrant and inclusive communities. The proposal to undertake pre-application consultation with local residents should help ensure any new use is in keeping with the needs and character of the local area.
97. By extending option 173 to include former public houses, option 174 is likely to help protect the vibrancy and vitality of local areas by maintaining community space provision. The protection of such facilities from higher value uses may bring about a beneficial economic effect, for instance through safeguarding tourism. By using the criteria of option 173 to assess the need for protection against community requirements, this option should ensure that protective measures are balanced against the need to tackle deprivation through conversion / redevelopment in certain areas of the city.
98. Option 175 is likely to provide the necessary flexibility for the public housing market to expand as well as contract, resulting in similar effects to option 174 on community well being and the economy. However, the effect of this option across the city is uncertain, as it may distort the market by creating too many A-uses and restricting the creation of residential units, which has an uncertain effect on issues such as tackling deprivation.

Findings of the Sustainability Appraisal of the Cambridge Local Plan (July 2013)

99. No adverse impacts from this policy on the sustainability objectives were predicted as part of the Sustainability Appraisal process.

Key Issues raised during Proposed Submission consultation

Policy 76: Protection of public houses	
Total Representations: 6	
Object: 3	Support: 3
Objections	<ul style="list-style-type: none"> • Policy should be simplified and made less prescriptive; • Policy is unlawful because it has no legal basis and is an obstacle to development; • The council should not specify how many public houses per head should exist based upon the local population; • Much stronger protection of public houses gardens especially in areas deficient in open space.
Support	<ul style="list-style-type: none"> • Support for protecting public houses and their alternative community use.

Minor Modifications suggested following Proposed Submission consultation and implications for Sustainability Appraisal

100. No changes to Policy 76: Protection of public houses or the supporting text are suggested in the Addendum to the Cambridge Local Plan 2014: Proposed Submission document. There are therefore no impacts on the findings of the Sustainability Appraisal.

Policy 77: Development and Expansion of Hotels

EXISTING POLICY TO BE REPLACED (CAMBRIDGE LOCAL PLAN 2006)	OPTION(S) BEING TAKEN FORWARD FROM THE ISSUES AND OPTIONS REPORT (2012) AND ISSUES AND OPTIONS 2 (2013)	OPTION(S) NOT BEING TAKEN FORWARD FROM THE ISSUES AND OPTIONS REPORT (2012)
Policy 6/3 Tourist Accommodation	<ul style="list-style-type: none"> • Option 154 Additional hotel provision based on a medium growth scenario of around 1,500 new bedrooms • Option 155 Location of new hotels 	<ul style="list-style-type: none"> • Option 153 Additional hotel provision based on a high growth scenario of around 2,000 new bedrooms

Key issues raised during Issues and Options (2012) and Issues and Options 2 (2013) consultations:

SECTION OF THE ISSUES AND OPTIONS REPORT (2012)	KEY ISSUES ARISING FROM CONSULTATION
Option 153: Additional hotel provision based on a high growth scenario of around 2,000 new bedrooms	<ul style="list-style-type: none"> • Support provision of higher growth in hotel rooms but it shouldn't be used as a cap; • Strongly support option, as there is a huge demand for more rooms for business and the University. The deficit is far greater than that for residential; • Support the policy for at least 2,000 additional bedrooms but add some flexibility for the location within Addenbrooke's; • Support the policy provided it is managed and monitored. Need more staying visitors not day-trippers; • Support option and it might allow less successful hotel sites to be released for residential or care homes if the high forecast is not achieved; • Our door should be open but we should not be actively seeking hotels; • Go for lower number of bedrooms as it would encourage less traffic; • Petersfield has been targeted for budget hotels which will cause gridlock on Newmarket Road; • The City Centre cannot accommodate much more growth and this will add to parking issues. Develop new hotels on the edge of the city where guests can use Park and Ride.
Option 154: Additional hotel provision based on a medium growth scenario of around 1,500 new bedrooms	<ul style="list-style-type: none"> • A policy is not required for this matter as market forces should decide.
Option 155: Location of new hotels	<ul style="list-style-type: none"> • Small boutique hotel at Mill Lane; • Suitability of one at the airport is supported; • NPPF at paragraph 23 calls for vitality in town centres. Cambridge suffers from overcrowding rather than lack of vitality. NPPF advises look to edge of city when City Centre sites unavailable; • Mill Lane isn't a viable location for a 5 star hotel.
NEW OPTIONS ARISING FOLLOWING COMMUNITY INVOLVEMENT	
No additional options have been suggested.	

Evidence base:

- Hotel Solutions (2012). Cambridge Hotel Futures Study;
- CLG (2006). Good Practice Guide On Planning For Tourism;
- East of England Tourism (2007). Volume and Value Study for Cambridge City
- Tourism South East (2010). Economic Impact Of Tourism Cambridge City Results;
- SQW (2011). Cambridge Cluster Study 2011;
- SQW (2009). Cambridgeshire Development Study;
- Greater Cambridge and Peterborough Tourism Strategy and Action Plan (2007)

How the policy came about:

101. Aside from leisure tourists who generate around 35% of the demand for visitor accommodation, the two Universities and businesses also generate significant demands, about 65% of the demand for good quality visitor accommodation.
102. The city has 33 hotels, which provide 2,115 bedrooms. 13 hotels are located in the City Centre providing 949 rooms, eight hotels are located outside the City Centre providing 293 rooms and 11 hotels are located on the city's outskirts providing a further 873 bedrooms.
103. Planning permission has already been granted for around 1,350 new bedrooms in eight schemes in and around the city, with proposals for a further 50 rooms yet to be determined. It is not certain that all of these commitments will be actually delivered as the viability of hotel building is finely balanced, particularly where residential land values are so high.
104. The Cambridge Hotel Futures Study identifies market potential for a further 2-3 new boutique hotels in Cambridge city centre approximately 150-300 rooms over the next 20 years together with possible scope for a new luxury 4 or 5 star hotel.
105. If the hotels proposed in North West Cambridge and at Addenbrooke's come forward, no more 3 or 4 star hotels are needed in the outer city area to 2031. The research undertaken by Hotel Solutions suggests budget hotels look to be adequately catered for with existing commitments. A small growth in serviced apartments looks likely.
106. A new generation of serviced accommodation that combines an element of self-catering with some hotel-style service is causing a blurring of the boundaries between uses in planning terms.
107. These types of premises are generally intended to service extended stay corporate and university markets. They may, however, let units for shorter stays to business and leisure markets.

108. They tend fall into four main categories:

- All suite hotels (C1 hotel use);
- Aparthotels/apartment hotels (C1 hotel use);
- Purpose built serviced apartment blocks (C1 hotel use); and
- Residential apartments let as serviced apartments by letting agencies (C3 use).

109. Suite hotels, apartment hotels and serviced apartments can be let on a daily short-term basis, but may be subject to a three night minimum stay. They usually have a reception and hotel-style booking facilities.

110. In some cases serviced apartments can result in the loss of properties built as residential homes or affordable housing being converted to serviced apartments outside the scope of the planning system. Such loss of residential and affordable housing whilst providing visitor accommodation could potentially have adverse impact upon the local housing market. This is undesirable in Cambridge given it is an area of significant housing pressure. Therefore this policy needs to be read in conjunction with policy 45 on affordable housing.

Findings of the Sustainability Appraisal of the Cambridge Local Plan (July 2013)

111. The findings of the Sustainability Appraisal of the draft Cambridge Local Plan undertaken in July 2013, were that overall the plan would lead to significant positive effects in terms of the following SA objectives:

- promote social cohesion and sustainability and a high quality of life by maintaining and enhancing provision for open space, sports and recreation, community and leisure facilities, including arts and cultural venues that serve Cambridge and the sub-region
- ensure appropriate and timely provision of environmentally sustainable forms of infrastructure to support the demands of the city, including digital and cultural infrastructure
- promote a safe and healthy environment, minimising the impacts of development and ensuring quality of life and place.

112. The appraisal noted that given the importance of tourism to the Cambridge economy, and the impacts that such activity could potentially have on the centre, Policy 77, 78 and 79 are likely to collectively result in significant positive effects.

Key Issues raised during Proposed Submission consultation

Policy 77: Development and expansion of hotels	
Total Representations: 131	
Object: 128	Support: 3
Objections	<ul style="list-style-type: none"> • Location of Hotels: <ul style="list-style-type: none"> ○ They should be sited in industrial areas; ○ Close to the airport; ○ Near Park and Ride facilities; ○ Not in Eastern Gate or Petersfield. • Policy should support for budget hotels and hostels that facilitate access for disabled people. These should satisfy the British Standard 8300 or English Tourist Board requirements for disabled access; • A reference to hotels submitted as sui generis developments and contribution towards affordable housing is required; • A dedicated policy dealing with aparthotels and serviced apartments is needed to properly assess them in Use Class terms; • Policy 41 conflicts with the intentions of Policy 77 through the blanket protection of all employment space within with the city; • The expansions of existing hotels should be integrated with the transport infrastructure, so where the hotel is poorly sited further expansion should be resisted as there appears to be sufficient interest in providing capacity elsewhere; • There should be more than adequate hotel parking provided unless close to a public car park.
Support	<ul style="list-style-type: none"> • Support location of new hotel development at Old Press/Mill Lane.

Minor Modifications suggested following Proposed Submission consultation and implications for Sustainability Appraisal

113. As a result of assessment, one minor modification is suggested for Policy 77: Development and expansion of hotels. This change is in the Addendum to the Cambridge Local Plan 2014: Proposed Submission document marked as PM/8/003 and reads as:

“Proposals for small, high quality hotels will also be supported in other City Centre locations, while larger high quality hotels beyond the City Centre may come forward in North West Cambridge and at Cambridge Biomedical Campus and Addenbrooke’s hospital (including Addenbrooke’s Hospital).”

This change is suggested in order to be consistent with other references to Addenbrooke’s Hospital throughout the plan.

114. Following consideration of the impact of this change on the Sustainability Appraisal Framework, it has been concluded that this change does not materially alter the findings of the Sustainability Appraisal.

Policy 78: Redevelopment or loss of hotels

EXISTING POLICY TO BE REPLACED (CAMBRIDGE LOCAL PLAN 2006)	OPTION(S) BEING TAKEN FORWARD FROM THE ISSUES AND OPTIONS REPORT (2012) AND ISSUES AND OPTIONS 2 (2013)	OPTION(S) NOT BEING TAKEN FORWARD FROM THE ISSUES AND OPTIONS REPORT (2012)
Policy 6/3 Tourist Accommodation	<ul style="list-style-type: none"> • Option 156 Support the development of existing City Centre hotels and conversion of suitable City Centre properties to hotels • Option 160 Retention of hotels in the City Centre 	Option 161 Do not include a policy to retain hotels in the City Centre

Key issues raised during Issues and Options (2012) and Issues and Options 2 (2013) consultations:

SECTION OF THE ISSUES AND OPTIONS REPORT (2012)	KEY ISSUES ARISING FROM CONSULTATION
Option 156: Support the development of existing City Centre hotels and conversion of suitable City Centre properties to hotels	<ul style="list-style-type: none"> • Oppose the view that large houses with 5+ bedrooms are unsuited to family accommodation; • City centre redevelopment will hit conservation issues; • Possible sites include Bingo Hall on Hobson Street, Llandaff Chambers over Mandela House, Sainsbury's in Sidney Street if they moved, GA building on Hills Road /Station Road corner, 32-38 Station Road.
Option 160: Retention of hotels in the City Centre	<ul style="list-style-type: none"> • Support if there is flexibility to exit the market; • Support retention of hotels in the centre, which needs to be defined.
Option 161: Do not include a policy to retain hotels in the City Centre	<ul style="list-style-type: none"> • Likely to get a better hotel offer by freeing up the market rather than adding constraints to it.
NEW OPTIONS ARISING FOLLOWING COMMUNITY INVOLVEMENT	
No additional options have been suggested.	

Evidence base:

- Hotel Solutions (2012). Cambridge Hotel Futures Study;
- CLG (2006). Good Practice Guide On Planning For Tourism

How the policy came about:

115. The National Planning Policy Framework's paragraph 23 encourages local authorities to support the vitality of town centre uses by ensuring a range of suitable sites meet the scale and type of demand for leisure and tourism uses. Supporting the sustainable growth of tourism is compatible with these national policy aims and the local aim of building a strong and competitive economy.
116. Given the strong demand for city centre sites for hotels the council aims to safeguard existing hotels and guest houses subject to appropriate viability and marketing tests. Poorer quality and less well located hotels and guest houses may to exit the market where they have no viable future as a hotel or guest house.
117. Higher value uses such as residential use will always put pressure on the retention of such premises.
118. A hotel retention policy is not intended to present existing hotels with a stranglehold on their future development. Such policies are common in resorts, which often define a hotel zone where loss would be resisted. However, where the case can be made that the hotel is not and cannot be made viable with investment, exit can sometimes be negotiated.
119. The council will seek evidence to support any applications for change of use to test the nature of any marketing and viability calculations.
120. With the level of new budget supply coming on stream in the short term, ahead of market forecasts, and as the fair share analysis has shown, the council expects that there may be some guest houses and small hotels that might seek to exit the market. Outside the core city centre/fringe zone, there might be more flexibility to permit this, and those properties that are less well-located and of poorer quality might be lost without too much detriment to the overall supply.
121. This approach is supported by the sustainability appraisal and it will support the growth of tourism while minimising its impact on the city's transport infrastructure through reducing the need to travel.
122. The findings of the Hotel Solutions Study point to the fact that the Cambridge hotel offer to date has not been of a standard which such a famous historic City deserves. There is also very strong competition for a number of competing uses particularly within the City Centre.

123. The boundary of the City Centre may be reviewed when the current retail study is completed and will be shown on the Policies Map. The National Planning Policy Framework also requires Local Plans to define the extent of town centres.

Findings of the Sustainability Appraisal of the Cambridge Local Plan (July 2013)

124. The findings of the Sustainability Appraisal of the draft Cambridge Local Plan undertaken in July 2013, were that overall the plan would lead to significant positive effects in terms of the following SA objectives:

- promote social cohesion and sustainability and a high quality of life by maintaining and enhancing provision for open space, sports and recreation, community and leisure facilities, including arts and cultural venues that serve Cambridge and the sub-region
- ensure appropriate and timely provision of environmentally sustainable forms of infrastructure to support the demands of the city, including digital and cultural infrastructure
- promote a safe and healthy environment, minimising the impacts of development and ensuring quality of life and place.

125. The appraisal noted that given the importance of tourism to the Cambridge economy, and the impacts that such activity could potentially have on the centre, Policy 77, 78 and 79 are likely to collectively result in significant positive effects.

Key Issues raised during Proposed Submission consultation

Policy 78: Redevelopment or loss of hotels	
Total Representations: 0	
Object: 0	Support: 0
Objections	Not applicable
Support	Not applicable

Minor Modifications suggested following Proposed Submission consultation and implications for Sustainability Appraisal

126. No changes to Policy 78: Redevelopment or loss of hotels or the supporting text are suggested in the Addendum to the Cambridge Local Plan 2014: Proposed Submission document. There are therefore no impacts on the findings of the Sustainability Appraisal.

Policy 79: Visitor attractions

EXISTING POLICY TO BE REPLACED (CAMBRIDGE LOCAL PLAN 2006)	OPTION(S) BEING TAKEN FORWARD FROM THE ISSUES AND OPTIONS REPORT (2012) AND ISSUES AND OPTIONS 2 (2013)	OPTION(S) NOT BEING TAKEN FORWARD FROM THE ISSUES AND OPTIONS REPORT (2012)
6/4 Visitor Attractions	Option 162 Visitor attractions policy	Not applicable.

Key issues raised during Issues and Options (2012) and Issues and Options 2 (2013) consultations:

SECTION OF THE ISSUES AND OPTIONS REPORT (2012)	KEY ISSUES ARISING FROM CONSULTATION
Option 162: Visitor Attractions	<ul style="list-style-type: none"> • Support particularly the development of Kettle's Yard area as secondary tourist destination for people staying in the city; • Cycle parking standards must be applied to attractions; • Not appropriate in city - develop sports and leisure attractions in hotels beyond city e.g. as at Bar Hill.
NEW OPTIONS ARISING FOLLOWING COMMUNITY INVOLVEMENT	
No additional options have been suggested.	

Evidence base:

- Tourism South East (2010). Economic Impact Of Tourism Cambridge City Results.

How the policy came about:

127. The National Planning Policy Framework's paragraph 23 encourages local authorities to support the vitality of town centre uses by ensuring a range of suitable sites meet the scale and type of demand for leisure and tourism uses. Supporting the sustainable growth of tourism is compatible with these national policy aims and the local aim of building a strong and competitive economy.

128. Cambridge is a major international visitor destination. 4.1 million people visited the city in 2010 and of those 3.2 million were day trippers and 835,300 were staying visitors. Overall numbers have declined by only 1% since 2008. Tourism generated £393 million in 2010, which is the equivalent of 10.5% of the Cambridge economy. It employed over 5,150 people in 2010, though 1,500 fewer than in 2008.

129. The city has a great deal to offer discerning visitors including world renowned architecture, the Colleges, museums and other buildings. The River Cam, and interconnected commons and open spaces, provide a unique backdrop to this historic fabric of buildings and spaces. A diverse range of events such as graduation, Science Week, the Folk Festival, literary festivals, specialist shops, pavement cafes and restaurants draw in large numbers of visitors.
130. Key attractions include King's College Chapel, Fitzwilliam Museum, Cambridge University Botanic Gardens, Kettle's Yard, Cambridge and County Folk Museum and the Sedgwick Museum, and further afield the Imperial War Museum Duxford and Anglesey Abbey.
131. The current Local Plan tries to encourage more sustainable tourism in the city with the emphasis on destination management rather than promotion. The diversification of short stay visitor accommodation is supported to encourage longer stays alongside the development of new and alternative attractions.
132. The council recognises that a range of attractions and facilities are important to improve the quality of the visitor experience, but also sees the need to protect the quality of life of people who live here. The main purpose of any tourist development should be to assist in the interpretation of the city, not to attract significantly more visitors to Cambridge.
133. Emphasis has also been placed on encouraging longer stays and fewer day trippers and on the development of an appropriate range of attractions. The availability of a good range of hotels compliments this approach.
134. There has been emphasis in the past on seeking benefits from development in the City Centre to consolidate attractions and make more effective use of open spaces and street space.
135. A criticism of Cambridge's current attractions in recent years has been that it does not offer a great deal to families with younger children. Some diversification of the current attractions would benefit this element of the market.

Findings of the Sustainability Appraisal of the Cambridge Local Plan (July 2013)

136. The findings of the Sustainability Appraisal of the draft Cambridge Local Plan undertaken in July 2013, were that overall the plan would lead to significant positive effects in terms of the following SA objectives:
 - support Cambridge's vibrant and thriving centres, with a varied range of shopping facilities in accessible locations that meet the needs of people living, working and studying in, or visiting, the city and its wider sub-region.

- be located to help minimise the distance people need to travel, and be designed to make it easy for everyone to move around the city and access jobs and services by sustainable modes of transport.
- promote social cohesion and sustainability and a high quality of life by maintaining and enhancing provision for open space, sports and recreation, community and leisure facilities, including arts and cultural venues that serve Cambridge and the sub-region
- ensure appropriate and timely provision of environmentally sustainable forms of infrastructure to support the demands of the city, including digital and cultural infrastructure

137. The appraisal noted that given the importance of tourism to the Cambridge economy, and the impacts that such activity could potentially have on the centre, Policy 77, 78 and 79 are likely to collectively result in significant positive effects.

Key Issues raised during Proposed Submission consultation

Policy 79: Visitor attractions	
Total Representations: 3	
Object: 2	
Support: 1	
Objections	<ul style="list-style-type: none"> • Policy should better manage visitor attractions and facilities; • Encourage long-term visitors and discourage coach parties; • Ensure satisfactory access for disabled people.
Support	<ul style="list-style-type: none"> • No specific proposal for a Community Stadium in Trumpington.

Minor Modifications suggested following Proposed Submission consultation and implications for Sustainability Appraisal

138. No changes to Policy 79: Visitor Attractions or the supporting text are suggested in the Addendum to the Cambridge Local Plan 2014: Proposed Submission document. There are therefore no impacts on the findings of the Sustainability Appraisal.

AUDIT TRAIL: SECTION 9: PROVIDING INFRASTRUCTURE TO SUPPORT DEVELOPMENT

Policy 80: Supporting Sustainable Access to Development

EXISTING POLICY TO BE REPLACED (2006 CAMBRIDGE LOCAL PLAN)	OPTION(S) BEING TAKEN FORWARD FROM THE ISSUES AND OPTIONS REPORT (2012) AND ISSUES AND OPTIONS 2 (2013)	OPTION(S) NOT BEING TAKEN FORWARD FROM THE ISSUES AND OPTIONS REPORT (2012)
<ul style="list-style-type: none"> • 8/4 Walking and Cycling Accessibility • 8/5 Pedestrian and Cycle Network • 8/7 Public Transport Accessibility • 8/8 Land for Public Transport • 8/11 New Roads 	<ul style="list-style-type: none"> • Option 183 Promoting Non-Car Modes of Travel • Option 184 Appropriate infrastructure 	Not applicable

Key issues raised during Issues and Options (2012) and Issues and Options 2 (2013) consultations:

SECTION OF THE ISSUES AND OPTIONS REPORT (2012)	KEY ISSUES ARISING FROM CONSULTATION
Option 183: Promote non-car modes of travel	<ul style="list-style-type: none"> • Significant support for this option and the range of suggested policies within it; • Important to support walking and cycling, and this could be strengthened within the option; • It ignores the need of the motorist; • Public transport needs to be better and more affordable too; • Chisholm Trail vital and stronger reference needed in the plan; • Design in speed reductions in development and other associated highway designs, which dissuade car use; • Support more sustainable car use (car clubs etc.) and alternatives to travel (home working etc.); • Plan should do more to protect and enhance designated rights of way, such as Public Rights of Way, bridleways and National Trails – in line with paragraph 75 of the National Planning Policy Framework.
Option 184:	<ul style="list-style-type: none"> • Good level of support;

Appropriate infrastructure	<ul style="list-style-type: none"> • New developments should contribute to the improvement of existing routes for non-car modes, as well as creating new ones; • Option should be more flexible, so that the deliverability of the development is not impacted by the need to provide infrastructure prior to completion where it is not viable; • Option should be stronger with infrastructure always in place prior to development - remove the “where possible” comment as this allows a get out.
NEW OPTIONS ARISING FOLLOWING COMMUNITY INVOLVEMENT:	
No additional options have been suggested.	

Evidence base:

- Cambridgeshire County Council (2011). Cambridgeshire Local Transport Plan 3;
- Cambridgeshire County Council (2012). Draft Transport Strategy for Cambridge and South Cambridgeshire;
- Building Sustainable Transport into New Developments (DfT 2008)
- Manual for Streets (DfT 2007) [Manual for Streets 1 & 2](#);
- Creating growth, cutting carbon: making sustainable local transport happen (DfT 2011);
- Smarter Choices: Changing the way we travel (DfT 2005)
- The Role of Soft Measures in Influencing Patronage Growth and Modal Split in the Bus Market in England (DfT 2009)

How the policy came about:

1. Policy 80 (Supporting Sustainable Access To Development) represents a combination of a number of policy options that were consulted on at the Issues and Options stage (2012), notably:
 - Option 183: Promoting non-car modes of travel
 - Option 184: Appropriate Infrastructure
2. New development will only function correctly and successfully if the site is accessible for all, and the transport links in and around the site offer the opportunity to access key services such as jobs, education and healthcare facilities and the services offered by local and town centres.
3. Cambridge is a small, compact city, which suffers from congestion on most major radial roads at peak times. Increased growth in the area over the next few years will place additional pressure on these roads. Unless the trend in using sustainable modes of travel for work commutes and leisure trips can be continued and improved. It is therefore important that the Local Plan promotes new development that is highly sustainable, and that promotes easy

access to and from the site by sustainable modes of travel, such as walking, cycling and public transport.

4. As a consequence of this policy, two of the key Local Plan objectives will be delivered. Firstly, this policy will ensure that the environmental impacts of new development will be reduced, safety for all users will be enhanced and the impact on the existing network, particularly with regards to congestion, will be less. This accords with the objective to minimise adverse effects of transport on people and the environment. Secondly, aspects of this policy will help ensure that appropriate infrastructure is provided in the early stages of new developments.
5. The following evidence base and national guidance documents were used in the development of the car parking aspect of this policy:
 - Cambridgeshire County Council (2011). Cambridgeshire Local Transport Plan 3;
 - Cambridgeshire County Council (2012). Draft Transport Strategy for Cambridge and South Cambridgeshire;
 - Building Sustainable Transport into New Developments (DfT 2008)
 - Manual for Streets (DfT 2007) Manual for Streets 1 & 2;
 - Creating growth, cutting carbon: making sustainable local transport happen (DfT 2011);
 - Smarter Choices: Changing the way we travel (DfT 2005)
 - The Role of Soft Measures in Influencing Patronage Growth and Modal Split in the Bus Market in England (DfT 2009)
6. The National Planning Policy Framework is quite unequivocal in paragraph 29 that *“transport policies have an important role to play in facilitating sustainable development, but also contributing to wider sustainability and health objectives”*. The National Planning Policy Framework states a clear requirement in the same paragraph for the transport system to be balanced in favour of sustainable modes of travel, and for a wide choice to be made available in terms of modes of travel. The policy ‘Supporting sustainable access to new development’ is considered to be in conformity with the National Planning Policy Framework in this respect.
7. This policy promotes walking, cycling and public transport access to developments, ensuring that high quality infrastructure for these modes is in place from early occupation whilst also protecting current and future expansions to the pedestrian, cycling and public transport network by safeguarding land for its expansion. Furthermore, the policy ensures any new roads maintain the balance in favour of more sustainable modes of travel, by prioritising their movement in a new development.
8. The policy also supports solutions that reduce Greenhouse Gas Emissions, and will tie in with the County Council’s Transport Strategy for Cambridge and

South Cambridgeshire to develop strategies for the provision of viable infrastructure necessary to support sustainable development. This increases conformity with the National Planning Policy Framework, as it echoes paragraphs 30 and 31.

9. The Interim Sustainability Appraisal (2012) strongly supported the various aspects of this policy, stating that they should bring about positive effects on the uptake of walking, cycling and public transport across the city helping contribute to reducing transport related greenhouse gas emissions (GHG). It also indicated that ensuring there are non-car options for everyone using the development should help improve access, in particular for those with limited mobility, the disabled and the elderly. This policy should also help reduce car dependency and increase the attractiveness of the city for greater cycling and walking. A reduction in traffic impacts, such as noise and emissions, may also contribute to ensuring that new developments do not adversely impact local biodiversity. The Sustainability Appraisal concluded that this policy is likely to have positive benefits across the whole city.
10. The supporting sustainable access to new development policy was consulted on as two individual options, which included a number of facets promoting non-car modes of travel, during the Issues and Options 1 consultation in summer 2012.
11. Each of these options all received very high levels of support, with many respondents stating the importance of ensuring that good existing levels of cycling in particular are built on further, and not taken for granted. This positive response, as well as the National Planning Policy Framework pushing for a balance towards more sustainable modes of travel meant that the formation of this policy would continue the current approach in the Cambridge Local Plan 2006 of placing walking, cycling and public transport ahead of car use as the main means of accessibility to and from new developments.
12. A key aspect highlighted during the consultation is the need to ensure the safety of pedestrians and cyclists features at the top of the list of priorities when designing the transport links in and around new developments, for example, for any new roads. This policy will help deal with such concerns by ensuring that any new roads put the needs of pedestrians and cyclists first. The 'new roads' part of the policy will also create the link to the phased citywide 20mph scheme that the council will be consulting upon during the life of the plan period. This will help integrate new development with the existing city road network.
13. In terms of safeguarding land, numerous calls were made during the consultation to specifically safeguard the Chisholm Trail. This policy will state that any scheme shown in either the County Council's Transport Strategy for Cambridge and South Cambridgeshire (TSCSC), on the Local Plan Policies Map or in the council document 'Protection and Funding of Routes for the Future

Expansion of the City Cycle Network' (which is currently material consideration in the planning process), or its successor documents, will be safeguarded. The Chisholm Trail is a scheme that should be located within the TSCSC, and if so, this policy would provide protection of its route in terms of safeguarded land.

14. Each of the options consulted on during Issues and Options consultation (2012) have been combined to form a policy that supports accessibility to new developments, which balances the modal links in favour of sustainable modes. This conforms to the National Planning Policy Framework.

Findings of the Sustainability Appraisal of the Cambridge Local Plan (July 2013)

15. The findings of the Sustainability Appraisal of the draft Cambridge Local Plan were that overall the plan would lead to significant positive effects in terms of the following SA objectives:
 - assist the creation and maintenance of inclusive, environmentally sustainable communities.
 - promote and support economic growth in environmentally sustainable and accessible locations, facilitating innovation and supporting Cambridge's role as a world leader in higher education, research, and knowledge-based industries, whilst maintaining the quality of life and place that contribute to economic success.
 - be located to help minimise the distance people need to travel, and be designed to make it easy for everyone to move around the city and access jobs and services by sustainable modes of transport.
 - ensure appropriate and timely provision of environmentally sustainable forms of infrastructure to support the demands of the city, including digital and cultural infrastructure.
 - promote a safe and healthy environment, minimising the impacts of development and ensuring quality of life and place.
16. The appraisal noted that Policy 80, requiring high quality public transport provision to be integrated with new development on the edge of Cambridge should lead to positive outcomes by increasing the use of public transport in these areas and minimising residents' use of private cars for travelling into Cambridge. Given the constrained nature of Cambridge's transport network the Plan seeks to make the best use of existing infrastructure by promoting a compact urban form; achieving a modal shift to sustainable transport and reducing the need to travel; all of which should to address historic rises in transport emissions.
17. The appraisal noted that Policies 80, 81, 82 and 85, given the amount of development to be brought forward over the plan-period and the peripheral location of much of this development, these policies appear likely to result in significant positive effects.

Key Issues raised during Proposed Submission consultation

Policy 80: Supporting sustainable access to development	
Total Representations: 25	
Object: 20	Support: 5
Objections	<ul style="list-style-type: none"> • Highways Agency wants a more detailed review on the evidence base with regard to the assessment of the Strategic Road Network and the modelling evidence document. There must be a mechanism to vary the infrastructure schemes associated with the plan if the review shows that this is required. It is recommended that progress on these issues is made prior to a forthcoming examination in public; • Re: criterion b.3 - Restriction of through access should be based on a proper analysis of traffic flows, both in normal conditions and where accidents may occur on major roads to limit the possibility of gridlock; • Policy wording needs strengthening in relation to access to transport for disabled people; • The wording of the Chisholm Trail should be tightened, including specific guarantees that a cycle route between Hooper Street and Mill Road be provided; • Need to undertake a thorough assessment of the impact of the Chisholm Trail and other transport routes on areas such as Stourbridge Common and conservation areas; • Provision for cycling needs to take account of high levels of cycling within Cambridge and go beyond national standards; • More measures should be included to reduce car ownership, promote schemes such as car clubs and promote public transport and cycling. Need to give more consideration to alternative, more radical public transport network improvements and issues such as congestion charging; • The policy is not sufficiently positively prepared or effective in protecting, enhancing and maintaining the environment in the delivery of new road infrastructure, the Transport Strategy for Cambridgeshire must be adequately implemented; • Levels of 40-45% cycle trips should be a policy aim; • Should include the Local Plan 2006 policy wording on lorries and servicing of new developments; • Park and Ride provision needs to be extended and promoted; • Should make reference to need for additional bus and coach interchange (using S106) in the City Centre and Grafton areas and identify land at Grafton including a taxi terminus. Should make reference to relocating long distance coaches and capacity issues at Drummer and Emmanuel Street and the bus stands. Should also reference need for suitably located bus and coach terminus for bus routes accessing the city from

	<p>Newmarket Road and Victoria Avenue;</p> <ul style="list-style-type: none"> • The build out rate of some developments may be longer than five years therefore it may be more appropriate to provide bus services until the service is commercially viable or 5 years following development completion.
Support	<ul style="list-style-type: none"> • Support emphasis on cycling, walking and public transport in new development and in meeting Cambridge’s transport needs; • Agree that sustainable transport alternatives are essential in fringe locations; • Good, easy access to a high quality and efficient transport network is essential to supporting new development and to ensuring it is sustainable; • Welcome the references to the Chisholm Trail; • This policy is welcomed as ensuring new development have access to public transport at an early stage in the delivery of a development plays an important part in establishing travel patterns; • Support the need for a high-quality pedestrian and cycle network to be in place early in the release of a new development.

Minor Modifications suggested following Proposed Submission consultation and implications for Sustainability Appraisal

18. A change was suggested to paragraph 9.8 of the supporting text for Policy 80 in response to a representation (Representation Number 27591) and in order to mitigate the impact of new development. This change is in the Addendum to the Cambridge Local Plan 2014: Proposed Submission document marked as PM/9/001 and reads:

“Developers will be required to ensure the provision of such services from first occupation of the development for a period of up to five years, where this is a viable option for the development in terms of practicality, convenience and cost. In some instances, the build out rate of development may be longer than five years with a consequential need to provide bus services for a longer period of time.”

19. Following consideration of the impact of this change on the Sustainability Appraisal Framework, it has been concluded that this change does not materially alter the findings of the Sustainability Appraisal.

Policy 81: Mitigating the Transport Impact of Development

EXISTING POLICY TO BE REPLACED (2006 CAMBRIDGE LOCAL PLAN)	OPTION(S) BEING TAKEN FORWARD FROM THE ISSUES AND OPTIONS REPORT (2012) AND ISSUES AND OPTIONS 2 (2013)	OPTION(S) NOT BEING TAKEN FORWARD FROM THE ISSUES AND OPTIONS REPORT (2012)
<ul style="list-style-type: none"> 8/2 Transport Impact 8/3 Mitigating Measures 	<ul style="list-style-type: none"> Option 182 Timely Provision of Infrastructure (Part) Option 193 Development only where the impact on the network is able to be mitigated against Option 196 Set a Travel Plan threshold 	<p>Option 197 Do not set a Travel Plan threshold</p>

Key issues raised during Issues and Options (2012) and Issues and Options 2 (2013) consultations:

SECTION OF THE ISSUES AND OPTIONS REPORT (2012)	KEY ISSUES ARISING FROM CONSULTATION
Option 182: Timely provision of infrastructure	<ul style="list-style-type: none"> Lots of support for the principle of the policy – getting infrastructure into development early is key; Feeling that the policy hasn't always been successful / implemented strongly enough in the past and caused congestion issues.
Option 193: Development only where the impact on the network is able to be mitigated against	<ul style="list-style-type: none"> Strong support. Word the policy more like paragraph 32 of the NPPF – specifically, permit development “where the residual cumulative impacts of development is not severe”. Any policy should state that development would not only aim to mitigate, but also improve the situation. Distinction needs to be made between ‘car congestion’ and congestion or increased trips for other, non-car modes – these are not as harmful to the area (e.g. increasing cycle trips shouldn't prevent development due to their specific infrastructure causing more car delays). Policy should be firmer and only allow development where there is no worsening of congestion.
Option 196: Set a	<ul style="list-style-type: none"> Good support for setting a threshold.

travel plan threshold	<ul style="list-style-type: none"> • Some agreement that the threshold should be approximately 10 units – this is similar to the ‘all major developments’ put forward at Issues and Options. • Could be too inflexible. • No need for individual policy, just incorporate into Option 193 (development only where the impact on the network can be mitigated against). • Threshold alone not enough.
Option 197: Do not set a travel plan threshold	<ul style="list-style-type: none"> • Good support for this option also. • This is flexible and takes into account individual site circumstances. • No need for individual policy, just incorporate into Option 193 (development only where the impact on the network can be mitigated against). • All sites should have the presumption of a travel plan, and be required to justify why they don’t need one (not the other way around). • This option would leave too much uncertainty for developers. • Less travel plans would result from this option, as opposed to 196.
NEW OPTIONS ARISING FOLLOWING COMMUNITY INVOLVEMENT:	
No additional options have been suggested.	

Evidence base:

- Cambridgeshire Local Transport Plan 3 (Cambridgeshire County Council, 2011);
- Draft Transport Strategy for Cambridge and South Cambridgeshire (Cambridgeshire County Council, 2012);
- DfT (2010). The Effects of Smarter Choice Programmes in the Sustainable Travel Towns; and
- DfT (2011). Creating growth, cutting carbon: making sustainable local transport happen.

How the policy came about:

20. Policy 81 represents a combination of a number of policy options that were consulted on at the Issues and Options stage, notably:
- Option 182: Timely provision of infrastructure;
 - Option 193: Development only where the impact on the network is able to be mitigated against;
 - Option 196: Set a travel plan threshold; and
 - Option 197: Do not set a travel plan threshold.

21. It is important that the impact of a new development on the already congested transport network in Cambridge is significantly worsened. This policy will ensure that applicants provide sufficient information so that the impacts on the transport network can be demonstrated as part of any application. In addition, this policy will ensure measures to mitigate any transport impact are forthcoming. It will require travel plans for all developments classed as 'major', and seek developer contributions towards paying for the transport infrastructure needed to mitigate any impacts. This will be vital in ensuring new development in Cambridge is sustainable.
22. As a consequence of this policy, two of the key objectives will be delivered. Firstly, this policy will ensure that the environmental impacts of new development will be less, safety for all users will be enhanced and the impact on the existing network, particularly with regards to congestion, will be less. This accords with the objective to minimise adverse effects of transport on people and the environment. Secondly, aspects of this policy will help ensure that appropriate infrastructure is provided in the early stages of new developments.
23. The following evidence base and national guidance documents were used in the development of the Mitigating the Transport Impact of Development policy:
 - Cambridgeshire Local Transport Plan 3 (Cambridgeshire County Council, 2011);
 - Draft Transport Strategy for Cambridge and South Cambridgeshire (Cambridgeshire County Council, 2012);
 - DfT (2010). The Effects of Smarter Choice Programmes in the Sustainable Travel Towns; and
 - DfT (2011). Creating growth, cutting carbon: making sustainable local transport happen.
24. Paragraph 32 of the National Planning Policy Framework states that a Transport Statement or a Transport Assessment should accompany all developments that generate significant amounts of movement. This policy will ensure that this is a requirement for new development in Cambridge. Furthermore, this policy will ensure that the plan conforms to the National Planning Policy Framework's requirement to undertake improvements to the transport network and mitigating any negative impacts, in order to help make a new development acceptable.
25. The National Planning Policy Framework also calls for travel plans to be a key tool in facilitating the use of sustainable modes of travel. This policy requires that any developments over the 'major developments' threshold (this is 10 dwellings for residential or 1,000 square metres of floorspace for non-residential) submit a travel plan with their application, thus ensuring that travel plans play a key role in Cambridge's new development promoting sustainable travel. Evidence from the Department for Transport's 2010 study

on Sustainable Travel Towns outlines how key travel plans are in bringing about positive changes in travel behaviour towards walking, cycling and public transport.

26. The Interim Sustainability Appraisal (2012) states that this option will help contribute to increasing the modal share of cycling, walking and public transport. However, it also recognises that any new development is likely to place some additional pressure on the transport network. The Sustainability Appraisal also recognises that the further promotion of travel plans is likely to have a positive impact on the uptake of sustainable modes of travel.
27. The aspects that make up the Mitigating the Transport Impact of Development policy were consulted on during Issues and Options in summer 2012. Option 193 “development only where the impact on the network can be mitigated” covered the requirement to provide adequate information on the likely transport impacts of development along with any planning application. This received high levels of support, and ensures that early interaction between the County Council, as highways authority, Cambridge City Council and the applicant takes place.
28. In terms of the mitigation component of the option, this also received significant levels of support. There were also numerous calls for impacts on the network to be improved, and not just negated, in order for development to be supported. It is considered that the increased emphasis on travel plans, as well as continued promotion of non-car modes of travel will help to bring about further positive results in terms of modal share, as seen in the 2011 census.
29. Option 182 “timely provision of infrastructure” also inputted into the resultant policy, with Issues and Options Report (2012) considering the delivery of infrastructure to aid development, as well as influencing planning conditions and planning obligations. The emergence of the Community Infrastructure Levy (CIL) will also impact on this policy, with contributions likely to be sought towards transport infrastructure improvements during the plan period.
30. The final facet of this policy is the requirement to provide a travel plan for all developments classed as ‘major’. This was consulted on during the Issues and Options (2012) report also (options 196 and 197) and having a threshold to require a travel plan proved to be more popular than not having a threshold. It is considered that this provides more certainty for applicants submitting a planning application than simply requiring one where a Transport Assessment states there is a need, as is the current scenario. Indeed, the National Planning Policy Framework has placed much greater significance in the use of travel plans, and it seems sensible therefore to require these on a more certain basis.

Findings of the Sustainability Appraisal of the Cambridge Local Plan (July 2013)

31. The findings of the Sustainability Appraisal of the draft Cambridge Local Plan were that overall the plan would lead to significant positive effects in terms of the following SA objectives:
 - assist the creation and maintenance of inclusive, environmentally sustainable communities.
 - promote and support economic growth in environmentally sustainable and accessible locations, facilitating innovation and supporting Cambridge's role as a world leader in higher education, research, and knowledge-based industries, whilst maintaining the quality of life and place that contribute to economic success.
 - be located to help minimise the distance people need to travel, and be designed to make it easy for everyone to move around the city and access jobs and services by sustainable modes of transport.
 - ensure appropriate and timely provision of environmentally sustainable forms of infrastructure to support the demands of the city, including digital and cultural infrastructure.
 - promote a safe and healthy environment, minimising the impacts of development and ensuring quality of life and place.
32. The appraisal noted that Policy 81 should ensure that the impacts of transport on determinants of wellbeing (such as air quality) are addressed, encouraging a shift to sustainable transport modes of transport that should generate associated benefits (such as increased walking and cycling promoted by Policy 80).
33. The appraisal recommended that Policy 80 be strengthened and reworded to make it clearer what type of infrastructure the financial contributions would be used or (i.e. to clarify whether this would include sustainable transport infrastructure to create a virtuous circle). This policy could better support the transport objectives if these contributions were to be directed towards sustainable transport infrastructure. These recommendations would be included in the revised Planning Obligations SPD which should provide much greater clarity on the types of sustainable infrastructure to be provided by financial contributions.
34. The appraisal noted that Policies 80, 81, 82 and 85, given the amount of development to be brought forward over the plan-period and the peripheral location of much of this development, these policies appear likely to result in significant positive effects.

Key Issues raised during Proposed Submission consultation

Policy 81: Mitigating the transport impact of development	
Total Representations: 11	
Object: 10	Support: 1
Objections	<ul style="list-style-type: none"> • The definition “reasonable and proportionate financial contributions/mitigation measures” and grounds for an “unacceptable transport impact” are not clearly defined; • Should make reference to the scope for documents needing to be agreed with Cambridgeshire County Council as the local highway authority in addition to the city council; • Highways Agency – need more detailed review of evidence base in relation to the assessment of the strategic road network including access to the models to determine if the schemes in the Transport Strategy and Infrastructure Delivery Study are appropriate or if alternative or additional schemes are needed. Needs to be progressed before the examination in public. • Transport assessments text - Unclear what commitment the city and the county are really making" to ensuring effective interventions are secured in order to achieve suitable mitigation of the additional transport impacts of the development"; • The provision of a travel plan should not be seen as a substitute to the provision of actual infrastructure (it should complement it); • All residential development of above 60 dwellings must provide a travel plan; • Should have regard to the effects of potential mitigation measures, so that it is clear that the assessment is to be made of residual impacts, and in turn that the test should be that of avoiding severe impacts (as set out in NPPF); • Re: Community Infrastructure Levy. The concept is understood, however the level of the charge and lack of definition of the rates to be applied and the timing makes it hard to assess. The levy is likely to have the impact of creating a greater difference between costs of living in Cambridge and the surrounding areas. A consistent levy on development in the city and South Cambridgeshire is supported to avoid development pressures being displaced adjacent areas surrounding the city; • Transport links must be in place before building any housing developments; • Local plan needs to work well with related strategies and plans, residential access and business needs must also be considered and integrated.
Support	<ul style="list-style-type: none"> • Travel plans promoting use of sustainable transport modes will limit the negative impacts of additional transport needs and improve resilience to increasing oil prices. It is imperative that plans are operational from first occupancy of new

	developments to establish sustainable travel habits.
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Minor Modifications suggested following Proposed Submission consultation and implications for Sustainability Appraisal

35. A change was suggested to paragraph 9.18 of the supporting text to Policy 81 in response to a representation (Representation Number 27597) and in order to mitigate the impact of new development. This change is in the Addendum to the Cambridge Local Plan 2014: Proposed Submission document marked as PM/9/002 and reads:

“New development often brings with it the need for new transport and more pressure on the transport network is a common consequence of this. Any additional strain on the transport network as a result of new development needs to be appropriately assessed by the council and Cambridgeshire County Council as the highways authority and mitigated.”

36. A change was also suggested after paragraph 9.22 of the supporting text to Policy 81 in response to a representation (Representation Number 27270). This change is in the Addendum to the Cambridge Local Plan 2014: Proposed Submission document marked as PM/9/003 and involves the inclusion of an additional paragraph which reads:

"Any development that will require regular loading or servicing must avoid causing illegal or dangerous parking, by providing appropriate off-street facilities."

37. Following consideration of the impact of these changes on the Sustainability Appraisal Framework, it has been concluded that these changes do not materially alter the findings of the Sustainability Appraisal.

Policy 82: Parking Management

EXISTING POLICY TO BE REPLACED (2006 CAMBRIDGE LOCAL PLAN)	OPTION(S) BEING TAKEN FORWARD FROM THE ISSUES AND OPTIONS REPORT (2012) AND ISSUES AND OPTIONS 2 (2013)	OPTION(S) NOT BEING TAKEN FORWARD FROM THE ISSUES AND OPTIONS REPORT (2012)
<ul style="list-style-type: none"> • 8/6 Cycle Parking • 8/9 Commercial Vehicles and servicing • Policy 8/10 Off Street Car Parking 	<ul style="list-style-type: none"> • Option 185 Low emission vehicle infrastructure • Option 186 Maintain the current level of provision • Option 187 New residential parking 	Not applicable

	standards <ul style="list-style-type: none"> • Option 188 completely new standards for all development • Option 189 Car free development • Option 190 Incorporate car free development into existing policy • Option 191 Location, Design and Quality • Option 192 Update the cycle parking standards of the 2006 local plan 	
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Key issues raised during Issues and Options (2012) and Issues and Options 2 (2013) consultations:

SECTION OF THE ISSUES AND OPTIONS REPORT (2012)	KEY ISSUES ARISING FROM CONSULTATION
Option 185: Low emission vehicle infrastructure	<ul style="list-style-type: none"> • Mix of views on this, some say that a specific policy on this is not appropriate, others supporting the principle of it. • The market will decide when this is appropriate. • Support for car club and car sharing. • Could adversely affect viability if this option is made a requirement for smaller developments. • May not be sufficient demand to have this type of infrastructure in place from the outset. • Should only apply to major developments and should only require that the development has the 'capability' to install this type of infrastructure, rather than providing it from the outset. • Incorporate parts of option 185 into other policies, such as option 184.
Option 186: Maintain the current level of provision	<ul style="list-style-type: none"> • Some support for the current level of provision; • Existing policy can be improved; • Provide for car ownership but not usage.
Option 187: New residential car parking standards	<ul style="list-style-type: none"> • Car parking spaces are needed, even if the cars are only used occasionally; • Provide for car ownership but not usage. Car ownership

	<ul style="list-style-type: none"> cannot be controlled; Higher levels of car parking could conflict other policies aimed at sustainable travel.
Option 188: Completely new standards for all development	<ul style="list-style-type: none"> Some support for this option; Local circumstances need to be taken into account; Higher levels of car parking could conflict other policies aimed at sustainable travel.
Option 189: Car free development	<ul style="list-style-type: none"> Limited support for a 'stand-alone' policy, though support in principle is common. There are clear environmental benefits. Will push car parking and transport problems elsewhere. Would need excellent car free alternatives to work – much better than is currently available.
Option 190: Incorporate car free development into existing policy	<ul style="list-style-type: none"> Good support. Would allow for flexibility and considers the impact of individual sites more. Use of car club spaces in conjunction with this important. May not be strong enough to deliver any areas of car free.
Option 191: Location, design and quality	<ul style="list-style-type: none"> Shortage of cycle parking around the city – especially City Centre; Lack of visitor cycle parking at new developments; Strong support for the policy; Standards should be stronger and enforced more; Cycle parking needs to be more convenient; Some over provision in terms of student and university provision.
Option 192: Update the cycle parking standards in the 2006 Local Plan	<ul style="list-style-type: none"> Support for the policy; Vital for making cycling attractive as a mode of transport; Adopt tougher standards – using best examples from elsewhere (such as Netherlands) to guide; Some overprovision in terms of student and university provision.
NEW OPTIONS ARISING FOLLOWING COMMUNITY INVOLVEMENT	
LOW EMISSION VEHICLE INFRASTRUCTURE:	
<ul style="list-style-type: none"> Incorporate parts of option 185 into other policies, such as policies arising from options that promoted non-car modes of travel, options promoting appropriate infrastructure and options setting the car parking policy. 	

Key issues raised to the Issues and Options 2, Part 2 document

SITE REFERENCE /OTHER	KEY ISSUES ARISING FROM CONSULTATION	COUNCIL'S RESPONSE	APPROACH TO THE DRAFT PLAN
Option J1 – Residential Car Parking	a. Still too much car parking in a city like Cambridge, need more car free too;	a. Agree to an extent; b. Counter	a. Car free given more of a role in policy now,

Standards	<ul style="list-style-type: none"> b. Not enough car parking pushes the problem elsewhere – provide more; c. Policy needs to be clearer for applicants. 	<ul style="list-style-type: none"> productive to provide more parking. Census shows right direction being taken; c. Noted and recognise the need to make the policy clear. 	<ul style="list-style-type: none"> as a result of consultation; b. Remain as in consultation; c. Amended the wording to achieve this, particularly in criteria.
Option J2 – Non-residential Car Parking Standards	<ul style="list-style-type: none"> d. Seem appropriate, Reasonable Levels; e. Should be no Off-Street Parking for business developments in or near the Centre; f. Must be Flexible; g. Inadequate provision – especially concerned about parking in Local Centres around Trumpington and community centres, surgeries etc; h. Businesses should provide adequate parking as often miscalculated leading to people parking on-street. Cannot change people’s behaviour they will still travel by car. 	<ul style="list-style-type: none"> d. Agree; e. Depends on use class, some essential; f. Criteria helps this; g. Criteria should cover this; h. Census shows we are going in the right direction. 	<ul style="list-style-type: none"> d. Levels remain as in consultation; e. Levels remain as in consultation; f. Levels remain as in consultation; g. Levels remain as in consultation; h. Levels remain as in consultation;
Option J4 local circumstances criteria and garage dimensions	<ul style="list-style-type: none"> i. Some good support for this as it takes account of specific local issues, especially impact on surrounding streets; j. Needs to be clearer for applicants, and strays into Highways Authority territory; 	<ul style="list-style-type: none"> i. Noted j. Cambridgeshire County Council consulted and happy, and criteria made clearer in relation to Transport Assessment’s too. 	<ul style="list-style-type: none"> i. Remains as in consultation; j. Remains as in consultation.
Option K1 cycle	<ul style="list-style-type: none"> k. Good level of support in principle; 	<ul style="list-style-type: none"> k. Noted; l. Noted, and 	<ul style="list-style-type: none"> k. Remains as in consultation;

parking	<p>l. Wording does not provide certainty on number of cycle parking spaces required (staff numbers);</p> <p>m. Lack of cycle parking in Cambridge city centre needs addressing;</p> <p>n. Cycle parking should be more convenient than car parking;</p> <p>o. Cycle parking standards still inadequate, need more;</p> <p>p. Support from University of Cambridge;</p> <p>q. Should refer to Cycle Parking in New Developments Guidance;</p> <p>r. Policy should specify exact design and layout standards.</p>	<p>agree need for policy to be clear;</p> <p>m. Transport Strategy for Cambridge and South Cambridgeshire (TSCSC) helping to deal with this along with standards;</p> <p>n. New standards ensure this;</p> <p>o. Noted and agree there is a need to be adequate to cover number of cyclists;</p> <p>p. Noted;</p> <p>q. The new standards do this;</p> <p>r. It reflects those in Cycle Parking Guide (see response to rep above).</p>	<p>l. Amended some of use classes where staff levels not as clear to “either or” (in terms of meters squared (M2));</p> <p>m. Remains as in consultation;</p> <p>n. Remains as in consultation;</p> <p>o. Been revised ‘up’ to reflect census;</p> <p>p. Noted;</p> <p>q. Remains as in consultation;</p> <p>r. Remains as in consultation.</p>
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Evidence base:

Car Parking:

- Residential Car Parking Research, Communities and Local Government (2007);
- Guidance Note: Residential Parking, CIHT (2012);
- Census, 2001 and Census 2011;
- Manual for Streets, DfT (2007) [Manual for Streets 1 and 2](#);
- Car Parking: What works where, Homes and Communities Agency (2006) [Parking What Works Where – Homes and Communities Agency](#);
- Research into the Use and Effectiveness of Maximum Parking Standards, Department for Transport (June 2008);
- Creating growth, cutting carbon: making sustainable local transport happen (DfT 2011);
- Our towns and cities: the future - delivering an urban renaissance (DETR, 2000)

Cycle Parking:

- Cambridgeshire County Council Traffic Monitoring reports;
- Census, 2001 and Census, 2011;
- Cambridge City Council - Cycle Parking Guide: for New Residential Development (2010);
- Site visits to retail and residential developments around the city;
- Danish Bicycle Parking Manual 2008.

How the policy came about:

38. The control of parking for motor vehicles and cycles at a new development is vital in Cambridge, as it is in all areas of new development, for a number of reasons.
39. Over providing car parking can lead to use of the car being more convenient than use of more sustainable modes of travel such as walking, cycling and public transport. This inevitably leads to more car trips and fewer trips on public transport and by foot and cycle. The consequence of this is additional congestion on what is often an already strained transport network in Cambridge. There are also associated negative impacts on the environment from too many car trips. Under provision of car parking can also impact negatively on a development, with the dispersal of car parking in an indiscriminate way on the surrounding streets. This can block bus and cycle lanes, and pavement parking can lead to reduced space for pushchairs and wheelchair users, and increase the parking pressures in existing settlements. All of this impacts upon safety as well as causing negative aesthetic effects for a development.
40. Sufficient car parking for disabled drivers is also imperative, in order to allow for access to new development for all. Furthermore, commercial and servicing vehicles also have requirements that need adhering to if they are not to cause blockages to the existing network.
41. Cycle parking needs to be of sufficient quality and quantity, if cycling is to be a more appealing mode of travel than the private car, and the upward trend in cycling as a mode of travel is to continue. Safe, secure cycle parking is essential to reduce the chance of bicycle theft, which is a common problem in Cambridge. Cycle parking also needs to be plentiful and of good, convenient access in order to prevent indiscriminate cycle parking surrounding development, another issue common to Cambridge.
42. The policy on parking management will help to ensure new development is delivered in a sustainable way, putting modes such as walking, cycling and public transport before car driving. As a consequence, the environmental impacts of new development will be less, safety for all users will be enhanced and the impact on the existing network, particularly with regards to

congestion, will be less. This accords with the objective to minimise adverse effects of transport on people and the environment.

Car Parking

43. The following evidence base and national guidance documents were used in the development of the car parking aspect of this policy:
- Residential Car Parking Research, Communities and Local Government (2007);
 - Guidance Note: Residential Parking, CIHT (2012);
 - Census, 2001 & Census, 2011;
 - Manual for Streets, DfT (2007) Manual for Streets 1 & 2;
 - Car Parking: What works where, Homes & Communities Agency (2006) Parking What Works Where – Homes and Communities Agency;
 - Research into the Use and Effectiveness of Maximum Parking Standards, Department for Transport (June 2008);
 - Creating growth, cutting carbon: making sustainable local transport happen (DfT 2011); and
 - Our towns and cities: the future - delivering an urban renaissance (DETR, 2000).
44. The National Planning Policy Framework (paragraph 39) and the latest national guidance on car parking standards explains the importance of local authorities using a series of key local considerations to help set any parking standards for a development. These local circumstances are listed by the National Planning Policy Framework as car ownership levels, access to public transport, walking and cycling as well as the size, mix and type of development. There is also a need to reduce the use of high-emission vehicles. All of this means that local authorities must allow for flexibility within the standards to suit different locations. This includes the type of parking provided, which should accord with best practice. This best practice is found in Manual for Streets 1 and 2 (Department for Transport) and in “Car Parking: What Works Where?” (Homes and Communities Agency 2006). Garage parking is also acceptable if it is of sufficient size and convenience, and should accord with the dimensions consulted upon in Issues and Options 2.
45. The policy approach put forward for car parking accords well with the National Planning Policy Framework, as the standards, set out as maximums (though referred to in the plan as ‘no more than’ for ease of understanding) are based on projected future car ownership levels to 2031. In addition to this, a criteria has been developed which helps to ensure that when setting the level of parking within these maximum standards, developers as well as the local planning and highway authorities can consider the specific local circumstances of a development such as the ease of access to high quality public transport in the location.

46. The policy also ensures the provision of sufficient numbers of disabled car parking, as required by paragraph 35 of the National Planning Policy Framework.
47. In terms of car parking, three options were presented during the Issues and Options (2012) consultation, which asked whether or not the current parking standards in the Cambridge Local Plan 2006 should remain as they are, or whether they should be partially or completely revised. Support was spread across these three options, with many people suggesting the current standards were about right, and others stating that more of a local consideration was needed in order to get the balance right. In addition, having lower levels of parking in Controlled Parking Zones was proposed for continuation in line with advice in national guidance. This aspect of the policy has been taken forward as a consequence of the positive consultation results.
48. As a result of the Issues and Options (2012) consultation, with a spread of support across the three options put forward, it was decided that the three options could be combined. The upshot of this is that maximum parking standards at 'origin' destinations (i.e. residential development) would be updated to accord with projected car ownership levels, as suggested by the National Planning Policy Framework and a number of other guidance documents, to ensure we weren't under or over providing car parking. In addition to this, the maximum parking standards at destination development were proposed to be kept the same, as these were seen by a number of respondents to the consultation to be around the right levels. This is a notion that was supported by the 2011 Census results, which showed that the numbers of people driving to work dropped considerably, whilst those using more sustainable modes increased. A number of responses to Issues and Options 2 consultation also verified this policy approach, with support for the proposed parking standards, as well as some calls for further reductions to be made to the numbers.
49. In order to further conform with national guidance, a local circumstance criteria was developed to ensure that each proposed new development was able to take account of the local issues set out in paragraph 39 of the National Planning Policy Framework when deciding what the level of parking provision (within the maximum levels stated) should be provided. This criteria was consulted on during Issues and Options 2, and received a number of supports.
50. However, one aspect of the criteria has been altered as a result of this consultation. Originally, one of the criteria read: *"For Major developments and developments that are likely to place significant increased demand for parking in an area, the current parking situation in the surrounding area should be considered, including the presence of parking controls; high demand for on-street parking and conflict with commuter parking. This would inform the setting of on-site parking levels within the development."*

51. Some respondents stated that they considered this facet of the criteria to be confusing, blurring the line between what are the City Council's and the Highways Authority's responsibilities. Following discussions with the Transport Assessment team at Cambridgeshire County Council, it is proposed that this part of the criteria is simplified to read: *"For developments requiring a Transport Assessment it should be demonstrated that the level of parking proposed is consistent with the recommendation of this Transport Assessment."*
52. This is appropriate as a Transport Assessment would cover the issue of car parking and any dispersal of car parking on to surrounding streets anyway.
53. During the Issues and Options 2 consultation, the appropriate dimensions for single, double and tandem garages was consulted upon. This was included to ensure that where parking (and bin storage) provision is to be in garages, the space provided is adequate enough to support this use. As a subsequence of this, displacement of parking will be minimised, and the parking provided will be secure. The dimensions for the 3 garage types are based on the council's Cycle Parking Guide for New Residential Development (2010).

Car Free and the Promotion Of Low Emission Vehicles

54. The car free aspect of the policy, along with promoting low emission vehicle infrastructure accords with paragraphs 35 and 39 of the National Planning Policy Framework. These both require the incorporation of low emission vehicle infrastructure into development and the reduction in the overall need to use high-emission vehicles.
55. Car free development all but eradicates the use of private motor vehicles at a new development if delivered successfully. As part of the Issues and Options (2012) consultation, a question was included as to whether car free could be a stand alone policy in the plan, however the balance of responses, though many favouring the principal of car free, were cautious as to its feasibility. This led to it being incorporated into the parking management policy in the Issues and Options 2 consultation. A number of responses to this proposed policy called for greater emphasis to be placed on car free development in Cambridge, and as such the position was strengthened to what is now included in policy 83, with a clear will for car free development in Cambridge, given the right circumstances. This conforms to many aspects of the National Planning Policy Framework, and is an approach being undertaken in a number of London boroughs, as well as comparative cities to Cambridge such as Oxford. Evidence from Cambridge's Census 2011 results, which show large increases in walking, cycling and public transport use in conjunction with drops in car trips for work purposes, show that there are real, viable options to the private car already in use in the city. This indicates that in some areas of Cambridge, where parking controls are feasible and alternatives to the car are viable, the option of delivering car free development is a good one.

56. The promotion of low emission vehicle infrastructure, such as car club bays and electric vehicle charging points, complement lower parking levels and even car free development, by providing genuine alternatives to the private car. Again, this conforms to the National Planning Policy Framework (paragraph 35).

Commercial and Servicing Vehicles

57. Paragraph 35 of the National Planning Policy Framework calls for development to accommodate the need for efficient delivery of goods and supplies. This policy ensures these needs are considered, and that there will not be subsequent impacts on the network surrounding a development.

Cycle Parking

58. The following evidence base and national guidance documents were used in the development of the cycle parking aspect of this policy:
- Cambridgeshire County Council Traffic Monitoring reports;
 - Census, 2001 and Census, 2011;
 - Cambridge City Council - Cycle Parking Guide: for New Residential Development (2010);
 - Site visits to retail and residential developments around the city; and
 - Danish Bicycle Parking Manual 2008.
59. Paragraph 29 of the National Planning Policy Framework states that: “transport policies have an important role to play in facilitating sustainable transport” and that “the transport system needs to be balanced in favour of sustainable transport modes, giving people a real choice about how they travel”. This policy accords with the National Planning Policy Framework in this respect, as the delivery of good quality, easily accessible cycle parking will allow for cycling to be given priority over cars as a mode at new development, facilitating the usage of this mode. The Census 2011 data indicates that this is an approach that has been largely successful in Cambridge, and something that should be continued and further promoted during the plan period. As a result of this, higher levels of cycle parking is being sought at most types of new development than is the case in the Cambridge Local Plan 2006, and in all cases the design, accessibility and quality of the cycle parking provided will be of a high standard.
60. The Interim Sustainability Appraisal (2012) promoted the various aspects of the parking management policy by stating that it should have a positive effects on addressing transport topic issues by encouraging sustainable transport, reducing Greenhouse Gas Emissions, helping climate change mitigation and having health and well being gains.
61. The various aspects to the parking management policy were consulted on as individual policy options at the Issues and Options consultation during the

summer of 2012. Further details on proposed car and cycle parking standards were then consulted upon during the Issues and Options 2 consultation in January and February of 2013.

62. In terms of cycle parking, Issues and Options (2012) asked whether the cycle parking standards should be updated and altered to ensure that the location, design and quality of the cycle parking provided should be of a higher standard. This was strongly supported on the whole, and as a result, further reviews of the cycle parking standards were undertaken ready for consultation in Issues and Options 2.
63. The new standards at Issues and Options 2 used the council's 'Cycle Parking Guide for New Residential Development 2010' as a starting point, and this was an approach that was well supported. This document is currently a material consideration in the planning process, and provides great detail on the types and dimensions of cycle parking. These aspects of the guide were proposed for continuation in the standards for the new local plan, and this was well received at consultation.
64. The Issues and Options 2 consultation also proposed that the standards (in terms of the numbers of cycle parking spaces to be provided at new developments) be consistent with those found in the 'Cycle Parking Guide for New Residential Development 2010', with some slight revisions to better reflect the usage levels in the latest travel to work figures. It was proposed at Issues and Options 2 that we should provide cycle parking for 1 in every 3 members of staff in Cambridge, given that previous travel to work figures put the numbers of residents cycling to work at between 25 and 30%, and there is a need to be positive and aspirational to the end of the plan period. This received good levels of support, though some respondents queried whether the standards went far enough, given the already good levels of cycling in Cambridge and the many areas, which have deficient levels of cycle parking available.
65. In light of the responses received calling for further increases in cycle parking and taking into account the 2011 Census results, which became available after the Issues and Options 2 consultation had finished, further increases are proposed. The Census 2011 results showed increases in cycle to work in Cambridge from 28.3% in 2001 to 31.9% in 2011. Over the life of the plan period, it can reasonably be expected that these levels of cycle commuting will increase further, so the new levels in the standards reflect this. It is now proposed that 2 cycle parking spaces should be provided for every 5 members of staff.
66. In some cases, such as at Addenbrooke's Hospital, completely new standards are proposed. The existing Addenbrooke's site has a severe shortage of cycle parking and so any new development on the site must provide good quality and abundant cycle parking. The Addenbrooke's survey shows 29% of staff cycled to work in 2011, with a trend of cycle usage going up steadily over the

last 5 yrs. The visitor spaces at the site are the same as for existing clinics and nursing homes. Other cities and towns in the UK with cycle parking standards for hospitals have a requirement to provide 1 space per 10 bedspaces. It is proposed that this standard is too low for Cambridge, due to the city's much higher cycling levels than is found elsewhere, and the existing under provision on the site. Therefore, 1 space per 6 bedspaces is proposed.

67. Another new feature of the cycle parking standards for the local plan is the greater differentiation between the needs of staff and visitors/customers (long and short stay cycle parking). This reflects the different needs of the different users. Short term users need provision as near to the main entrance as possible whilst long term users will travel further to park their cycles somewhere more secure and under cover.
68. Some respondents to the Issues and Options 2 consultation expressed concern about asking for cycle parking in terms of 'spaces per staff', citing that this created uncertainty. It is acknowledged that in some uses, particularly office uses for example, the number of staff on a site may not be finite. However, this is not the case for all uses and it is considered that where the number of staff is known, expressing the standards in this way is easier to understand than by asking for numbers in terms of gross floor area (GFA) in metre squared (m²). In order to compromise, for some uses such as office, the standards will now be expressed as "spaces per staff" as well as the current method of spaces per m² of gross floor area, with whichever provides the greatest number of spaces given preference.

Findings of the Sustainability Appraisal of the Cambridge Local Plan (July 2013)

69. The findings of the Sustainability Appraisal of the draft Cambridge Local Plan were that overall the plan would lead to significant positive effects in terms of the following SA objectives:
 - assist the creation and maintenance of inclusive, environmentally sustainable communities.
 - promote and support economic growth in environmentally sustainable and accessible locations, facilitating innovation and supporting Cambridge's role as a world leader in higher education, research, and knowledge-based industries, whilst maintaining the quality of life and place that contribute to economic success.
 - be located to help minimise the distance people need to travel, and be designed to make it easy for everyone to move around the city and access jobs and services by sustainable modes of transport.
 - ensure appropriate and timely provision of environmentally sustainable forms of infrastructure to support the demands of the city, including digital and cultural infrastructure.
 - promote a safe and healthy environment, minimising the impacts of development and ensuring quality of life and place.

70. The appraisal noted that Policy 82 sets out the maximum levels of parking provision for cars and the minimum levels of parking provision for bicycles that the Council requires for residential and non-residential development across the city. The policy places a restriction on car parking spaces yet is flexibly worded in that it allows for levels to be reduced where lower car use can reasonably be expected. The relatively high cycling space requirements, coupled with the restrictions on car parking spaces, are likely to make parking/storage of bicycles at new developments across Cambridge easier and should help reduce the use of the private car thus further increasing the use of sustainable modes of travel, particularly cycling, in the city and reducing pressure on the transport network.
71. The appraisal noted that the combination of Policies 80-82 seek to achieve a modal shift in sustainable transportation by limiting accessibility to private vehicles; promoting sustainable transport; requiring Transport Plans to be submitted for major developments; restricting parking with 'maximum' parking allowances; enhancing the provision of electric vehicle charging infrastructure and encouraging journeys made by cycling by requiring 'minimum' cycle parking spaces. Cambridge already has one of the highest percentages in Europe in terms of cycling and such policies would further improve infrastructure for current and future cyclists. In combination, these policies should reduce transport emissions and reduce pressure on the Air Quality Management Area.
72. The appraisal noted that Policies 80, 81, 82 and 85, given the amount of development to be brought forward over the plan-period and the peripheral location of much of this development, these policies appear likely to result in significant positive effects.

Key Issues raised during Proposed Submission consultation

Policy 82: Parking Management	
Total Representations: 11	
Object: 11	Support: 0
Objections	<ul style="list-style-type: none"> • The policy departs from the NPPF as it retains maximum standards for non-residential development; • Delete reference to car parking levels being maintained at current levels for shoppers, residents and workers; as it is unclear, onerous and unnecessary; • Need more recognition of need for parking provision for disabled people; • The result of the continuing increase in residents' parking schemes across the city is to reduce the parking options for shoppers and workers. In addition, the proposed restrictions on car parking levels in new developments will put pressure on street parking. • Key principles should be in policy text not in appendices or

	<p>supporting documents;</p> <ul style="list-style-type: none"> • Apply a more flexible, demand-based approach to assessing car parking provision. This is less prescriptive and more responsive to local circumstances; • Pavement parking should be banned across the city in cooperation with County Transport Strategy and through Traffic Regulation Order issues by the Highway Authority with the exception of narrow streets, where marked bays could be added in consultation with residents. The plan should identify these areas. • Cycle parking standards are too onerous for Anglia Ruskin University considering close links to bus interchange and residential accommodation; • Policy in relation to cycle parking does not go far enough and has not learnt from past deficiencies in cycle parking provision. More detail about the standard of cycle parking expected needs to be provided; • Draft Policy 82 should be revised to allow for the provision of higher than maximum parking standards for non-residential development subject to justification in a Transport Assessment.
Support	Not applicable

Minor Modifications suggested following Proposed Submission consultation and implications for Sustainability Appraisal

73. No changes to Policy 82: Parking management or the supporting text are suggested in the Addendum to the Cambridge Local Plan 2014: Proposed Submission document. There are therefore no impacts on the findings of the Sustainability Appraisal.

Policy 83: Aviation development

EXISTING POLICY TO BE REPLACED (2006 CAMBRIDGE LOCAL PLAN)	OPTION(S) BEING TAKEN FORWARD FROM THE ISSUES AND OPTIONS REPORT (2012) AND ISSUES AND OPTIONS 2 (2013)	OPTION(S) NOT BEING TAKEN FORWARD FROM THE ISSUES AND OPTIONS REPORT (2012)
<ul style="list-style-type: none"> • Policy 8/12 Cambridge Airport 	<ul style="list-style-type: none"> • Option 198 Cambridge Airport – Aviation Development 	Not applicable

Key issues raised during Issues and Options (2012) and Issues and Options 2 (2013) consultations:

SECTION OF THE ISSUES AND OPTIONS REPORT (2012)	KEY ISSUES ARISING FROM CONSULTATION
Option 198: Cambridge Airport - Aviation Development	<ul style="list-style-type: none"> • A policy supportive of employment and aviation will help enhance the economic growth of the Cambridge area. Access by air is important to global companies in Cambridge and will help attract further similar investment. Marshalls is an important employer; • Support policy not to expand because of concerns about increased air traffic and impact on residential amenity and climate change and an increase in noise pollution; • Likely to help minimise the impact on environment and biodiversity. • Development of the airport should be welcomed not restricted; • We must consider the economic benefits of a thriving local airport; • Specific reference could be made to pollution – noise and air; • Residents living under the flight path suffer negative impacts; • Increase in air traffic would be detrimental; • We need to support such an established employer; • Aerobatics causes more disturbance than commercial flights; • Noise caused by aviation activity is a blight.

Evidence base:

- Department for Transport (2013). The Aviation Policy Framework

How the policy came about:

74. In preparing their local plans, local planning authorities are required to have regard to policies and advice issued by the Secretary of State, including the Aviation Policy Framework as relevant to a particular local authority area. The Aviation Policy Framework (March 2013) may also be a material consideration in planning decisions depending on the circumstances of a particular application.
75. Respondents to the Issues and Options consultation (Summer 2012) commented that the airport, for both employment and aviation reasons, was important to the economic success of the city. However, balancing this

importance, respondents also commented on the impact of increased air traffic on residential amenity, climate change, noise and air pollution, and biodiversity. In the sustainability appraisal which accompanied the Issues and Options report, it was reported that this option should help mitigate adverse impacts of development on the health and well-being of Cambridge residents and upon the environment and biodiversity. It was also noted that the economic effects of this policy approach were uncertain.

76. Land at Cambridge East was taken out of the Cambridge Green Belt in the Cambridge Local Plan 2006 and Cambridge East Area Action Plan 2008 for the development of a major new urban extension. This was dependent on the current operator relocating, something they were actively seeking to do at the time. In 2010, it became clear that the site operator could not find a new site to relocate to and they announced that they would remain at the Airport for the foreseeable future. This left the councils with decisions to be made as to how to plan for land at Cambridge East, with residential development across the wider site unlikely in the plan period.
77. In June 2012, Cambridge City Council consulted upon three broad options in the Issues and Options consultation as to how Cambridge East should be planned for. These were:
 - Retain the current allocation – this would keep the area as a housing allocation for a major new urban quarter. However, the full level of housing provision would not be relied upon in plans, as it would be unlikely to be developed. This approach would provide flexibility if development could occur in the plan period, although it would also create uncertainty, and residential delivery options elsewhere would still have to be explored.
 - Safeguard the land – this would keep the area as ‘safeguarded land’ that could be developed in the longer term, outside the plan period. This would allow a future review of the plan to consider the wider site again if circumstances change.
 - Return the land to the Green Belt – this would return the site in whole or in part to the Cambridge Green Belt, on the basis that development would not occur.
78. In reviewing the future options for this large site, Cambridge City Council and South Cambridgeshire District Council have concluded that it is appropriate that this site remain out of the Green Belt and safeguarded as a strategic reserve of land that may be developed at a later date. There is also potential for residential development for a number of parcels of land while the airport remains on the site. Careful consideration of how the ongoing airport activities will interact with any new residential use will need to be made, to ensure that the new residences have an acceptable level of amenity, and that they do not impede on the ongoing use of the airport. In terms of how any development may impede on the ongoing use of the airport, it will be for the airport

operators to demonstrate how the development does this. Furthermore, any development that comes forward in advance of the wider site will have to be carefully planned such that it is capable of working both with and without the wider development.

Findings of the Sustainability Appraisal of the Cambridge Local Plan (July 2013)

79. The findings of the Sustainability Appraisal of the draft Cambridge Local Plan were that overall the plan would lead to significant positive effects in terms of the following SA objectives:
 - promote and support economic growth in environmentally sustainable and accessible locations, facilitating innovation and supporting Cambridge’s role as a world leader in higher education, research, and knowledge-based industries, whilst maintaining the quality of life and place that contribute to economic success.

80. The appraisal noted that states that aviation development at Cambridge Airport will only be supported where it would not have a significant adverse impact on the environment and on residential amenity. The phrasing of this policy implies that a ‘non-significant’ adverse environmental impact would be acceptable, and increased air transport at the airport could lead to negative effects in terms of climate change mitigation.

81. No adverse impacts from this policy on the sustainability objectives were predicted as part of the Sustainability Appraisal process.

Key Issues raised during Proposed Submission consultation

Policy 83: Aviation Development	
Total Representations: 6	
Object: 2	Support: 4
Objections	<ul style="list-style-type: none"> • Given the airport’s importance to the economy and the requirements of the NPPF, the policy should be worded as “The development and use of Cambridge International Airport for employment and aviation will be supported subject to not causing unacceptable environmental harm”; • The policy lacks any specific measurement of term "significant adverse impact”; • It is also based entirely on monitoring through control of planning applications (Appendix M) which is not satisfactory as cumulative permitted development, in addition to intensification of use, allows substantial increases in activity; • Aviation is unsustainable and resources would be better spent on improving rail and cycle networks; • The use of the airport as an international airport is a significant threat to quality of life in the southern part of Cambridge.

Support	<ul style="list-style-type: none"> Increased noise from expanded operations at the airport has a major impact on health and wellbeing and must be carefully monitored; This policy must be applied in instances where planning permission is required for development at the airport.
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Minor Modifications suggested following Proposed Submission consultation and implications for Sustainability Appraisal

82. No changes to Policy 83: Aviation development or the supporting text are suggested in the Addendum to the Cambridge Local Plan 2014: Proposed Submission document. There are therefore no impacts on the findings of the Sustainability Appraisal.

Policy 84: Telecommunications

EXISTING POLICY TO BE REPLACED (2006 CAMBRIDGE LOCAL PLAN)	OPTION(S) BEING TAKEN FORWARD FROM THE ISSUES AND OPTIONS REPORT (2012) AND ISSUES AND OPTIONS 2 (2013)	OPTION(S) NOT BEING TAKEN FORWARD FROM THE ISSUES AND OPTIONS REPORT (2012)
<ul style="list-style-type: none"> Policy 8/14 Telecommunications 	<ul style="list-style-type: none"> Option 199 Telecommunications criteria based policy 	Not applicable

Key issues raised during Issues and Options (2012) and Issues and Options 2 (2013) consultations:

SECTION OF THE ISSUES AND OPTIONS REPORT (2012)	KEY ISSUES ARISING FROM CONSULTATION
Option 199: Telecommunications criteria based policy	<ul style="list-style-type: none"> Agree that consultation should take place before installation near a school or college; Should prevent masts/sites within an agreed distance (say 50m) of any residential property; There should be a policy that limits electromagnetic field intensities; Has the impact of existing masts been assessed locally? It is insufficient to state that 'significant interference' should be used as a test, a tighter definition should be used. The requirement to consult should not be limited to immediate neighbours of the site; The provision of telecommunications infrastructure can have a major impact on transport network requirements; The Council needs to encourage the installation of fibre

	<p>optics across the city;</p> <ul style="list-style-type: none"> • The highway authority should be consulted where appropriate
<p>NEW OPTIONS ARISING FOLLOWING COMMUNITY INVOLVEMENT</p>	
<p>It is insufficient to state that ‘significant interference’ should be used as a test, a tighter definition should be used. The requirement to consult should not be limited to immediate neighbours of the site.</p>	

Evidence base:

- National Planning Policy Framework (2012)

How the policy came about:

83. New communications technology is continually developing and it is important that residents and businesses have the best access to new technology. It is important that the Council supports the growth of telecommunications systems while keeping the environmental impact to a minimum. The National Planning Policy Framework supports this aspiration (paragraphs 42 – 46). The Interim Sustainability Appraisal of the Issues and Options Report (2012) noted that a criteria based policy for the siting, design, appearance, and impact mitigation of telecommunication developments may result in mitigating concerns regarding visual, health and landscape impact concerns. The proposed criteria should also help address issues relating to the quality of the built environment, open spaces and conservation areas across the city.
84. Responses to the Issues and Options consultation were generally supportive of the development of a telecommunications policy, with some suggested additions to the criteria contained within the policy. There was one suggestion that a tighter definition than ‘significant interference’ should be used. In response to this, the wording of the policy has been changed to ‘significant and irremediable interference’ to reflect the wording in the National Planning Policy Framework (paragraph 44). Reference to consultation with the relevant highways authority where works are in the highway or close to the Cambridgeshire guided busway has also been added. A separate policy dealing with high speed digital infrastructure will also be added to the local plan.
85. The aim of this policy is to guide and support telecommunications development while keeping the environmental impact to a minimum. While the council is aware of public concerns regarding the health impacts of telecommunications development, the National Planning Policy Framework sets out that it is not the role of local planning authorities to consider further health aspects if a proposal meets the International Commission on Non-Ionizing Radiation Protection (ICNIRP) guidelines for public exposure.

Findings of the Sustainability Appraisal of the Cambridge Local Plan (July 2013)

86. No adverse impacts from this Policy on the sustainability objectives were predicted as part of the Sustainability Appraisal process.

Key Issues raised during Proposed Submission consultation

Policy 84: Telecommunications	
Total Representations: 3	
Object: 3	Support: 0
Objections	<ul style="list-style-type: none"> • Criterion b of the policy implies a presumption in favour of development. Permission should be granted for fixed term periods of five years and there should be a requirement to remove old and redundant equipment/masts cabling before new equipment can be fitted; • Remove criterion (c) as it duplicates national guidance and legislation; • Criterion (c) of the policy is too vague regarding the issues which the development will be assessed against; • In paragraph 9.36 supporting the policy, reference should be made to the need for facilities specifically for disabled people.
Support	<ul style="list-style-type: none"> • Not applicable

Minor Modifications suggested following Proposed Submission consultation and implications for Sustainability Appraisal

87. No changes to Policy 84: Telecommunications or the supporting text are suggested in the Addendum to the Cambridge Local Plan 2014: Proposed Submission document. There are therefore no impacts on the findings of the Sustainability Appraisal.

Policy 85: Infrastructure delivery, Planning Obligations and the Community Infrastructure Levy

EXISTING POLICY TO BE REPLACED (CAMBRIDGE LOCAL PLAN 2006)	OPTION(S) BEING TAKEN FORWARD FROM THE ISSUES AND OPTIONS REPORT (2012) AND ISSUES AND OPTIONS 2 (2013)	OPTION(S) NOT BEING TAKEN FORWARD FROM THE ISSUES AND OPTIONS REPORT (2012)
Policy 10/1 Infrastructure improvements	Option 201 Provision of infrastructure and services	Not applicable

Key issues raised during Issues and Options (2012) and Issues and Options 2 (2013) consultations:

SECTION OF THE ISSUES AND OPTIONS REPORT (2012)	KEY ISSUES ARISING FROM CONSULTATION
Option 201 – Provision of Infrastructure and Services	<ul style="list-style-type: none"> • Green Infrastructure and open spaces provision could enhance biodiversity and it is therefore welcomed; • Improvements and provision for infrastructure would need to be proportionate and related to the scale of development proposed taking account of the developments own impact on local infrastructure whilst not providing infrastructure to make up existing deficiencies; • All new developments need infrastructure and services • Developers should be required to support the provision of infrastructure; • It is important to ensure policies are robust so that they cannot be challenged by developers; • Support and note that the list in Option 201 is ‘not exhaustive’; • Planning obligations/CIL are one of a number of essential sources to deliver the Cambridgeshire Green Infrastructure Strategy and the 2006 Nature Conservation Strategy; • New developments usually generate traffic and other problems, which create costs to existing users; it is not acceptable for a developer to offload these externalities onto the taxpayer, and so the CIL/S106 payments ensure that these costs are properly accounted for; • Infrastructure must be in place before any development is occupied. • Major developments should meet their own infrastructure needs and this provision should be completed before the overall scheme is complete; • The policy should ensure developer contributions to non-vehicular infrastructure should be encouraged; • The Plan should provide a realistic and deliverable strategy which identifies the key infrastructure constraints and highlights how any constraints will be overcome. It is essential that the development strategy can be delivered and implemented with reasonable confidence; • Any policy should ensure that contributions from developers should only be sought where necessary to

SECTION OF THE ISSUES AND OPTIONS REPORT (2012)	KEY ISSUES ARISING FROM CONSULTATION
	<p>make a scheme acceptable in planning terms and should be fair and reasonable in both scale and kind. The level of contributions sought should strike a balance between the need for funding and the impact on the viability of development;</p> <ul style="list-style-type: none"> • There is no statement about how the policy will be monitored and enforced; • There is a lack of transparency and a democratic deficiency with regard to how S.106 monies are collected and spent.

Evidence base:

- Peter Brett Associates (2012). Draft Cambridge City and South Cambridgeshire Joint Infrastructure Delivery Study (2012);
- Community Infrastructure Levy Viability Assessment;
- SHLAA and Potential Site Allocations High Level Viability Assessment; and,
- The Cambridge City Council Local Plan – Student Housing Affordable Housing Study (Summer 2013).

How the policy came about:

88. It is important that the council ensures the delivery of new or improved infrastructure to support development in a timely and phased manner. This will be an important element in ensuring the appropriate and sustainable implementation of new growth. As part of planning for infrastructure provision the council needs to consider the role that developers can play in helping to provide infrastructure to support growth.
89. Paragraph 157 of the National Planning Policy Framework requires local planning authorities to plan positively for the development and infrastructure required in the area.
90. Paragraph 156 of the National Planning Policy Framework requires that Local Plans include policies to deliver:
- The provision of infrastructure for transport, telecommunications, waste management, water supply, wastewater, flood risk and coastal change management, and the provision of minerals and energy (including heat); and
 - The provision of health, security, community and cultural infrastructure and other local facilities.

91. Planning for infrastructure provision has been an ongoing process through the development of an Infrastructure Delivery Study (IDS), first commissioned in 2009, and partnership working with stakeholders. The IDS has been produced in collaboration with South Cambridgeshire District Council and will form part of the Council's case at submission and examination of the Local Plan.
92. Paragraph 21 of the National Planning Policy Framework states that in drawing up Local Plans, local planning authorities should identify priority areas for the provision of infrastructure. The Infrastructure Delivery Study (IDS) will set out when and where infrastructure will need to be provided, the scale of funding needed to achieve this and potential sources of funding. The IDS will also identify infrastructure critical to the delivery of the Local Plan.
93. Traditionally, infrastructure funding has been secured from developers through legal agreements known as 'planning obligations.' Planning obligations (Section 106 Agreements or S106) are voluntary legal obligations attached to planning applications. This is the approach currently taken by the council and details of that approach are set out in the Cambridge City Council Planning Obligations SPD – March 2010.
94. More recently the Government has introduced the Community Infrastructure Levy (CIL). The CIL was introduced in the Planning Act 2008 and put into force by the Community Infrastructure Regulations 2010 (as amended) on 6 April 2010. In order to adopt CIL the council needs to prepare and adopt a CIL Charging Schedule. The council committed to taking a CIL forward in parallel with its Local Plan Review at Development Plan Scrutiny Sub-Committee on 22-03-2011. A six week consultation on the Cambridge CIL Preliminary Draft Charging Schedule concluded on April 29th 2013. The CIL is intended to supplement (not replace) other funding streams. A number of contributions will still be acquired through S.106 Planning Obligations. These include affordable housing requirements and site specific on site infrastructure necessary to make a development acceptable in planning terms.
95. Paragraph 173 of the National Planning Policy Framework is clear that the sites and scale of development identified in the Local Plan should not be subject to such a scale of obligations and policy burdens that their ability to be developed viably is threatened. It states that: *"In order to ensure viability, the costs of any requirements for affordable housing, standards, infrastructure contributions or other requirements should, when taking account of the normal cost of development and mitigation, provide competitive returns to a willing landowner and willing developer to enable the development to be deliverable."*
96. The potential impacts of this policy on viability have been taken into account in a suite of viability documents produced on behalf of the council. These are The Cambridge City Council Local Plan – Community Infrastructure Levy Viability Assessment; The Cambridge City Council Local Plan - SHLAA and Potential Site

Allocations High Level Viability Assessment; and, the Cambridge City Council Local Plan – Student Housing Affordable Housing Study (Summer 2013).

97. At Issues and Options the majority of respondents were in favour of this policy option to continue to seek funding from developers for infrastructure requirements related to new developments. Some concerns were raised about the monitoring and enforcement of this policy and also that there is a lack of transparency with how S.106 monies are collected and spent.
98. The Interim Sustainability Appraisal of the Issues and Options Report (2012) noted that this policy option is likely to contribute to positive effects across multiple sustainability topics and thematic areas. Health, leisure and community facilities can contribute to wellbeing. Improvements to water, and flood protection infrastructure can also bring benefits. Green infrastructure and open spaces provision could enhance biodiversity. Furthermore this option should help maintain cultural facilities and improve the quality of the open and built environment citywide. The sustainability benefits of this option on the transport and renewable energy sustainability topics will depend on the nature of the infrastructure and services provided and therefore it is difficult to appraise them with any certainty at this stage.

Findings of the Sustainability Appraisal of the Cambridge Local Plan (July 2013)

99. The findings of the Sustainability Appraisal of the draft Cambridge Local Plan were that overall the plan would lead to significant positive effects in terms of the following SA objectives:
 - be located to help minimise the distance people need to travel, and be designed to make it easy for everyone to move around the city and access jobs and services by sustainable modes of transport.
 - promote social cohesion and sustainability and a high quality of life by maintaining and enhancing provision for open space, sports and recreation, community and leisure facilities, including arts and cultural venues that serve Cambridge and the sub-region
 - promote a safe and healthy environment, minimising the impacts of development and ensuring quality of life and place.
100. The appraisal noted that Policy 85 states planning obligations shall be sought for transport infrastructure which should further achieve these aims. This will ensure that strategic new development will improve walking, cycling and public transport provision for existing and future residents, reducing per capita emissions from transport sources.
101. The appraisal noted that by securing financial contributions to create and enhance green infrastructure has the potential to generate significant positive effects in terms of Cambridge's biodiversity. Furthermore, it is vital with regards to provision of such facilities. It states that new development must be

supported by required infrastructure and, where existing infrastructure will be placed under strain due to the impact of new development, improvements to existing infrastructure or compensatory provision should be made. These measures should help to ensure that there is no reduction in the City’s overall provision of community related infrastructure. In addition, the Policy makes clear that planning obligations and/or future CIL money could be used to provide key community infrastructure. As a result, this Policy is predicted to result in significant positive effects.

102. The appraisal noted that the combination of Policies 13, 85 and 26 should ensure the delivery of critical infrastructure which should help Cambridge to manage flood risk and adapt to the risks of climate change.

103. The appraisal noted that Policies 80, 81, 82 and 85, given the amount of development to be brought forward over the plan-period and the peripheral location of much of this development, these policies appear likely to result in significant positive effects.

Key Issues raised during Proposed Submission consultation

Policy 85: Infrastructure delivery, planning obligations and the Community Infrastructure Levy	
Total Representations: 142	
Object: 136	Support: 6
Objections	<ul style="list-style-type: none"> • Petersfield has the least public green open space per person in the city, despite the inclusion of Fenners (which is not open to the public) and the cemetery in calculations. Either restore the Howard Mallett Centre to its original use as a community, sports and leisure facility for the area or return the site to public open space with the facility replaced and relocated elsewhere; • The local plan repeatedly refers to the need for affordable housing and community facilities – yet the council’s track record in enforcing this is poor, exemplified by the Station Area. Legal requirements for open space, community facilities and affordable housing should be enforced; • Specific amounts of open space and community facilities need to be provided on the R10 Mill Road Depot site; • Developers must contribute legal requirements for minimum open space, community facilities and affordable housing; • The Community Infrastructure Levy charges as well as the scope, timing and review periods need to be defined more clearly; • The policy needs to be tightened up to ensure that planning consents can require completion of infrastructure before occupation (this could be phased in very large developments); • There should be public consultation where changes to the

	<p>public realm are proposed in relation to new development, subject to agreement by elected representatives;</p> <ul style="list-style-type: none"> • Key transport infrastructure (including cycling/walking routes) must be in place from the start of development; • ‘Heritage assets’ should be included in the list, in Policy 85, that will be eligible for funding from S.106 contributions as they will sometimes be required towards the conservation or enhancement of heritage assets; • Policy 85 would benefit from reference to viability considerations that are clearly relevant to the issue; • Greater clarity should be provided over the range of matters to be the subject of planning obligations, and greater recognition should be given to the need for flexibility and awareness of market conditions so that planned development is not hindered; • For the avoidance of doubt, reference should be made in Policy 85 to test Section 122 of the CIL Regulations 2010; • Necessary infrastructure to mitigate the impact of GB1 Land north of Worts’ Causeway and GB2 Land south of Worts’ Causeway has not been identified. This is in terms of the impact on biodiversity (ecological corridors are not an appropriate solution) and the impact on transport infrastructure. The roads around the hospital are already reaching crisis point and neither Worts’ Causeway nor Lime Kiln Road are wide enough to take cycle paths; • All provisions that come within the remit of this policy and the legal agreements that underpin and ensure delivery to a specific timetable for a proposal should have reached signature by the time the relevant application is brought before the relevant planning committee for consideration; • Insufficient weight is given to cultural and community infrastructure in relation to S106 and CIL contributions. The role of churches supporting communities should be given more consideration.
Support	<ul style="list-style-type: none"> • Support the inclusion of bullet point (k) green infrastructure within this policy. It will be essential that detailed work on CIL and the Infrastructure Delivery Study includes identified green infrastructure needs; • Early developer engagement with the wastewater provider is essential to ensure the timely delivery of infrastructure to serve new development and could be set as a requirement in policy. Anglian Water would not expect wastewater infrastructure to be included in CIL; • Paragraph 9.42: Welcome the inclusion of play space under ‘Necessary Infrastructure’.

Minor Modifications suggested following Proposed Submission consultation and implications for Sustainability Appraisal

104. Following the Proposed Submission consultation, a change to Policy 85 was suggested for clarity and to ensure the local plan is compatible with the emerging Cambridge Community Infrastructure Levy and the Community Infrastructure Levy Regulations (2010 as amended). This change is in the Addendum to the Cambridge Local Plan 2014: Proposed Submission document marked as PM/9/004. PM/9/004 suggests that two additional sentences are placed at the end of the final paragraph of Policy 85. This change reads as follows:

“The introduction of CIL in ~~2014~~ 2015 will be accompanied by a review of the Council’s guidance on planning obligations, and will ensure that the range and level of contributions towards local infrastructure needs are kept up to date and maximised in the context of emerging CIL practice and guidance. The guidance on planning obligations will be adopted alongside a CIL charging schedule and a CIL Regulation 123 list. These documents will clarify what infrastructure types/projects the Council will seek to fund via a CIL and for what infrastructure types/projects the Council will seek to secure via planning obligations.”

105. Following consideration of the impact of this change on the Sustainability Appraisal Framework, it has been concluded that this change does not materially alter the findings of the Sustainability Appraisal.

AUDIT TRAIL: APPENDIX A: THE DEVELOPMENT PLAN FOR CAMBRIDGE

1. Appendix A: The Development Plan for Cambridge within the Cambridge Local Plan 2014: Proposed Submission document was drawn together for the Proposed Submission consultation. This appendix does not contain any policies and is not directly related to any policies, and therefore has not had an audit trail before this stage of plan-making. However, as representations could be made to this section during the Proposed Submission consultation, key issues arising from consultation and any proposed minor modifications are included below.

Key Issues raised during Proposed Submission consultation

Appendix A: The Development Plan for Cambridge	
Total Representations: 2	
Object: 1	Support: 1
Objections	<ul style="list-style-type: none"> • With reference to section A.2 of this Appendix A, English Heritage recommends consideration of a Heritage Strategy for the city, drawing on, updating and, as necessary, supplementing the existing evidence base, including conservation area appraisals and management plans. This would help underpin the implementation of the plan, and enable the prioritisation of projects large and small, to take forward positive enhancement of the city's heritage assets. The Historic Core Character Appraisal should be referred to, however this document should also be brought up to date.
Support	<ul style="list-style-type: none"> • Support for the inclusion of allocations/designations made by the Cambridgeshire and Peterborough Minerals and Waste Development Plan.

Minor Modifications suggested following Proposed Submission consultation and implications for Sustainability Appraisal

2. As a result of a representation (Representation Number 28343) made during the Proposed Submission consultation, a minor modification to paragraph A.1 is suggested for clarity. This change is in the Addendum to the Cambridge Local Plan 2014: Proposed Submission document marked as PM/A/001 and reads:

“On adoption of this plan, the official statutory development plan for Cambridge comprises:

- Cambridge Local Plan 2014;
- Cambridgeshire and Peterborough Minerals and Waste ~~Local Development Framework~~ Core Strategy (July 2011); and Site Specific Proposals Plan (February 2012) Development Plan Documents;

- Cambridge East Area Action Plan (excluding policies CE/3 and CE/35, which are replaced by Policy 12: Cambridge East); and
- North West Cambridge Area Action Plan.

The Cambridge Local Plan 2006 is deleted in its entirety and no longer forms part of the development plan.”

3. Following consideration of the impact of this change on the Sustainability Appraisal Framework, it has been concluded that this change does not materially alter the findings of the Sustainability Appraisal.

AUDIT TRAIL: APPENDIX B: PROPOSALS SCHEDULE

1. Appendix B: Proposals Schedule within the Cambridge Local Plan 2014: Proposed Submission document was drawn together for the Proposed Submission consultation. This appendix does not contain any policies, but is related to a number of policies in Section Three: City Centre, Areas of major Change, Opportunity Areas and Site Specific Proposals. The proposed sites allocations have formed part of an audit trail before this stage of plan-making as they were consulted on as a part of Issues and Options 2 consultation. The sites' audit trails were formerly located in Appendix 6 of the Statement of Consultation. A small number of sites in the city were rejected at Issues and Options 2 consultation and these sites are still addressed in Appendix 6 of the Statement of Consultation. However, as representations could be made to this section during the Proposed Submission consultation, key issues arising from consultation and any proposed minor modifications to allocated sites are included below in Appendix 3.
2. This Appendix is part of the audit trail setting out the origination and evaluation of sites brought forward for allocation in the Cambridge Local Plan 2014: Proposed Submission. The full audit trail to date includes:
 - the identification of sites through the Strategic Housing Land Availability Assessment, May 2012;
 - site and issues raised through the Issues and Option 1 stage of the Plan preparation, July 2012;
 - the detailed assessment of sites in *Issues and Options 2, Part 2 Site Options Within Cambridge – January 2013: Technical Background Document - Part 2*;
 - the Issues and Options 2 Parts 2 consultation on specific sites and responses to this consultation;
 - the detailed assessment of sites U3 (Grange Farm) and R44 (Betjeman House), June 2013;
 - the Proposed Submission consultation on specific sites and responses to this consultation.
3. The schedules relating to sites in Appendix B address the responses to proposed site allocations received during the Issues and Option 2: Part 2 consultations. The approach has been to:
 1. Summarise the issues under sub heading of support, object and comment;
 2. Distil out a small number of key issues that fundamentally affect the appropriateness of allocating the site; and
 3. Set out a short response to these issues.
4. A red, amber or green ranking was awarded to each site following Issues and Options 2 consultation on the basis of this analysis:

Red – Major planning objections to the allocation;
 Amber – Significant planning concerns expressed, but can be addressed;
 Green – No significant planning objections to the allocation (including any existing Local Plan and Area Action Plan sites).

5. For Proposed Submission consultation, the approach was to:
1. Summarise the issues under sub heading of support or object;
 2. Distil out a small number of key issues that fundamentally affect the appropriateness of allocating the site; and
 3. Set out any proposed minor modifications to the allocation as a result of the Proposed Submission consultation and any consequent effects on the SA.

Key Issues raised during Proposed Submission consultation

Appendix B: Proposals Schedule (Representations submitted to Appendix B in general)	
Total Representations: 7	
Object: 6	Support: 1
Objections	<ul style="list-style-type: none"> • Further sites for allocation: <ul style="list-style-type: none"> ○ Allocate the Triangle (Cambridge University Press) for employment/office use; ○ Allocate land at the corner of Milton Road and Gilbert Road as a mixed use allocation with permissible uses being an aparthotel, residential use and community uses; ○ SPO 06 Cambridge Tennis and Hockey Club and SPO 16 Emmanuel College Playing Field should be allocated for residential use. The site is 6.6 hectares and with 2.8 hectares of open space to be created could accommodate 80 dwellings; ○ Sites AGS 62 The Pightle and Principals Lodge, P&G 40 Newnham College Gardens, and SPO 33 Newnham College Playing Field, should be removed from the Council's Designation Schedule at Appendix C and the following areas should be allocated for college use at Appendix B: <ul style="list-style-type: none"> ▪ Site B - Strachey & Porters Lodge - The redevelopment of the site of the existing building to provide a new and more appropriate entrance, porter's lodge, larger, en-suite rooms, and other student facilities including but not restricted to a central laundry and new social space. The proposed redevelopment would re-enforce the landscaping links between the College and Rosalind Franklin, enhancing the character of the area. ▪ Site E - Grange Road - Possibly continuation of the range of Champneys building. This 'Front of House' location is most suitable for a high quality development of student

	<p>en-suite rooms.</p> <ul style="list-style-type: none"> ▪ Sites F/G/H - Barton Road & Tennis Courts - Proposed relocation of tennis courts from site F onto site G, including the provision of new changing facilities on site H, closer to the main College. Site E could then be redeveloped to provide further student accommodation, likely to be specifically designed to accommodate the requirements of post-graduate students (both taught and research graduates). • Need for infrastructure delivery to be identified for each site within the proposals schedule in order to ensure a coherent strategy for sites coming forward; • Need for a third round of consultation on the capacity of sites.
Support	<ul style="list-style-type: none"> • General support for the allocation of sites R14 BT Telephone Exchange, Long Road, R16 Cambridge Professional Development Centre, and R42c Glebe Farm 2 within Appendix B: Proposals Schedule.

Minor Modifications suggested following Proposed Submission consultation and implications for Sustainability Appraisal

6. A minor modification to the first footnote in Appendix B is suggested for clarity. This change is in the Addendum to the Cambridge Local Plan 2014: Proposed Submission document marked as PM/B/001 and reads:

“Approximate number based on initial assessment in Strategic Housing Land Availability Assessment (SHLAA); final number may be greater or smaller depending on detailed assessment and detailed design. For mixed use sites, the uses and figures quoted should be regarded as giving a broad indication of the council’s expectations.”
7. Following consideration of the impact of this change on the Sustainability Appraisal Framework, it has been concluded that this change does not materially alter the findings of the Sustainability Appraisal.

Site GB1: Land north of Wort's Causeway

Key issues raised during Issues and Options 2 (2013) consultation

8. The key issues from Issues and Options 2: Part 1 consultation relating to this site can be found in Appendix 5 of the Statement of Consultation.

Key Issues raised during Proposed Submission consultation

Site GB1: Land north of Worts' Causeway	
Total Representations: 96 (including a petition signed by 2,025 people)	
Object: 93 (including a petition signed by 2,025 people)	Support: 3
Objections	<ul style="list-style-type: none"> • Petition signed by 2,025 people and other respondents opposing the further destruction of the Cambridge Green Belt on the basis of: <ul style="list-style-type: none"> ○ Lack of exceptional circumstances to justify release of Green Belt land; ○ Urban sprawl impacting on the historic and compact character of the city, its surrounding villages and countryside and impact on traffic congestion; ○ Plans being based on out-of-date growth forecasts and first consideration should be given to greater re-use of existing brownfield sites not in the Green Belt. • Commercial Estates Group objected to the site allocation on the basis of: <ul style="list-style-type: none"> ○ Insufficient evidence to demonstrate the deliverability and density of a number of allocated sites; ○ Insufficient release of land to deliver housing and employment development to meet objectively assessed needs; ○ Plans rely on infrastructure of high cost and uncertain delivery; ○ Plans do not promote sustainable transport; ○ Spatial distribution of development undermines the economic competitiveness of Cambridge; ○ Need for a joint plan for Cambridge and South Cambridgeshire to deliver growth; ○ Incorrect application of national Green Belt policy and flawed methodology for analysis of landscape value; ○ Flawed sustainability appraisal of the plans; ○ Need for greater land release from the Green Belt in both Cambridge and South Cambridgeshire to deliver between 3,300 and 4,400 homes and 10 hectares of employment land within the plan period. • Teversham Parish Council objected to the site allocation on the basis of:

	<ul style="list-style-type: none"> ○ These proposals are contrary to the five purposes served by the Green Belt as identified in the NPPF because they would provide only 3% of the projected housing need, the 'very special circumstances' required to justify harm to land of high Green Belt value do not exist. ○ Development of GB sites (1, 2, 3, 4 and 5) would have a major detrimental impact on the nearby Nature reserves and would constitute urban sprawl which would damage the setting of the city. <ul style="list-style-type: none"> ● Retain existing agricultural use; ● Loss of Green Belt land in food production; ● Impact on flood risk;[● Impact on neighbouring amenity; ● Impact on biodiversity, including red list species and strategically important wildlife habitats; ● Impact on footpaths, setting and compact nature of the city; ● Impact on gateway to the city, views and landscape character of area, particularly given the proximity of site to Gog Magog Down, the Beechwoods and Wandlebury; ● Set out provision for strategic green infrastructure and ecological enhancement within the allocation; ● Establish a green corridor linking the head of Hobson's Conduit through to Gog Magog Down, the Beechwoods and Wandlebury; ● Poor access onto Worts' Causeway; ● Impact on community infrastructure, such as education and primary healthcare; ● Impact on congestion on local roads, which are already heavily used; ● Impact on bus services, including Park and Ride bus; ● Distance to services is unsustainable and would encourage car use; ● Gas infrastructure below ground on site will impact on developability; ● Lack of infrastructure plan for the site; ● Lack of strategic transport plan for allocation; ● Loss of green amenity space for local people; ● Destruction of historical and rural area of Worts' Causeway; ● Hold GB2 Land south of Worts' Causeway in reserve and develop a larger GB1 Land north of Worts' Causeway site first up to Cherry Hinton Road; ● Density should be increased on other sites, rather than releasing GB1 Land north of Worts' Causeway and GB2 Land south of Worts' Causeway. ● Reduce developable area of GB1 Land north of Worts' Causeway to 4.3 hectares, provide lower density family
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	housing on the site and provide a buffer to the wildlife site.
Support	<ul style="list-style-type: none"> • Support on the basis of provision of housing.

Minor Modifications suggested following Proposed Submission consultation and implications for Sustainability Appraisal

9. As a result of a representation (Representation Number 28109) made during the Proposed Submission consultation, minor modifications have been suggested to ensure that Policy 26: Site Specific Development Opportunities, criterion (p), which suggests that contributions should be made 'towards improved community facilities and services in this part of the city' and Appendix B Sites GB1 and GB2 are consistent. These changes are in the Addendum to the Cambridge Local Plan 2014: Proposed Submission document marked as PM/B/002 and reads:

~~“Consider on-site community and service provision, jointly with GB1/GB2~~

- contributions should be made towards improved community facilities and services in this part of the city.”

10. Following consideration of the impact of these changes on the Sustainability Appraisal Framework, it has been concluded that these changes do not materially alter the findings of the Sustainability Appraisal.

Site GB2: Land south of Wort’s Causeway

Key issues raised during Issues and Options 2 (2013) consultation

11. The key issues from Issues and Options 2: Part 1 consultation relating to this site can be found in Appendix 5 of the Statement of Consultation.

Key Issues raised during Proposed Submission consultation

Site GB2: Land south of Worts’ Causeway	
Total Representations: 93 (including a petition signed by 2,025 people)	
Object: 90 (including a petition signed by 2,025 people)	Support: 3
Objections	<ul style="list-style-type: none"> • Petition signed by 2,025 people and other respondents opposing the further destruction of the Cambridge Green Belt on the basis of: <ul style="list-style-type: none"> ○ lack of exceptional circumstances to justify release of Green Belt land; ○ urban sprawl impacting on the historic and compact character of the city, its surrounding villages and countryside and impact on traffic congestion; ○ plans being based on out-of-date growth forecasts and first

	<p>consideration should be given to greater re-use of existing brownfield sites not in the Green Belt.</p> <ul style="list-style-type: none"> ● Commercial Estates Group objected to the site allocation on the basis of: <ul style="list-style-type: none"> ○ Insufficient evidence to demonstrate the deliverability and density of a number of allocated sites; ○ Insufficient release of land to deliver housing and employment development to meet objectively assessed needs; ○ Plans rely on infrastructure of high cost and uncertain delivery; ○ Plans do not promote sustainable transport; ○ Spatial distribution of development undermines the economic competitiveness of Cambridge; ○ Need for a joint plan for Cambridge and South Cambridgeshire to deliver growth; ○ Incorrect application of national Green Belt policy and flawed methodology for analysis of landscape value; ○ Flawed sustainability appraisal of the plans; ○ Need for greater land release from the Green Belt in both Cambridge and South Cambridgeshire to deliver between 3,300 and 4,400 homes and 10 hectares of employment land within the plan period. ● Teversham Parish Council objected to the site allocation on the basis of: <ul style="list-style-type: none"> ○ These proposals are contrary to the five purposes served by the Green Belt as identified in the NPPF because they would provide only 3% of the projected housing need, the 'very special circumstances' required to justify harm to land of high Green Belt value do not exist. ○ Development of GB sites (1, 2, 3, 4 and 5) would have a major detrimental impact on the nearby Nature reserves and would constitute urban sprawl which would damage the setting of the city. <ul style="list-style-type: none"> ● Retain existing agricultural use; ● Loss of Green Belt land in food production; ● Impact on flood risk; ● Impact on biodiversity, including red list species and strategically important wildlife habitats; ● Impact on footpaths, setting and compact nature of the city; ● Impact on views and landscape character of area, particularly given the proximity of site to Gog Magog Down, the Beechwoods and Wandlebury; ● Set out provision for strategic green infrastructure and ecological enhancement within the allocation; ● Establish a green corridor linking the head of Hobson's Conduit through to Gog Magog Down, the Beechwoods and
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	<p>Wandlebury;</p> <ul style="list-style-type: none"> • Impact on community infrastructure, such as education and primary healthcare; • Impact on congestion on local roads, which are already heavily used; • Impact on bus services, including Park and Ride bus; • Distance to services is unsustainable and would encourage car use; • Gas infrastructure below ground on site will impact on developability; • Lack of infrastructure plan for the site; • Lack of strategic transport plan for allocation; • Loss of green amenity space for local people; • Destruction of historical and rural area of Worts' Causeway; • Hold GB2 Land south of Worts' Causeway in reserve and develop a larger GB1 Land north of Worts' Causeway first up to Cherry Hinton Road; • Density should be increased on other sites, rather than releasing GB1 Land north of Worts' Causeway and GB2 Land south of Worts' Causeway.
Support	<ul style="list-style-type: none"> • Landowner supports the allocation of the site for development, but seeks clarity on provision of community facilities and services; • Support on the basis of provision of housing.

Minor Modifications suggested following Proposed Submission consultation and implications for Sustainability Appraisal

12. As a result of a representation (Representation Number 28109) made during the Proposed Submission consultation, minor modifications have been suggested to ensure that Policy 26: Site Specific Development Opportunities, criterion (p), which suggests that contributions should be made 'towards improved community facilities and services in this part of the city' and Appendix B Sites GB1 and GB2 are consistent. These changes are in the Addendum to the Cambridge Local Plan 2014: Proposed Submission document marked as PM/B/002 and reads:

~~“Consider on-site community and service provision, jointly with GB1/GB2~~

o contributions should be made towards improved community facilities and services in this part of the city.”

13. Following consideration of the impact of these changes on the Sustainability Appraisal Framework, it has been concluded that these changes do not materially alter the findings of the Sustainability Appraisal.

Site R1: 295 Histon Road

Key issues raised during Issues and Options 2 (2013) consultation

Site Number: R1		
Location: 295 Histon Road		
Total representations: 16		
Object: 7	Support: 4	Comment: 5
Key Issues ARISING FROM CONSULTATION		
Objections	<ul style="list-style-type: none"> • No further housing adjacent to NIAB • Loss of open land • Loss of active sporting facilities • Retain site for use by local community and make good existing shortfall • Loss of small business/mixed use site • Adverse impact on amenity in already congested area • Adverse impact on housing in Tavistock Road • Adverse impact on biodiversity • Surface water flooding across the site • Adverse impact on traffic on Histon Road • Inadequate access to site 	
Support	<ul style="list-style-type: none"> • Fully support • Good site close to amenities • Ideal location for hospice 	
Comments	<ul style="list-style-type: none"> • Squash courts should be retained on-site or relocated • Site should be considered for mixed use • Potentially over scale tall buildings • For family housing if development goes ahead • Development in keeping with housing in the area • Review public transport along Histon Road • Possible cycle connection with Darwin Green • Access should be achievable onto Histon Road • Consider along with site R2 	
ANALYSIS OF KEY ISSUES AND OFFICER RESPONSE		
<p>Representations: total 16; object 7; support 4; comment 5. Key issues are:</p> <ol style="list-style-type: none"> i. Loss of existing sports facilities <ol style="list-style-type: none"> a. Re-provision will be sought in line with policy on the protection of facilities, subject to reviewing need ii. Adverse impacts on amenity of the area <ol style="list-style-type: none"> a. This can be addressed through planning and design iii. Development in keeping with the character of the area <ol style="list-style-type: none"> a. This can be addressed through planning and design iv. Risk of surface water flooding <ol style="list-style-type: none"> a. This can be addressed through mitigation and remediation; there will 		

<p style="text-align: center;">be policies in the Plan about flooding and integrated surface water management</p> <p>v. Ensuring satisfactory access</p> <p style="padding-left: 20px;">a. The County Council raises no highway objections and says access should be achievable onto Histon Road</p> <p>The consultation has raised no issues not identified in the Issues and Options 2 Part 2 report.</p>
<p>Green – No significant planning objections to the allocation (The site to be allocated as defined in Issues and Options 2)</p>

Key Issues raised during Proposed Submission consultation

Site R1: 295 Histon Road	
Total Representations: 8	
Object: 7	Support: 1
Objections	<ul style="list-style-type: none"> Sport England object to allocation for residential development as it would result in the loss of an existing sports facility, the squash club, with no replacement provided or evidence that the facility is surplus to requirements; Squash courts should be replaced on site or at R2 Willowcroft; Area is already subject to excessive traffic levels; Site should not be designated for residential development; Site is not capable of accommodating the number of dwellings suggested; Allocation reduces small and medium scale opportunities for employment development; Community facilities should be provided to remedy the existing shortfall of facilities in Castle Ward.
Support	<ul style="list-style-type: none"> Support and would welcome provision of open space within site.

Minor Modifications suggested following Proposed Submission consultation and implications for Sustainability Appraisal

14. As a result of a number of representations made during the Proposed Submission consultation, a minor modification has been suggested in order to avoid the loss of sports facilities. This change is in the Addendum to the Cambridge Local Plan 2014: Proposed Submission document marked as PM/B/003 and reads:

- o Surface water flooding requires mitigation
- o Access onto Histon Road, subject to detailed testing
- o Maintain link to NIAB
- o Development dependent on re-provision/relocation of the squash courts or evidence to demonstrate lack of need now and in future.

Planning status should include reference to Site 5.17 in Cambridge Local Plan 2006.

15. Following consideration of the impact of this change on the Sustainability Appraisal Framework, it has been concluded that this change does not materially alter the findings of the Sustainability Appraisal.

Site R2: Willowcroft, 137 – 143 Histon Road

Key issues raised during Issues and Options 2 (2013) consultation

Site Number: R2		
Location: Willowcroft, Histon Road		
Total representations: 10		
Object: 2	Support: 5	Comment: 3
KEY ISSUES ARISING FROM CONSULTATION		
Objections	<ul style="list-style-type: none"> • Uncertainty in site being brought forward in plan period 	
Support	<ul style="list-style-type: none"> • Fully support • Area requires improvement 	
Comments	<ul style="list-style-type: none"> • Needs comprehensive development • For family housing • Suitable for student accommodation • Possibly include commercial use • Provide sports and community facilities • Potentially over scale tall buildings • Needs adequate open space and parking • Consider public transport and cycle accessibility • Vehicular access to Histon Road should be achievable 	
ANALYSIS OF KEY ISSUES AND OFFICER RESPONSE		
<p>Representations: total 10; object 2; support 5; comment 3. Key issues are:</p> <ol style="list-style-type: none"> i. Uncertainty about availability <ol style="list-style-type: none"> a. Key landowner supports development potentially before 2031 ii. The preferred mix of uses <ol style="list-style-type: none"> a. Residential is the most appropriate use for this site; the mix of types and sizes will be determine by reference to the Plan and the Affordable Housing SPD iii. Ensuring satisfactory access <ol style="list-style-type: none"> a. The County Council raises no highway objections and says access should be achievable onto Histon Road <p>The consultation has raised no issues not identified in the Issues and Options 2 Part 2 report.</p>		
<p>Green – No significant planning objections to the allocation (The site to be allocated as defined in Issues and Options 2)</p>		

Key Issues raised during Proposed Submission consultation

Site R2: Willowcroft, 137 – 143 Histon Road	
Total Representations: 6	
Object: 3	Support: 3
Objections	<ul style="list-style-type: none"> • Landowner supports the allocation as it is envisaged that the existing business could downsize to a smaller site and the proposed allocation could be released for development before 2031; • Site should not be designated for residential development; • Site is not capable of accommodating the number of dwellings suggested; • Allocation reduces small and medium scale opportunities for employment development; • Area is already subject to excessive traffic levels; • Community facilities should be provided to remedy the existing shortfall of facilities in Castle Ward.
Support	<ul style="list-style-type: none"> • General support; • Site needs comprehensive approach, including provision of new sports and other facilities for local community.

Minor Modifications suggested following Proposed Submission consultation and implications for Sustainability Appraisal

16. No changes to Site R2: Willowcroft are suggested in the Addendum to the Cambridge Local Plan 2014: Proposed Submission document. There are therefore no impacts on the findings of the Sustainability Appraisal.

Site R3: City Football Ground, Milton Road

Key issues raised during Issues and Options 2 (2013) consultation

Site Number: R3		
Location: City Football Ground		
Total representations: 16		
Object: 8	Support: 1	Comment: 7
KEY ISSUES ARISING FROM CONSULTATION		
Objections	<ul style="list-style-type: none"> • Loss of sports facilities • Could be an ice rink site • Object unless equivalent facilities provided elsewhere • Possible site for community stadium • Poor connectivity with surrounding development 	
Support	<ul style="list-style-type: none"> • Alternative pitch can be provided for CCFC • Site will be available and suggested problems can be mitigated 	

Comments	<ul style="list-style-type: none"> • Alternative site must be provided • Mitigation for loss of ground must not be at expense of Green Belt • Development should fund improvements to Mitcham's Corner • Foot and cycle access not only from Milton Road; car access only from Milton Road • Consider public transport and cycle accessibility • Access and impact on Mitcham's Corner to be assessed • Car access difficult
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ANALYSIS OF KEY ISSUES AND OFFICER RESPONSE

Representations: total 16; object 8; support 1; comment 7. Objections significantly outweigh support.

Key issues are:

- i. Loss of existing sports facilities
 - a. Improvements in the area are being addressed; CCFC working on alternative provision in the Cambridge catchment
- ii. Ensuring satisfactory access
 - a. The County Council raises no highway objections and says capacity analysis of site access junctions will be required

The consultation has raised no issues not identified in the Issues and Options 2 Part 2 report. Note site has planning consent for housing.

Green – No significant planning objections to the allocation (The site to be allocated as defined in Issues and Options 2. The potential residential capacity has been reduced from 147 to 138 to reflect a pending planning permission – 12/1211/FUL)

Key Issues raised during Proposed Submission consultation

Site R3: City Football Ground, Milton Road	
Total Representations: 2	
Object: 1	Support: 1
Objections	<ul style="list-style-type: none"> • Site should be included in Mitcham's Corner Opportunity Area (Policy 21).
Support	<ul style="list-style-type: none"> • General support.

Minor Modifications suggested following Proposed Submission consultation and implications for Sustainability Appraisal

17. No changes to Site R3: City Football Ground are suggested in the Addendum to the Cambridge Local Plan 2014: Proposed Submission document. There are therefore no impacts on the findings of the Sustainability Appraisal.

Site R4: Henry Giles House, 73 – 79 Chesterton Road

Key issues raised during Issues and Options 2 (2013) consultation

Site Number: R4		
Location: Henry Giles House, Chesterton Road		
Total representations: 17		
Object: 2	Support: 8	Comment: 7
KEY ISSUES ARISING FROM CONSULTATION		
Objections	<ul style="list-style-type: none"> • Should be for business development close to city centre • Will add to congestion in surrounding streets 	
Support	<ul style="list-style-type: none"> • Fully support site • Ideal site for hospice • Existing building is ugly • Will lessen conflicts on zebra crossing 	
Comments	<ul style="list-style-type: none"> • Possibly for student accommodation • Design sensitive to the area • Development should seek to reduce flood risk • Traffic issues need to be solved • Review bus connections • Access off Carlyle Road, not Chesterton Road • Must include car parking – already pressure on parking in the area 	
ANALYSIS OF KEY ISSUES AND OFFICER RESPONSE		
<p>Representations: total 17; object 2; support 8; comment 7. Site enjoys a good measure of support.</p> <p>Key issues are:</p> <ol style="list-style-type: none"> i. Benefits of retaining business use <ol style="list-style-type: none"> a. The site is an existing residential allocation as such the loss of business uses has been accepted previously. The site is capable of making a significant contribution to meeting residential need and, while occupied currently, the fact that it is set in a residential location means it may not be attractive to business uses once it is vacated. ii. Development in keeping with the character of the area <ol style="list-style-type: none"> a. This can be addressed through planning and design iii. Reducing flood risk <ol style="list-style-type: none"> a. This can be addressed through mitigation and remediation; there will be policies in the Plan about flooding and integrated surface water management iv. Ensuring satisfactory access and car parking <ol style="list-style-type: none"> a. The County Council raises no highway objections and says vehicular access should be off Carlyle Road, not Chesterton Road say something about car parking standards <p>The consultation has raised no issues not identified in the Issues and Options 2 Part</p>		

2 report.

Key Issues raised during Proposed Submission consultation

Site R4: Henry Giles House, 73 – 79 Chesterton Road	
Total Representations: 9	
Object: 5	Support: 4
Objections	<ul style="list-style-type: none"> • Allocation removes important services from the site; • Site should not be designated for residential development; • Site is not capable of accommodating the number of dwellings suggested; • Allocation reduces opportunities for employment development; • Area is already subject to excessive traffic and parking levels; • Access from Chesterton Road only; • Site must accommodate all its own parking; • Further pressure on local services.
Support	<ul style="list-style-type: none"> • General support; • Welcome the possibility of replacement of the existing building with high quality, innovative architecture.

Minor Modifications suggested following Proposed Submission consultation and implications for Sustainability Appraisal

18. No changes to Site R4: Henry Giles House are suggested in the Addendum to the Cambridge Local Plan 2014: Proposed Submission document. There are therefore no impacts on the findings of the Sustainability Appraisal.

Site R5: Camfields Resource Centre and Oil Depot, 137 – 139 Ditton Walk

Key issues raised during Issues and Options 2 (2013) consultation

Site Number: R5		
Location: Camfields Resource Centre and Oil Depot		
Total representations: 10		
Object: 5	Support: 3	Comment: 2
KEY ISSUES ARISING FROM CONSULTATION		
Objections	<ul style="list-style-type: none"> • Develop for employment purposes • Will exacerbate potential flood problems • Insufficient current parking in the area 	
Support	<ul style="list-style-type: none"> • Support the proposal 	
Comments	<ul style="list-style-type: none"> • Site should not be considered until CUFC has relocated • Development needs to protect the meadow • Development should seek to reduce flood risk • Needs traffic assessment • Explore public transport and cycle links 	

	<ul style="list-style-type: none"> • Access to Ditton Walk acceptable
ANALYSIS OF KEY ISSUES AND OFFICER RESPONSE	
<p>Representations: total 10; object 5; support 3; comment 2</p> <p>Key issues are:</p> <ol style="list-style-type: none"> i. Benefits of retaining business use <ol style="list-style-type: none"> a. The assessment concludes the loss of a small amount industrial land to housing is acceptable. Any residential scheme would have to be designed to work with adjacent industrial uses, as the residential use across the road already does. ii. Impacts on amenity of the meadow <ol style="list-style-type: none"> a. This can be addressed through planning and design iii. Need to reduce flood risk <ol style="list-style-type: none"> a. This can be addressed through mitigation and remediation; there will be policies in the Plan about flooding and integrated surface water management iv. Ensuring satisfactory access <ol style="list-style-type: none"> a. The County Council raises no highway objections and says vehicular access onto Ditton Walk should be acceptable <p>The consultation has raised no issues not identified in the Issues and Options 2 Part 2 report.</p>	
<p>Green – No significant planning objections to the allocation (The site to be allocated as defined in Issues and Options 2)</p>	

Key Issues raised during Proposed Submission consultation

Site R5: Camfields Resource Centre and Oil Depot, 137 – 139 Ditton Walk	
Total Representations: 2	
Object: 0	Support: 2
Objections	Not applicable
Support	<ul style="list-style-type: none"> • General support, particularly if the site provides its own car parking within the site.

Minor Modifications suggested following Proposed Submission consultation and implications for Sustainability Appraisal

19. No changes to Site R5: Camfields Resource Centre and Oil Depot are suggested in the Addendum to the Cambridge Local Plan 2014: Proposed Submission document. There are therefore no impacts on the findings of the Sustainability Appraisal.

Site R7: The Paddocks, 347 Cherry Hinton Road

Key issues raised during Issues and Options 2 (2013) consultation

Site Number: R7
Location: The Paddocks, Cherry Hinton Road
Total representations: 12

Object: 6	Support: 3	Comment: 3
KEY ISSUES ARISING FROM CONSULTATION		
Objections	<ul style="list-style-type: none"> • Retain in employment use • Problems of noise, pollution and disturbance from housing estate • Impact on traffic on Cherry Hinton Road 	
Support	<ul style="list-style-type: none"> • Fully support • Accept need for housing • Site is a mess 	
Comments	<ul style="list-style-type: none"> • Concern at loss of employment site • Not flats • Maximum of three storeys • Protect tree • Develop in character with surrounding area • Explore public transport and cycle links • Access to site would need to be reviewed carefully 	
ANALYSIS OF KEY ISSUES AND OFFICER RESPONSE		
<p>Representations: total 12; object 6; support 3; comment 3. Key issues are:</p> <ol style="list-style-type: none"> i. Retention of employment site <ol style="list-style-type: none"> a. The site is an existing residential allocation and as such the loss of business uses has previously been accepted. The site is capable of making a significant contribution to meeting residential needs. ii. Adverse impacts on amenity of the area <ol style="list-style-type: none"> a. This can be addressed through planning iii. Development in keeping with the character of the area <ol style="list-style-type: none"> a. This can be addressed through planning and design iv. Ensuring satisfactory access <ol style="list-style-type: none"> a. The County Council raises no highway objections and says access would need to be reviewed carefully given the constrained location <p>The consultation has raised issues of amenity and design not in the Issues and Options 2 Part 2 report, but these can be dealt with.</p> <p style="background-color: #92d050;">Green – No significant planning objections to the allocation (The site to be allocated as defined in Issues and Options 2)</p>		

Key Issues raised during Proposed Submission consultation

Site R7: The Paddocks, 347 Cherry Hinton Road	
Total Representations: 6	
Object: 3	Support: 3
Objections	<ul style="list-style-type: none"> • Maximum height of development should be limited to three storeys; • Development should not be of a high density; • Negative impact on local biodiversity; • Allocation reduces small and medium scale opportunities for employment development.

Support	<ul style="list-style-type: none"> • Landowner support for allocation; • General support; • Support subject to design of buildings being consistent in scale with surrounding streets and retention of existing trees and vegetation.
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Minor Modifications suggested following Proposed Submission consultation and implications for Sustainability Appraisal

20. No changes to Site R7: The Paddocks are suggested in the Addendum to the Cambridge Local Plan 2014: Proposed Submission document. There are therefore no impacts on the findings of the Sustainability Appraisal.

Site R8: 149 Cherry Hinton Road and Telephone Exchange, Coleridge Road

Key issues raised during Issues and Options 2 (2013) consultation

Site Number: R8		
Location: 149 Cherry Hinton Road		
Total representations: 9		
Object: 5	Support: 3	Comment: 1
KEY ISSUES ARISING FROM CONSULTATION		
Objections	<ul style="list-style-type: none"> • Loss of mixed use • If there is access along track from Derby Road 	
Support	<ul style="list-style-type: none"> • Support development • Site suitable for housing • Housing compatible with surrounding area 	
Comments	<ul style="list-style-type: none"> • Allow for mixed use • Link development to Telephone Exchange site in Coleridge Road • Concern at loss of laundry • Protect trees • Ensure proper management of traffic • Ensure adequate parking on site • Access to Cherry Hinton Road should be achievable 	
ANALYSIS OF KEY ISSUES AND OFFICER RESPONSE		
<p>Representations: total 9; object 5; support 3; comment 1. Key issues are:</p> <ol style="list-style-type: none"> i. Loss of existing/mixed use <ol style="list-style-type: none"> a. The assessment concludes the loss of a small amount industrial land to housing is acceptable; the laundry provides a citywide service and does not depend on meeting an immediate local catchment ii. Development in keeping with the character of the area and retention of trees <ol style="list-style-type: none"> a. This can be addressed through planning and design are trees protected 		

iii. Ensuring satisfactory access and parking
 a. The County Council raises no highway objections and says access to Cherry Hinton Road should be achievable
 The consultation has raised no issues not identified in the Issues and Options 2 Part 2 report.

Green – No significant planning objections to the allocation (Since consultation this site has been extended to include the telephone exchange on Coleridge Road (SHLAA site CC081). The telephone exchange site is too small to allocate on its own and as it shares a boundary with 149 Cherry Hinton Road it make sense to allocate them together. The site area has increased to 0.76ha and its potential residential capacity has increased from 17 to 33 dwellings.)

Key Issues raised during Proposed Submission consultation

Site R8: 149 Cherry Hinton Road and Telephone Exchange, Coleridge Road	
Total Representations: 4	
Object: 4	Support: 0
Objections	<ul style="list-style-type: none"> Landowner has confirmed that the site could be made available for mixed-use redevelopment during the plan period to 2031 dependent on the successful relocation of all or part of the existing business; The site should be redefined as a mixed-use site and potential development capacity of the site may need to be amended to reflect a mix of residential and commercial uses; The site is suitable for retail use, given its location near local centres (Aldi); Allocation reduces small and medium scale opportunities for employment development; Allocation means the loss of a local service to the community.
Support	Not applicable

Minor Modifications suggested following Proposed Submission consultation and implications for Sustainability Appraisal

21. No changes to Site R8: 149 Cherry Hinton Road and Telephone Exchange are suggested in the Addendum to the Cambridge Local Plan 2014: Proposed Submission document. There are therefore no impacts on the findings of the Sustainability Appraisal.

Site R9: Travis Perkins, Devonshire Road

Key issues raised during Issues and Options 2 (2013) consultation

Site Number: R9		
Location: Travis Perkins, Devonshire Road		
Total representations: 25		
Object: 7	Support: 10	Comment: 8
KEY ISSUES ARISING FROM CONSULTATION		
Objections	<ul style="list-style-type: none"> • Loss of local employment • Loss of 'hardware store' • Close to Station and should be available for mixed use or offices • More open space needed in the area • Housing designed for commuters • Adverse impact on residents in Devonshire Road • Insufficient school and GP capacity • Adverse impact on traffic 	
Support	<ul style="list-style-type: none"> • Support this site • Is a residential area • Supports and improves character of the area • Improve traffic on Mill Road 	
Comments	<ul style="list-style-type: none"> • Suitable for Council housing • Provide affordable housing • Site for housing co-op • Not dedicated student accommodation • Need high quality design • Houses of adequate size • No open space nearby, provide some on site • Promote sustainable transport • Explore public transport and cycle links • Access to site would need to be reviewed carefully • Need to manage traffic access • Provide site for Chisholm trail • Make proper cycle provision to Station 	
ANALYSIS OF KEY ISSUES AND OFFICER RESPONSE		
<p>Representations: total 25; object 7; support 10; comment 8. Site enjoys a good measure of support.</p> <p>Key issues are:</p> <ol style="list-style-type: none"> i. Loss of employment land close to station <ol style="list-style-type: none"> a. The site is an existing residential allocation and as such the loss of business uses has previously been accepted. The site is capable of making a significant contribution to meeting residential needs. ii. Type of housing to be provided <ol style="list-style-type: none"> a. Aim is to provide a mix of housing types and sizes in line with the requirements of the Plan and the Affordable housing SPD 		

<ul style="list-style-type: none"> iii. Need for open space in the area <ul style="list-style-type: none"> a. Agreed; development should help to meet the need and is identified in the Proposals Schedule iv. Capacity of community infrastructure <ul style="list-style-type: none"> a. School capacity is limited, but primary constraints can be mitigated v. Dealing with traffic and ensuring satisfactory access <ul style="list-style-type: none"> a. The County Council raises no highway objections, but says access to this site would need to be considered carefully given constrained location <p>The consultation has raised the issue of open space provision that was not identified as a concern in the Issues and Options 2 Part 2 report.</p> <p style="background-color: yellow;">Amber – Significant planning concerns expressed, but can be addressed (The site to be allocated as defined in Issues and Options 2)</p>

Key Issues raised during Proposed Submission consultation

Site R9: Travis Perkins, Devonshire Road	
Total Representations: 10	
Object: 7	Support: 3
Objections	<ul style="list-style-type: none"> • No further residential development in the area; • Site allocation should be for mixed use; • Need for comprehensive masterplan for major development sites; • Development will have a negative impact on existing public open space in Petersfield and more open space must be provided; • Density of allocation is too high; • Number of affordable homes should be increased; • Junction of Devonshire Road and Mill Road is already very dangerous and will be further affected by this development.
Support	<ul style="list-style-type: none"> • General support; • Support provision of the Chisholm Trail from this site.

Minor Modifications suggested following Proposed Submission consultation and implications for Sustainability Appraisal

22. No changes to Site R9: Travis Perkins are suggested in the Addendum to the Cambridge Local Plan 2014: Proposed Submission document. There are therefore no impacts on the findings of the Sustainability Appraisal.

Site R10: Mill Road Depot and adjoining properties, Mill Road

Key issues raised during Issues and Options 2 (2013) consultation

Site Number: R10		
Location: Mill Road Depot and adjoining properties		
Total representations: 184		
Object: 150	Support: 15	Comment: 19
KEY ISSUES ARISING FROM CONSULTATION		
Objections	<ul style="list-style-type: none"> • Relocation of Depot will make Council services more remote in less sustainable location for users and employees • Sufficient alternative sites identified in SHLAA • Loss of employment land • Loss of employment - affecting daytime trade for local businesses • Loss of local businesses • Retain for commercial employment use • Only allowed if existing uses no longer required • Site for Anglia Ruskin University, teaching, research etc • No nearby green space • Best serve the local community by being turned into a park • Change of character of area • Difficult to integrate new development with existing community • Already an overcrowded area • Overlooking of residential properties • Adverse impact on quiet streets • Adverse impact of construction on foundations of existing terraced houses • Adverse impact on air quality • Adverse impact on Conservation Area • Adverse impact on Listed Building • Over development proposed (167 dwellings) • Save the Library & Hindu Temple • Loss of cultural facility • Inadequate local infrastructure, e.g. schools • No access via Hooper Street • Unsuitable site for biomass heating, so how would it meet energy targets? • Impact on waste disposal and sewerage • Contamination will require remediation and may make site unviable • Multiple ownership will limit viability 	

	<ul style="list-style-type: none"> • Adverse impact of increased traffic on area • Adverse impact of increased traffic on main road network • Access from Mill Road very bad • Loss of existing access to properties • Will exacerbate existing on-street parking problems • Loss of garages
Support	<ul style="list-style-type: none"> • Good idea • Fully support development • Agree in principle • Depends on finding relocation site for the Depot • Redevelopment of brownfield site • Welcome sustainable and reasonable development • Development creates opportunities to tackle existing problems in the area
Comments	<ul style="list-style-type: none"> • Provide a mixed use development • Provide affordable housing • A fully mutual housing co-operative on the site • Provide family housing • Unsuitable for student housing • Low height and low density housing • Ensure houses are well designed externally and internally • Provide open space • Safeguard the CWRC for the future • Carry out archaeological investigation • Street infrastructure, e.g. pavements, drainage etc needs to be addressed • Provide rear access to houses in Kingston Street • Foul drainage network will need upgrading • Need to review and assess local and strategic access and highway implications carefully • Explore potential to provide links and permeability to wider area • Possible access via Hooper Street • Access from Mill Road • Access from Kingston Street • Improve Mill Road – Kingston Street – Devonshire Road – Depot junction • Provide room for the Chisholm Cycle trail • Provide pedestrian/cycle bridge to Romsey • Adequate car parking must be provided • Restrict car ownership • Security of gardens and houses needs to be addressed

ANALYSIS OF KEY ISSUES AND OFFICER RESPONSE

Representations: total 184; object 150; support 15; comment 19. Objections constitute the overwhelming response. Much of this reaction flows from a fear of the traffic implications, especially traffic being taken through Hooper Street and into the narrow streets of St Matthews (stimulated by the Issues and Options Report saying access should not be from Mill Road) and the loss of garages in Hooper Street, in an area where parking is at a premium. These concerns may have generated additional points of objection to reinforce the case against the allocation. The 15 representations of support and 19 of comment are more than for any other site

Key issues are:

- i. Potentially remote, less sustainable, location of Council Depot
 - a. It is not generally used by the public
- ii. Loss of employment land and uses
 - a. The Depot functions rely on a high number of movements by large vehicles. The current site is not ideal for this. The employment would be replaced elsewhere.
- iii. Lack of green space nearby
 - a. The site has potential to help redress the local deficiency
- iv. Adverse impact on character and amenity of the area
 - a. This can be addressed through planning and design
- v. Adverse impact on heritage assets
 - a. This can be addressed through planning and design; and the Library is a Listed Building
- vi. Adverse impact on community and cultural facilities
 - a. This can be addressed through planning to incorporate provision
- vii. Capacity of community infrastructure
 - a. School capacity is limited, primary constraints can be mitigated, but overall a serious concern
- viii. Concerns over viability
 - a. Study shows site has good viability
- ix. Dealing with traffic and ensuring satisfactory access
 - a. The County Council raises no highway objections, but says this site would be in need of careful review in the of highway access

The consultation has not raised substantive issues that were not identified in the Issues and Options 2 Part 2 report.

Amber – Significant planning concerns expressed, but can be addressed (The site to be allocated as defined in Issues and Options 2)

Key Issues raised during Proposed Submission consultation

Site R10: Mill Road Depot and adjoining properties, Mill Road	
Total Representations: 194 (including one survey of 10 residents and one petition signed by 130 people)	
Object: 188 (including one survey of 10 residents and one petition signed by 130 people)	Support: 6
Objections	<ul style="list-style-type: none"> • Petition signed by 130 people raised concerns about provision of open space and community facilities locally, the need to use part of the site as open space and community facilities with a commensurate reduction in housing numbers, and the need for building heights to be no higher than the existing skyline; • Survey of 10 residents in Hooper Street raised concerns about density, building heights, loss of garages, increased congestion, access needing to be from Mill Road • Many objections to Mill Road Depot being allocated, objected on the basis of: <ul style="list-style-type: none"> ○ Density of proposed development is too high – reference was made . representations to densities of between 19dph and 35dph being considered acceptable; ○ Access to the site should be from Mill Road only; ○ Access to the site from other streets, particularly from Hooper Street, Ainsworth Street, York Street, Milford Street or Sturton Street; ○ Access to surrounding streets needs to be clarified as a part of any development; ○ Impact on parking in the area, where there is already a shortage; ○ Poor highway conditions locally will be exacerbated with safety impacts on pedestrians and cyclists; ○ Inappropriately high density of dwellings proposed; ○ Overloading of local community infrastructure, particularly education and primary healthcare; ○ Impact on local drainage infrastructure; ○ Light and noise pollution impacts will increase; ○ Site should be developed by residents for residents – creation of a cooperative; • Conflict of interests as the council is both the landowner and developer; • Pigeon Land state that there is lack of evidence that the uses on site can be accommodated elsewhere and that this site is deliverable; • Consultation on the allocation was poor; • Need for trees and space next to Mill Road bridge to be maintained;

	<ul style="list-style-type: none"> • Need for land to be allocated within the site for the Chisholm Trail; • Development should include a mix of uses, including commercial development, market provision, small businesses; • Development higher than two storeys would overlook neighbouring properties; • Library building must be retained; • Impact of moving council services out of the city centre; • Add rear access/parking at the back of Kingston Street to the development site; • Impact on conservation area; • Need for guaranteed open space and community facilities, given Petersfield’s lack of open space; • Need for sufficient parking on site for development; • Make the whole site into a park, including pitch provision and a skate park for young people; • Need for more accessible green space on site, including a specified proportion of public open space, play space and spaces which promote biodiversity. e.g. community orchard and nature reserve; • Need for a comprehensive masterplan for the site; • Need for affordable family housing, not flats; • Site should be used for provision of an ice rink; • Make the development car-free and restrict occupiers’ ability to park on neighbouring streets and have developers subsidise local bus tickets; • Garages are on long leases and are not available for development; • Loss of garages would put further pressure on car parking – alternative provision must be made or they must be retained; • Concern about a district energy centre being • Some respondents supported the allocation in principle, but were concerned about vehicular access from Hooper Street. Access should be from Mill Road only.
Support	<ul style="list-style-type: none"> • The landowner has supported the proposed allocation, dependent on the successful relocation of the uses currently on the site; • Supported on the basis of need for additional housing.

Minor Modifications suggested following Proposed Submission consultation and implications for Sustainability Appraisal

23. As a result of numerous representations made during the Proposed Submission consultation, minor modifications have been suggested to ensure consistency of approach with other sites and to ensure appropriate development on site.

These changes are in the Addendum to the Cambridge Local Plan 2014: Proposed Submission document marked as PM/B/004 and reads:

- ~~Abuts~~ Within Mill Road Opportunity Area
- Contamination requires remediation
- Retain listed library building
- Open space requirements to reflect location in an area of open space deficiency
- Potential location for district energy centre
- ~~Site will need careful review of highway access~~ Vehicular access to be from Mill Road only, subject to detailed testing
- Provide room for the Chisholm Trail
- Range of housing typologies to be provided across the site

The site promoters will be expected to prepare a planning and development brief for the site demonstrating how development will successfully integrate with the existing residential area as well as addressing the constraints and opportunities of the site. Scale, massing and density considerations in the design and disposition of new and existing housing will be expected to have regard to the character of the existing area.

24. Following consideration of the impact of these changes on the Sustainability Appraisal Framework, it has been concluded that these changes do not materially alter the findings of the Sustainability Appraisal.

Site R11: Horizon Resource Centre, 285 Coldham’s Lane

Key issues raised during Issues and Options 2 (2013) consultation

Site Number: R11		
Total representations: 11		
Location: Horizons Resource Centre, Coldham’s Lane		
Object: 3	Support: 2	Conditional: 6
Key Issues ARISING FROM CONSULTATION		
Objections	<ul style="list-style-type: none"> • Locations at busy junction not suitable for housing • Redevelop for office/business use • Concerned about impact on adjacent green spaces and links to nearby nature reserves • Use as green space for local community 	
Support	<ul style="list-style-type: none"> • Social/affordable housing for local people • Good for housing • Suitable for student accommodation & mixed use 	
Conditional	<ul style="list-style-type: none"> • Need to improve conditions for cyclists on roads in area • Need to improve junction 	

	<ul style="list-style-type: none"> • Site access needs junction improvements • Review public transport • Improve strategic cycle access • Vehicle access difficult to achieve
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ANALYSIS OF KEY ISSUES AND OFFICER RESPONSE

Representations: total 11; object 3; support 2; comment 6. The consultation has prompted comment rather than strong objection of comment

Key issues are:

- i. The suitability of this busy location for housing
 - a. This is a sustainable location for housing and design will address the challenges of the location
- ii. Impacts on nearby green spaces
 - a. This can be addressed through planning and design
- iii. Ensuring satisfactory access
 - a. The county Council raises no highway objections, but says vehicular access could be difficult to achieve and will need careful consideration

The consultation has raised no issues not identified in the Issues and Options 2 Part 2 report.

Amber – Significant planning concerns expressed, but can be addressed (The site to be allocated as defined in Issues and Options 2)

Key Issues raised during Proposed Submission consultation

Site R11: Horizon Resource Centre, 285 Coldham’s Lane	
Total Representations: 1	
Object: 1	Support: 0
Objections	<ul style="list-style-type: none"> • Site is a valuable resource for people with learning and physical disabilities and should not be lost.
Support	Not applicable

Minor Modifications suggested following Proposed Submission consultation and implications for Sustainability Appraisal

- 25. No changes to Site R11: Horizon Resource Centre are suggested in the Addendum to the Cambridge Local Plan 2014: Proposed Submission document. There are therefore no impacts on the findings of the Sustainability Appraisal.

Site R12: Ridgeons, 75 Cromwell Road

Key issues raised during Issues and Options 2 (2013) consultation

Site Number: R12		
Location: Ridgeon's, 75 Cromwell Road		
Total representations: 32		
Object: 16	Support: 4	Comment: 12
KEY ISSUES ARISING FROM CONSULTATION		
Objections	<ul style="list-style-type: none"> • Loss of substantial commercial site – use for office/business purposes • Viable business which will need alternative relocation site, so stay where it is • Valuable and useful business • Loss of employment opportunities unless Ridgeon's relocate in or very near the City • Alternative locations potentially less sustainable • Cromwell Road cannot accommodate more densely developed flats – develop for family houses with gardens • Provide mixed use • Great site for an ice rink • Overlooking neighbouring properties from high buildings • Would stretch local facilities to the limit • Remoteness from shops and facilities • Problem of traffic congestion on Coldham's Lane, also in Cromwell Road, Sedgewick Street and Romsey generally 	
Support	<ul style="list-style-type: none"> • Fully support development • Support the allocation – company intends to relocate 	
Comments	<ul style="list-style-type: none"> • Very useful builders' merchants • Doubtful until clear where Ridgeon's will go • Social/affordable housing for local people • No more 1 & 2 bedroom flats • Affordable mixed housing • Non segregated housing for the elderly • Suitable for student residential accommodation • Develop co-operative housing • Include flexile community rooms • Provide open space • Consider biodiversity • Need for allotments • Need high standard of design • No more then three storeys 	

	<ul style="list-style-type: none"> • Explore public transport and cycle links • Consider implications of rail track as a barrier • Prioritise cycling and car hire over car ownership • Where is access from – needs to be investigated? • Access from Cromwell Road should be achievable • Provide pedestrian and cycle bridge across railway • Provide room for the Chisholm Cycle Trail
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ANALYSIS OF KEY ISSUES AND OFFICER RESPONSE

Representations: total 32; object 16; support 4; comment 12. The proposal elicited a significant number of objection and comments

Key issues are:

- i. Loss of existing business/use
 - a. The business has approached the Council and informed it that the business intends to relocate to an alternative site. This site is capable of making a significant contribution to meeting residential need.
- ii. The form housing should take
 - a. This can be addressed through planning and design, with reference to the Plan and the Affordable Housing SPD
- iii. The quality of the development and its impact on the area
 - a. This can be addressed through planning and design
- iv. The adequacy of local services and facilities
 - a. There are facilities nearby, but education is an issue
- v. Ensuring satisfactory access
 - a. The County Council raises no highway objections and says access should be achievable from Cromwell Road

The consultation has raised the issues of the retention of the business use that was not identified in the Issues and Options 2 Part 2 report.

Amber – Significant planning concerns expressed, but can be addressed (The site boundary has changed because of a drafting error in the Issues and Options 2 document, the site area stays the same. Following consultation with the Urban Design Team the capacity of the site has been increased from 120 dwellings to 245 dwellings to reflect achievable site densities.)

Key Issues raised during Proposed Submission consultation

Site R12: Ridgeons, 75 Cromwell Road	
Total Representations: 88 (including a petition signed by 527 people)	
Object: 84 (including a petition signed by 527 people)	Support: 4
Objections	<ul style="list-style-type: none"> • Petition signed by 527 people objecting to the allocation on the basis of density; need for family housing for local people; need for accessible green space; need for a safe crossing of the railway and request to change the site to mixed use; • Many objections sought to reduce the number of units proposed for the site – the proposed density is too high and

	<p>does not reflect the density proposed at Issues and Options 2 stage (numerous respondents suggested alternative densities ranging from 30 to 45dph)</p> <ul style="list-style-type: none"> • Many objections stated that development of the R12 Ridgeons site will: <ul style="list-style-type: none"> ○ Overload local infrastructure; ○ Add to local traffic on an already congested transport network; ○ Cause noise pollution problems; ○ Contribute to problems with highway and pedestrian safety, with more vehicles emerging onto Cromwell Road; ○ Give rise to loss of jobs and the loss of an important builders merchant; ○ Exacerbate problems already caused by Winstanley Court and Hampden Gardens; ○ Impact on sewerage and flood risk; ○ Impact on the adjacent conservation area; • Need for specified housing mix incorporating more affordable family homes with gardens, not flatted development; • Need for Environmental Impact Assessment and may be contrary to the Aarhus Convention • Need to provide community and leisure facilities, including medical and education provision; • Need for more accessible green space on site, including public open space and spaces which promote biodiversity; • Need for the development to be of a high design quality which works with the surrounding streetscape and the surrounding ward of Romsey, .e.g. building heights need to respect neighbouring properties; • The site should be part of an opportunity area; • A masterplan should be produced for the site; • Need for a pedestrian and cycle link over the railway line; • Need to include land for the delivery of the Chisholm Trail; • Need for sufficient parking on site for development; • Make the development car-free and restrict occupiers' ability to park on neighbouring streets; • Need to consider the soakaway within the site and adjacent to Winstanley Court; • Lack of provision for the elderly. • Site is too contaminated for residential use; • Site should be mixed use, with small businesses and local independent retail provision; • Cavendish Road should not be opened up to additional pedestrian or vehicular traffic.
Support	<ul style="list-style-type: none"> • Supported by landowner subject to a suitable alternative site being found to relocate existing builders' merchant use to. It

	<p>is expected that the land will be made available within the plan period to 2031;</p> <ul style="list-style-type: none"> • General support.
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Minor Modifications suggested following Proposed Submission consultation and implications for Sustainability Appraisal

26. As a result of numerous representations made during the Proposed Submission consultation, minor modifications have been suggested to ensure appropriate development on site. These changes are in the Addendum to the Cambridge Local Plan 2014: Proposed Submission document marked as PM/B/005 and read:

- “Contamination requires remediation and may limit type of housing
- Open space requirements to reflect location in an area of open space deficiency
- Primary access onto Cromwell Road, subject to detailed testing
- Within the air quality management area
- Range of housing typologies to be provided across the site
- The site promoters will be expected to prepare a planning and development brief for the site demonstrating how development will successfully integrate with the existing residential area as well as addressing the constraints and opportunities of the site. Scale, massing and density considerations in the design and disposition of new and existing housing will be expected to have regard to the character of the existing area.

Under planning status, amend reference to Local Plan 2006 allocation. Should read ‘5.14’ not ‘5.15.’”

27. Following consideration of the impact of these changes on the Sustainability Appraisal Framework, it has been concluded that these changes do not materially alter the findings of the Sustainability Appraisal.

Site R14: BT telephone exchange and car park, Long Road

Key issues raised during Issues and Options 2 (2013) consultation

Site Number: R14		
Location: BT Telephone Exchange and car park, Long Road		
Total representations: 10		
Object: 2	Support: 7	Comment: 1
KEY ISSUES ARISING FROM CONSULTATION		
Objections	<ul style="list-style-type: none"> • Loss of an employment base 	
Support	<ul style="list-style-type: none"> • Good site for houses 	

	<ul style="list-style-type: none"> • Will have good access to local services on Southern Fringe
Comments	<ul style="list-style-type: none"> • Ensure relocation site for BT Exchange so no adverse impact on broadband investment • Why not take the College field as well? • Consider providing for local community needs • Low density larger houses • No more than three storeys • No flats • Need to consider traffic options • Review public transport connections • Traffic on Long Road is an issue • Access to Long Road should be achievable • Optimise cycle access to Guide Bus route

ANALYSIS OF KEY ISSUES AND OFFICER RESPONSE

Representations: total 10; object 2; support 7; comment 1. The proposal elicited a significant support and little objection.

Key issues are:

- i. The form housing should take
 - a. This can be addressed through planning and design with reference to the Plan and the Affordable Housing SPD
- ii. The quality of the development and its impact on the area
 - a. This can be addressed through planning and design
- iii. Ensuring satisfactory access
 - a. The County Council raises no highway objections and says access should be achievable from Long Road

The consultation has raised no issues not identified in the Issues and Options 2 Part 2 report.

Green – No significant planning objections to the allocation (The site to be allocated as defined in Issues and Options 2.)

Key Issues raised during Proposed Submission consultation

Site R14: BT telephone exchange and car park, Long Road	
Total Representations: 2	
Object: 0	Support: 2
Objections	Not applicable
Support	<ul style="list-style-type: none"> • General support

Minor Modifications suggested following Proposed Submission consultation and implications for Sustainability Appraisal

28. No changes to Site R14: BT telephone exchange and car park are suggested in the Addendum to the Cambridge Local Plan 2014: Proposed Submission document. There are therefore no impacts on the findings of the Sustainability Appraisal.

Site R16: Cambridge Professional Development Centre, Foster Road

Key issues raised during Issues and Options 2 (2013) consultation

Site Number: R16		
Location: Cambridge Professional Development Centre, Paget Road (now addressed as Foster Road)		
Total representations: 22		
Object: 14	Support: 3	Comment: 5
KEY ISSUES ARISING FROM CONSULTATION		
Objections	<ul style="list-style-type: none"> • Loss of protected open space/playing fields • Growth in the area means more demand for open space • Loss of opportunity to meet needs of Fawcett School • Adverse impact on adjoining properties • Additional noise pollution • Additional light pollution • Impact of more traffic, e.g. at Anstey Way – Trumpington High Street junction • Traffic danger for children going to school nearby • Poor access 	
Support	<ul style="list-style-type: none"> • Fully support development 	
Comments	<ul style="list-style-type: none"> • Develop the CPDC site & car park, not the open space • Develop for special needs housing or for elderly people • Suitable for student accommodation • Improve open space • Need to consider traffic options • Review public transport connections • Improve cycle access to park and ride site • No vehicular access from Alpha Road • Access should be achievable via Foster Road 	
ANALYSIS OF KEY ISSUES AND OFFICER RESPONSE		
<p>Representations: total 22; object 14; support 3; comment 5. Objections significantly outnumber support and comments.</p> <p>Key issues are:</p> <ol style="list-style-type: none"> i. The loss of open space, which is needed by the community <ol style="list-style-type: none"> a. Revised site allocation protects the playing field ii. The option of only developing the existing buildings and car park <ol style="list-style-type: none"> a. This option is being taken forward iii. Ensuring satisfactory access <ol style="list-style-type: none"> a. The County Council raises no highway objections and says access should be achievable via Foster Road <p>The consultation has raised no issues not identified in the Issues and Options 2 Part</p>		

2 report. Need to coordinate with Southern Fringe Policy

Green – No significant planning objections to the allocation. (Site boundary has been redrawn to exclude the school playing fields. The site area has been reduced to 1.49ha and the potential residential capacity has increased to 67 to reflect achievable densities.)

Key Issues raised during Proposed Submission consultation

Site R16: Cambridge Professional Development Centre, Foster Road	
Total Representations: 6	
Object: 4	
Support: 2	
Objections	<ul style="list-style-type: none"> • Sport England objects if playing fields are to be lost without evidence that the site is no longer needed for sports provision or replacement provision is made; • Allocation will exacerbate existing traffic levels on Trumpington Road and surrounding side streets; • Site should form part of Fawcett School expansion; • Allocation will detrimentally affect adjacent housing for elderly and vulnerable people.
Support	<ul style="list-style-type: none"> • General support.

Minor Modifications suggested following Proposed Submission consultation and implications for Sustainability Appraisal

29. No changes to Site R16: Cambridge Professional Development Centre, Foster Road are suggested in the Addendum to the Cambridge Local Plan 2014: Proposed Submission document. There are therefore no impacts on the findings of the Sustainability Appraisal.

Site R17: Mount Pleasant House, Mount Pleasant

Key issues raised during Issues and Options 2 (2013) consultation

Site Number: R17		
Location: Mount Pleasant House		
Total representations: 16		
Object: 4	Support: 5	Comment: 7
KEY ISSUES ARISING FROM CONSULTATION		
Objections	<ul style="list-style-type: none"> • Valuable office building in central location • Building should be refurbished • Air quality poor for residential development 	
Support	<ul style="list-style-type: none"> • Fully support development • Higher number of units required to increase viability 	
Comments	<ul style="list-style-type: none"> • Use for University student accommodation • Potential for mixed use scheme • Potential improvement on existing ugly building 	

	<ul style="list-style-type: none"> • Potentially over scale tall buildings • Consider sensitive location in Conservation Area • Needs high quality design • Development should seek to reduce flood risk to site and third parties • Need to consider traffic options • Review public transport connections • Access should be achieved of the A1134 Mount Pleasant
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ANALYSIS OF KEY ISSUES AND OFFICER RESPONSE

Representations: total 16; object 4; support 5; comment 7.

Key issues are:

- i. The loss commercial building in central location
 - a. The site is capable of making a significant contribution to meeting residential need and, while occupied currently, the fact that it is adjacent to residential/collegiate properties means that residential development will be attractive.
- ii. Need for careful design in sensitive location
 - a. This can be addressed through planning and design
- iii. Flood risk
 - a. This can be addressed through mitigation and remediation
- iv. Ensuring satisfactory access
 - a. The County Council raises no highway objections and says access should be achieved of the A1134 Mount Pleasant

The consultation has raised no issues not identified in the Issues and Options 2 Part 2 report.

Amber – Significant planning concerns expressed, but can be addressed (The site to be allocated as defined in Issues and Options 2.)

Key Issues raised during Proposed Submission consultation

Site R17: Mount Pleasant House, Mount Pleasant	
Total Representations: 5	
Object: 4	Support: 1
Objections	<ul style="list-style-type: none"> • Landowner supports allocation of the land for residential development, but requests that the indicative capacity is increased to at least 87 units at 153dph; • Due to its proximity to existing Colleges, allocation should be amended to provide for student accommodation; • Allocation will exacerbate existing traffic levels in area; • Loss of employment use will impact on mix of uses and vitality of area.
Support	<ul style="list-style-type: none"> • General support.

Minor Modifications suggested following Proposed Submission consultation and implications for Sustainability Appraisal

30. No changes to Site R17: Mount Pleasant House are suggested in the Addendum to the Cambridge Local Plan 2014: Proposed Submission document. There are therefore no impacts on the findings of the Sustainability Appraisal.

Site M4: Police Station, Parkside

Key issues raised during Issues and Options 2 (2013) consultation

Site Number: M4		
Location: Police Station Parkside		
Total representations: 14		
Object: 6	Support: 2	Comment: 6
Key Issues ARISING FROM CONSULTATION		
Objections	<ul style="list-style-type: none"> • Need to retain Police Station in city centre • Prestigious site – develop as single use such as quality hotel • Prestigious site – develop as high quality mixed use scheme • Development should prioritise historic character of the area • Hotel next to fire station not ideal for hotel • Is hotel necessary here? • No further residential development in the area • Need traffic strategy 	
Support	<ul style="list-style-type: none"> • Suitable as mixed use • Existing building blights Parker’s Piece and should be demolished 	
Comment	<ul style="list-style-type: none"> • Where is the relocation alternative? Should not be greenfield site • Possible location for student accommodation, either stand alone or as part of mixed use scheme • Allow student accommodation in lieu of affordable housing • Care over design needed in very sensitive location • Potential adverse impact on skyline – oppose increase in height • Need to consider a transport strategy • Access onto Warkworth Street or Parkside should be achievable 	
ANALYSIS OF KEY ISSUES AND OFFICER RESPONSE		
<p>Representations: total 14; object 6; support 2; comment 6. More representations of objection than support</p> <p>Key issues are:</p>		

- i. The mix of uses and the desirability of development for a hotel
 - a. Consideration of the hotel study and existing proposals suggests a residential only allocation is more appropriate
 - ii. Design suitable to the sensitive location
 - a. This can be addressed through planning and design
 - iii. The relocation of the Police Station
 - a. Police would prefer Southern HQ building with good access to main road network; some City centre presence to be maintained
 - iv. Traffic and access
 - a. The County Council raises no highway objections; says there is a need to discuss a transport strategy; and notes access from Warkworth Street or Parkside should be achievable
- With the exception of the relocation of the Police Station, the consultation has raised no fundamental issues not identified in the Issues and Options 2 Part 2 report.

Green – No significant planning objections to the allocation (Originally consulted for mixed use (residential & hotel), but review, including consideration of the hotel study suggests a residential only allocation is more appropriate.)

Key Issues raised during Proposed Submission consultation

Site M4: Police Station, Parkside	
Total Representations: 2	
Object: 2	Support: 0
Objections	<ul style="list-style-type: none"> • Police station needed to deal with crime in the centre; • All car parking for the development must be provided on site to prevent further impacts on neighbouring streets; • Adjacent site already overdeveloped.
Support	Not applicable

Minor Modifications suggested following Proposed Submission consultation and implications for Sustainability Appraisal

31. No changes to Site M4: Police Station, Parkside are suggested in the Addendum to the Cambridge Local Plan 2014: Proposed Submission document. There are therefore no impacts on the findings of the Sustainability Appraisal.

Site R40: Land north of Teversham Drift

Key issues raised during Issues and Options 2 (2013) consultation

Site Number: R40
Location: Land north of Teversham Drift
Total representations: Site not consulted on specifically as it is an established allocated site. The principle of whether the wider Cambridge East site should remain allocated, be safeguarded or be returned to the Green Belt was consulted upon as part of Issues and Options consultation. Details of these comments can be found in Appendix 5 of this document.
Green – No significant planning objections to retained allocation, which can come forward while the airport continues to operate.

Key Issues raised during Proposed Submission consultation

Site R40: Land north of Teversham Drift	
Total Representations: 9	
Object: 8	Support: 1
Objections	<ul style="list-style-type: none">• Additional traffic impacts on highway safety;• Lack of infrastructure to accommodate rise in population, e.g. schools;• Loss of agricultural land;• Development close to the airport in the air safeguarding zone;• Adverse impact on biodiversity;• Coalescence of Cambridge with Teversham;• Negative impact on views.• Too much development in this area.
Support	<ul style="list-style-type: none">• General support.

Minor Modifications suggested following Proposed Submission consultation and implications for Sustainability Appraisal

32. No changes to Site R40: Land north of Teversham Drift are suggested in the Addendum to the Cambridge Local Plan 2014: Proposed Submission document. There are therefore no impacts on the findings of the Sustainability Appraisal.

Site R41: Land north of Coldham's Lane

Key issues raised during Issues and Options 2 (2013) consultation

Site Number: R41
Location: Land north of Coldham's Lane
Total representations: Site not consulted on specifically as it is an established allocated site. The principle of whether the wider Cambridge East site should remain allocated, be safeguarded or be returned to the Green Belt was consulted upon as part of Issues and Options consultation. Details of these comments can be found in Appendix 5 of this document.
Green – No significant planning objections to retained allocation, which can come forward while the airport continues to operate.

Key Issues raised during Proposed Submission consultation

Site R41: Land north of Coldham's Lane	
Total Representations: 3	
Object: 3	Support: 0
Objections	<ul style="list-style-type: none">• Marshall have objected to the site allocation as the development would compromise the safe operation of the airport;• Additional traffic impacts on highway safety;• Lack of infrastructure to accommodate rise in population, e.g. schools;• Development close to the airport in the air safeguarding zone;• Area provides open space between Cambridge and Cherry Hinton;• Negative impact on views;• Parking on Hatherdene Close will worsen;• Too much development in this area.
Support	Not applicable

Minor Modifications suggested following Proposed Submission consultation and implications for Sustainability Appraisal

33. No changes to Site R41: Land north of Coldham's Lane are suggested in the Addendum to the Cambridge Local Plan 2014: Proposed Submission document. There are therefore no impacts on the findings of the Sustainability Appraisal.

Site R42a: Clay Farm south of Long Road

Key issues raised during Issues and Options 2 (2013) consultation

Site Number: R42a
Location: Clay Farm, south of Long Road
Total representations: Site not consulted on specifically as it is an established allocated site. The existing strategy, including established allocations (some with existing planning permission) were consulted upon as part of Issues and Options consultation. Details of these comments can be found in Appendix 5 of this document.
Green – No significant planning objections to retained allocation.

Key Issues raised during Proposed Submission consultation

Site R42a: Clay Farm south of Long Road	
Total Representations: 0	
Object: 0	Support: 0
Objections	Not applicable
Support	Not applicable

Minor Modifications suggested following Proposed Submission consultation and implications for Sustainability Appraisal

34. No changes to Site R42a: Clay Farm south of Long Road are suggested in the Addendum to the Cambridge Local Plan 2014: Proposed Submission document. There are therefore no impacts on the findings of the Sustainability Appraisal.

Site R42b: Trumpington Meadows

Key issues raised during Issues and Options 2 (2013) consultation

Site Number: R42b
Location: Trumpington Meadows
Total representations: Site not consulted on specifically as it is an established allocated site. The existing strategy, including established allocations (some with existing planning permission) were consulted upon as part of Issues and Options consultation. Details of these comments can be found in Appendix 5 of this document.
Green – No significant planning objections to retained allocation.

Key Issues raised during Proposed Submission consultation

Site R42b: Trumpington Meadows	
Total Representations: 0	
Object: 0	Support: 0
Objections	Not applicable
Support	Not applicable

Minor Modifications suggested following Proposed Submission consultation and implications for Sustainability Appraisal

35. No changes to Site R42b: Trumpington Meadows are suggested in the Addendum to the Cambridge Local Plan 2014: Proposed Submission document. There are therefore no impacts on the findings of the Sustainability Appraisal.

Site R42c: Glebe Farm 1 and 2

Key issues raised during Issues and Options 2 (2013) consultation

Site Number: R15		
Location: Glebe Farm		
Total representations: 17		
Object: 4	Support: 8	Comment: 5
KEY ISSUES ARISING FROM CONSULTATION		
Objections	<ul style="list-style-type: none"> • Object to further development in Trumpington Area • Time needed to integrate committed development with local community • Assess impact of present developments first • Use site for allotments • Possible overlooking of Glebe Farmhouse • Increased pollution • May obstruct access to Glebe Farmhouse • Increased traffic and congestion 	
Support	<ul style="list-style-type: none"> • Support development of the site • Support extension to Glebe Farm development • Will have good access to local services on Southern Fringe 	
Comments	<ul style="list-style-type: none"> • Relocate proposed allotment/community gardens in Novo development • Possible noise, traffic, loss of privacy • Area needs transport, community and other infrastructure • Need to Household Recycling Centre has still to be resolved • Concerned about traffic pressure on Hills Road & Trumpington Road 	

	<ul style="list-style-type: none"> • Review public transport connections • Preferable to access through current development site than onto Addenbrooke's Road • Improve links to main cycleways • Need to consider traffic options • Need to respects layout of adjacent developments
ANALYSIS OF KEY ISSUES AND OFFICER RESPONSE	
<p>Representations: total 17; object 4; support 8; comment 5. Support and comments significantly outnumber objections.</p> <p>Key issues are:</p> <ol style="list-style-type: none"> i. Integration with existing and proposed development <ol style="list-style-type: none"> a. This can be addressed through planning and design ii. The ongoing search for a Household Recycling Centre <ol style="list-style-type: none"> a. This has already been discussed at length and this is not considered to be suitable site iii. Ensuring satisfactory access <ol style="list-style-type: none"> a. The County Council raises no highway objections and says access is preferable through the current development site rather that onto Addenbrooke's Road <p>The consultation has raised no issues not identified in the Issues and Options 2 Part 2 report. Need to coordinate with Southern Fringe Policy</p> <p style="background-color: #92d050;">Green – No significant planning objections to the allocation (The site to be allocated as defined in Issues and Options 2. Issues and Options R15 incorporated into R42c)</p>	

Site Number: R42c
Location: Glebe Farm
<p>Total representations: Site not consulted on specifically as it is an established allocated site. The existing strategy, including established allocations (some with existing planning permission) were consulted upon as part of Issues and Options consultation. Details of these comments can be found in Appendix 5 of this document.</p> <p style="background-color: #92d050;">Green – No significant planning objections to retained allocation.</p>

Key Issues raised during Proposed Submission consultation

Site R42c: Glebe Farm 1 and 2	
Total Representations: 3	
Object: 2	Support: 1
Objections	<ul style="list-style-type: none"> • Density of Glebe Farm 2 is too high; • Allotments should be moved to buffer Shelford Road properties; • Cycle path along Exeter Close is impractical; • Restriction of vehicular access to Glebe farmhouse; • Loss of privacy;

	<ul style="list-style-type: none"> • Impact on biodiversity, particularly trees and hedgerows; • Additional traffic impact.
Support	<ul style="list-style-type: none"> • General support.

Minor Modifications suggested following Proposed Submission consultation and implications for Sustainability Appraisal

36. No changes to R42c: Glebe Farm 1 and 2 are suggested in the Addendum to the Cambridge Local Plan 2014: Proposed Submission document. There are therefore no impacts on the findings of the Sustainability Appraisal.

Site R42d: Bell School, Babraham Road

Key issues raised during Issues and Options 2 (2013) consultation

Site Number: R42d
Location: Bell School, Babraham Road
Total representations: Site not consulted on specifically as it is an established allocated site. The existing strategy, including established allocations (some with existing planning permission) were consulted upon as part of Issues and Options consultation. Details of these comments can be found in Appendix 5 of this document.
Green – No significant planning objections to retained allocation.

Key Issues raised during Proposed Submission consultation

Site R42d: Bell School, Babraham Road	
Total Representations: 2	
Object: 1	Support: 1
Objections	<ul style="list-style-type: none"> • Need to overcome issues with the junction of the site with Babraham Road.
Support	<ul style="list-style-type: none"> • General support.

Minor Modifications suggested following Proposed Submission consultation and implications for Sustainability Appraisal

37. No changes to R42d: Bell School, Babraham Road are suggested in the Addendum to the Cambridge Local Plan 2014: Proposed Submission document. There are therefore no impacts on the findings of the Sustainability Appraisal.

Site R43: NIAB 1

Key issues raised during Issues and Options 2 (2013) consultation

Site Number: R43
Location: NIAB 1
Total representations: Site not consulted on specifically as it is an established allocated site. The existing strategy, including established allocations (some with existing planning permission) were consulted upon as part of Issues and Options consultation. Details of these comments can be found in Appendix 5 of this document.
Green – No significant planning objections to retained allocation.

Key Issues raised during Proposed Submission consultation

Site R43: NIAB 1	
Total Representations: 3	
Object: 2	Support: 1
Objections	<ul style="list-style-type: none">• Additional traffic impacts on highway safety;• Concern about community infrastructure;• Concern about access to public transport;• Parking provision needs to be increased;• Impact on biodiversity;• Impact on quality of life.
Support	<ul style="list-style-type: none">• General support.

Minor Modifications suggested following Proposed Submission consultation and implications for Sustainability Appraisal

38. In order to reflect the fact that 84 dwellings were built out on the site prior to the start of the plan period, this number has been removed from the site’s outstanding capacity. This change is in the Addendum to the Cambridge Local Plan 2014: Proposed Submission document marked as PM/B/006 and reads:

“Capacity: ~~1,780~~ 1,696 dwellings”

39. Following consideration of the impact of these changes on the Sustainability Appraisal Framework, it has been concluded that these changes do not materially alter the findings of the Sustainability Appraisal.

Site R44: Betjeman House

Key issues raised during Issues and Options 2 (2013) consultation

Site Number: R44
Location: Betjeman House
Total representations: Site not consulted on specifically as it is an established allocated site. This site an established allocation (with existing planning permission for some of it) was consulted upon as part of Issues and Options consultation. Details of these comments can be found in Appendix 3 of this document.
Green – No significant planning objections to retained allocation.

Key Issues raised during Proposed Submission consultation

Site R44: Betjeman House	
Total Representations: 2	
Object: 1	Support: 1
Objections	<ul style="list-style-type: none">English Heritage requires reference the need to retain the Flying Pig Public House and for development to be sensitive to the views from the Botanic Gardens (Registered Historic Park and Garden).
Support	<ul style="list-style-type: none">General support.

Minor Modifications suggested following Proposed Submission consultation and implications for Sustainability Appraisal

40. No changes to Site R44: Betjeman House are suggested in the Addendum to the Cambridge Local Plan 2014: Proposed Submission document. There are therefore no impacts on the findings of the Sustainability Appraisal.

Site R45: Land north of Newmarket Road

Key issues raised during Issues and Options 2 (2013) consultation

Site Number: R45
Location: Land north of Newmarket Road
Total representations: Site not consulted on specifically as it is an established allocated site. The principle of whether the wider Cambridge East site should remain allocated, be safeguarded or be returned to the Green Belt was consulted upon as part of Issues and Options consultation. Details of these comments can be found in Appendix 5 of this document.
Green – No significant planning objections to retained allocation, which can come forward while the airport continues to operate.

Key Issues raised during Proposed Submission consultation

Site R45: Land north of Newmarket Road	
Total Representations: 0	
Object: 0	Support: 0
Objections	Not applicable
Support	Not applicable

Minor Modifications suggested following Proposed Submission consultation and implications for Sustainability Appraisal

41. No changes to Site R45: Land north of Newmarket Road are suggested in the Addendum to the Cambridge Local Plan 2014: Proposed Submission document. There are therefore no impacts on the findings of the Sustainability Appraisal.

Site M1: 379 – 381 Milton Road

Key issues raised during Issues and Options 2 (2013) consultation

Site Number: M1		
Location: 379-381 Milton Road		
Total representations: 9		
Object: 3	Support: 3	Comment: 3
Key Issues ARISING FROM CONSULTATION		
Objections	<ul style="list-style-type: none"> • Retain for commercial use, but not housing • Inclusion of residential uses • Flooding 	
Support	<ul style="list-style-type: none"> • Develop as part of coherent approach to north eastern part of CityHigh quality employment related development • Good location and support proximity of employment and housing • Lack of transport strategy for sites 	
Comment	<ul style="list-style-type: none"> • Suitable for student accommodation, either stand alone or as part of mixed use • Allow student accommodation in lieu of affordable housing • Anglian Water concerned about possible encroachment on Pumping Station • Need to consider a transport strategy • Access onto Milton Road should be achievable 	
ANALYSIS OF KEY ISSUES AND OFFICER RESPONSE		
<p>Representations: total 9; object 3; support 3; comment 3. A balance of representations across object, support and comment.</p> <p>Key issues are:</p> <ol style="list-style-type: none"> i. Suitability of site for residential component <ol style="list-style-type: none"> a. Adjacent to residential area and is capable of taking mixed use 		

<p>ii. Traffic and access</p> <p>a. County Council raises no objections, wishes to see a transport strategy and says access onto Milton Road should be achievable</p> <p>The consultation has raised no issues not identified in the Issues and Options 2 Part 2 report. Need to address the issue of the need for housing v the need for student accommodation</p>
<p>Amber – Significant planning concerns expressed, but can be addressed (Originally consulted on 40 dwellings and 1.95ha employment reworked after consulting with Urban Design Team. Proposed to be allocated for 95 dwellings and 0.5ha employment)</p>

Key Issues raised during Proposed Submission consultation

Site M1: 379 – 381 Milton Road	
Total Representations: 2	
Object: 2	Support: 0
Objections	<ul style="list-style-type: none"> Landowner wants the site to be allocated as residential only, to be developed within the life of the plan; Possible encroachment on Anglian Water pumping station requires early consultation with Anglian Water.
Support	Not applicable.

Minor Modifications suggested following Proposed Submission consultation and implications for Sustainability Appraisal

42. No changes to Site M1: 379 – 381 Milton Road are suggested in the Addendum to the Cambridge Local Plan 2014: Proposed Submission document. There are therefore no impacts on the findings of the Sustainability Appraisal.

Site M2: Clifton Road Area

Key issues raised during Issues and Options 2 (2013) consultation

Site Number: M2		
Location: Clifton Road Industrial Estate		
Total representations: 14		
Object: 5	Support: 5	Comment: 4
Key Issues ARISING FROM CONSULTATION		
Objections	<ul style="list-style-type: none"> Royal Mail objects to the current allocation. No objection to identification of the site as part of proposed redevelopment provided the Mail Centre is located elsewhere with costs met from the disposal of the site Should be redeveloped as a prime employment location related to the station Object to inclusion of residential use Contamination and noise limit options for residential use 	

	<ul style="list-style-type: none"> • Possible site for concert hall • Site for a 'flexi arts' centre • Need for a transport strategy
Support	<ul style="list-style-type: none"> • Support mixed use development Opportunity to improve area, e.g. link to station, retail units, café quarter, access to Rustat Road, open space, extend Junction • Development should support Cambridge Leisure Park • Land for Cambridge University, ARU or language schools
Comment	<ul style="list-style-type: none"> • Suitable for student residential accommodation, either stand alone or as part of mixed use • Allow student accommodation in lieu of affordable housing • Consider the impact of the railway – as barrier or opportunity • Need to consider a transport strategy • Access should be achievable onto Cherry Hinton road, which would need to be subject to capacity analysis • Need better bike and pedestrian connections, including measure to complement the Chisholm Trail

ANALYSIS OF KEY ISSUES AND OFFICER RESPONSE

Representations: total 14; object 5; support 5; comment 4. A balance of representations across object, support and comment.

Key issues are:

- i. Competing demands for development on this key site close to the Station
 - a. The site has seen significant periods of vacancies over recent years; furthermore the site is currently underused with extensive areas of car parking. The site is capable of being redeveloped as a new high quality mixed use scheme.
- ii. Comprehensive or piecemeal approach
 - a. A comprehensive approach is required and this is addressed through the policies for Major Areas of Change
- iii. Possible contamination on site
 - a. This can be addressed by appropriate remediation and mitigation; it may restrict the type of housing provided
- iv. Traffic, access and new links into the wider area
 - a. The County Council raises no highway objections; and says access should be achievable onto Cherry Hinton Road, which would need to be subject to capacity analysis.
 - b. Any transport and viability study would have to assess the issue of links into the wider area

The consultation has raised no fundamental issues not identified in the Issues and Options 2 Part 2 report.

Amber – Significant planning concerns expressed, but can be addressed (Originally consulted on 100 dwellings on an employment led development, but following representations received at Issues and Options stage and advice from the Urban Design Team it is proposed to allocated for 550 dwellings with 2ha employment.)

Key Issues raised during Proposed Submission consultation

Site M2: Clifton Road Area	
Total Representations: 2	
Object: 2	Support: 0
Objections	<ul style="list-style-type: none"> Royal Mail have no fundamental objection to the identification of Cambridge Mail Centre as part of the proposed redevelopment site for a mix of employment and residential uses, provided that the Mail Centre is relocated/re-provided elsewhere prior to the site's redevelopment; Loss of current office space in the Clifton Road area; Harm to Cambridge cluster if businesses are not able to locate in central Cambridge.
Support	Not applicable

Minor Modifications suggested following Proposed Submission consultation and implications for Sustainability Appraisal

43. No changes to Site M2: Clifton Road Area are suggested in the Addendum to the Cambridge Local Plan 2014: Proposed Submission document. There are therefore no impacts on the findings of the Sustainability Appraisal.

Site M3: Michael Young Centre, Purbeck Road

Key issues raised during Issues and Options 2 (2013) consultation

Site Number: M3		
Location: Michael Young Centre		
Total representations: 9		
Object: 3	Support: 4	Comment: 2
Key Issues ARISING FROM CONSULTATION		
Objections	<ul style="list-style-type: none"> Retain for light industrial use Retain as 'protected industrial site' Access and proximity to railway make it unsuitable for housing Preserve buildings of historic interest Need for a traffic strategy Create greater connectivity for cyclists and pedestrians Errors in the technical assessment 	
Support	<ul style="list-style-type: none"> Much the same use, but upgraded Support for a range of mixed uses, including offices, education, student accommodation, light industrial, housing Designation as 'protected industrial site' should be removed 	

	<ul style="list-style-type: none"> • Use for expansion of Hills Road Sixth Form College • Suitable for use by Anglia Ruskin • Possible access from Purbeck Road and Harrison Drive • Site can be delivered from a technical viewpoint
Comment	<ul style="list-style-type: none"> • Open spaces at Homerton College are not public • Purbeck Road is a private road and not to highway standards • Need for transport strategy • Access issues • Possible access from Purbeck Road, which is private road

ANALYSIS OF KEY ISSUES AND OFFICER RESPONSE

Representations: total 9; object 3; support 4; comment 2.

Key issues are:

- i. Competing demands for development and retention for light industry
 - a. The site currently has relatively little industrial use on it, it is also currently underused. The site is capable of being redeveloped as a new mixed use scheme.
- ii. Traffic and access
 - a. The County Council raises no highway objections; says there is a need to discuss a transport strategy; and notes access should be from Purbeck Road, which is a private road

The consultation notes some errors in the assessment and flags up the issue of Purbeck road being a private road. Otherwise it has raised no fundamental issues not identified in the Issues and Options 2 Part 2 report. Need to address the errors (if there were errors) in the technical assessment – was this related to open space?

Green – No significant planning objections to the allocation (The site to be allocated as defined in Issues and Options 2.)

Key Issues raised during Proposed Submission consultation

Site M3: Michael Young Centre, Purbeck Road	
Total Representations: 2	
Object: 2	Support: 0
Objections	<ul style="list-style-type: none"> • Greater clarity should be provided on the list of potential uses within the allocation; • Access from Purbeck Road is unsuitable.
Support	Not applicable

Minor Modifications suggested following Proposed Submission consultation and implications for Sustainability Appraisal

44. No changes to Site M3: Michael Young Centre, Purbeck Road are suggested in the Addendum to the Cambridge Local Plan 2014: Proposed Submission document. There are therefore no impacts on the findings of the Sustainability Appraisal.

Site M5: 82 – 88 Hills Road and 57 – 63 Bateman Street

Key issues raised during Issues and Options 2 (2013) consultation

Site Number: M5		
Location: 82-90 Hills Road & 57-63 Bateman Street		
Total representations: 9		
Object: 3	Support: 3	Comment: 3
Key Issues ARISING FROM CONSULTATION		
Objections	<ul style="list-style-type: none"> • Suitable for student accommodation • Flood risk • Adverse impact on traffic • Need for a transport strategy • Adverse impact on air quality 	
Support	<ul style="list-style-type: none"> • Support this option • Potential for mixed residential, office and retail use • Residential use welcomed 	
Comment	<ul style="list-style-type: none"> • Hills Road property already undergoing extensive remodelling • Development must enhance frontage to Hills Road and Botanic Garden • No more than four storeys • Retain villas along Bateman Street • Need for a transport assessment • Access should be achieved onto Bateman Street 	
ANALYSIS OF KEY ISSUES AND OFFICER RESPONSE		
<p>Representations: total 9; object 3; support 3; comment 3. There is an even balance of object, support and comment responses.</p> <p>Key issues are:</p> <ol style="list-style-type: none"> i. Design suitable to the sensitive location <ol style="list-style-type: none"> a. This can be addressed through planning and design ii. Potential flood risk <ol style="list-style-type: none"> a. This can be addressed through mitigation and remediation; there will be policies in the Plan about flooding and integrated surface water management iii. Traffic and access <ol style="list-style-type: none"> a. The County Council raises no highway objections; says there is a need to discuss a transport strategy; and notes access should be achieved onto Bateman Street, although there are constraints that need further consideration <p>The consultation has raised no fundamental issues not identified in the Issues and Options 2 Part 2 report. Need to coordinate with Station Area West policy and Hills Road Policy. Air quality issues can be addressed through mitigation & remediation, Policy in the Local Plan will ensure no deterioration of air quality from new development.</p>		

Green – No significant planning objections to the allocation (The site to be allocated as defined in Issues and Options 2, but with boundary redrawn to reflect current refurbishment at 90 Hills Road.)

Key Issues raised during Proposed Submission consultation

Site M5: 82 – 88 Hills Road and 57 – 63 Bateman Street	
Total Representations: 1	
Object: 1	Support: 0
Objections	<ul style="list-style-type: none"> Landowner has objected on the basis that the site’s size and the capacity should be amended to increase site to 0.58 hectares and increase the quantum of residential development, whilst allowing for office and education uses.
Support	Not applicable

Minor Modifications suggested following Proposed Submission consultation and implications for Sustainability Appraisal

45. No changes to Site M5: 82 – 88 Hills Road and 57 – 63 Bateman Street are suggested in the Addendum to the Cambridge Local Plan 2014: Proposed Submission document. There are therefore no impacts on the findings of the Sustainability Appraisal.

Site R6: 636 – 656 Newmarket Road, Holy Cross Church, East Barnwell Community Centre and Meadowlands, Newmarket Road

Key issues raised during Issues and Options 2 (2013) consultation

Site Number: R6		
Location: 636-656 Newmarket Road, Holy Cross Church Hall, East Barnwell Community Centre and Meadowlands, Newmarket Road		
Total representations: 11		
Object: 6	Support: 2	Comment: 3
KEY ISSUES ARISING FROM CONSULTATION		
Objections	<ul style="list-style-type: none"> Loss of recreation spaces Want to develop the site as a hub for community facilities Proposed scale of development out of character with the area Problems of access onto Newmarket Road 	
Support	<ul style="list-style-type: none"> Fully support Support, but must include replacement community facilities More efficient use of land 	
Comments	<ul style="list-style-type: none"> Suitable for student accommodation Retain Trees 	

	<ul style="list-style-type: none"> • Keep open the passage that provides access at the rear of Peverel Road • Access to be resolved • Explore public transport and cycle links • Impact on Newmarket Road to be assessed • Access to Barnwell Road or Peverel Road acceptable
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ANLYSIS OF KEY ISSUES AND OFFICER RESPONSE

Representations: total 11; object 6; support 2; comment 3. Objections significantly outweigh support.

Key issues are:

- i. Competing demand for use as community facility hub
 - a. The County Council has plans for a sizable community hub on the site of the current community centre and Christ the Redeemer Church. This will impact on housing numbers and this may be better as a mixed use allocation. The Clay farm community centre might be model.
- ii. Loss of recreation spaces
 - a. Re-provision will be sought in line with policy on the protection of facilities, subject to reviewing need
- iii. Ensuring satisfactory access
 - a. The County Council raises no highway objections and says vehicular access onto Barnwell Road or Peverel Road should be achievable

The consultation has raised no issues not identified in the Issues and Options 2 Part 2 report.

Amber – Significant planning concerns expressed, but can be addressed (The site to be allocated as defined in Issues and Options 2. Originally consulted on for residential, now mixed use, same numbers)

Key Issues raised during Proposed Submission consultation

Site R6: 636 – 656 Newmarket Road, Holy Cross Church, East Barnwell Community Centre and Meadowlands, Newmarket Road	
Total Representations: 2	
Object: 2	Support: 0
Objections	<ul style="list-style-type: none"> • Unsuitable site for 75 dwellings giving vehicular access onto the Newmarket Road.
Support	Not applicable

Minor Modifications suggested following Proposed Submission consultation and implications for Sustainability Appraisal

46. No changes to Site R6: 636 – 656 Newmarket Road, Holy Cross Church, East Barnwell Community Centre and Meadowlands, Newmarket Road are suggested in the Addendum to the Cambridge Local Plan 2014: Proposed Submission document. There are therefore no impacts on the findings of the Sustainability Appraisal.

Site R21: 315-349 Mill Road and Brookfields

Key issues raised during Issues and Options 2 (2013) consultation

Site Number: R21		
Location: 315-349 Mill Road		
Total representations: 16		
Object: 3	Support: 2	Comment: 11
KEY ISSUES ARISING FROM CONSULTATION		
Objections	<ul style="list-style-type: none"> • Make use of site as health facility • Use site to create green space for area 	
Support	<ul style="list-style-type: none"> • Fully support development 	
Comments	<ul style="list-style-type: none"> • Priority for green space and mixed development with family housing • Provide social housing • No student flats • Suitable for student housing, either stand alone or as mixed use • Affordable housing • Take into account impact of the proposed mosque • Good quality design • Road frontage requires careful consideration • Access to Mill Road should be achievable • Share access with adjacent sites • Improve condition on routes to Sainsbury and town centre for cyclists 	
ANLYSIS OF KEY ISSUES AND OFFICER RESPONSE		
<p>Representations: total 16; object 3; support 2; comment 11. The consultation elicited more comments than objections or representation of support.</p> <p>Key issues are:</p> <ol style="list-style-type: none"> The priority for open space in the development <ol style="list-style-type: none"> This can be addressed through planning and design The type of housing to be provided <ol style="list-style-type: none"> Development for a mix of types and sizes with reference to the Plan and the Affordable Housing SPD The need for good quality development <ol style="list-style-type: none"> This can be addressed through planning and design Ensuring satisfactory access <ol style="list-style-type: none"> The County Council raises no highway objections and says access to Mill Road should be achievable <p>Apart from the issue of open space, the consultation has raised no issues not identified in the Issues and Options 2 Part 2 report.</p>		
<p>Green – No significant planning objections to the allocation (Since consultation this site has been extended to include Brookfields Hospital site following representations received from the Brookfields site owners. The site area has increased to to 2.87ha, residential capacity has increased to 128 with 100sq.m</p>		

employment floorspace.)

Key Issues raised during Proposed Submission consultation

Site R21: 315-349 Mill Road and Brookfields	
Total Representations: 14	
Object: 13	Support: 1
Objections	<ul style="list-style-type: none"> • Landowner and developer of part of the site wish to see site modified to propose a phased development with student housing on the Mill Road frontage as an early phase of development, necessary to meet urgent needs and general needs housing and employment on the remainder of the site as it becomes available; • NHS Trust – Brookfields Hospital support the allocation of the site, but would wish to see allocation broadened to retain some form of health-related use within site; • Masterplan required for this site and needs community consultation; • Development will need to enhance area; • Reduce density of the site; • Provide retail facilities on the site; • No further residential development in the area; • Family and affordable housing needed; • No student residential on the site, particularly not in lieu of affordable dwellings; • Open space provided on the site; • Impact on the conservation area; • Health centre is a valued amenity for the local area and should be retained; • Parking facilities will be negatively impacted; • More traffic will give rise to congestion; • Development will put pressure on existing retail resources with associated rise in deliveries.
Support	Not applicable

Minor Modifications suggested following Proposed Submission consultation and implications for Sustainability Appraisal

47. In order to respond to representations (Representation Numbers 27469 and 27099) and to reflect the current mix of uses on the site, a minor modification is suggested to Site R21. This change is in the Addendum to the Cambridge Local Plan 2014: Proposed Submission document marked as PM/B/007 and reads:

“Capacity: 128 dwellings 46 dph Up to 1 hectare employment floorspace (including healthcare)”

48. Following consideration of the impact of this change on the Sustainability Appraisal Framework, it has been concluded that this change does not materially alter the findings of the Sustainability Appraisal.

Site M13: West Cambridge Site

Key issues raised during Issues and Options 2 (2013) consultation

Site Number: M13
Location: West Cambridge Site
Total representations: Site not consulted on specifically as it is an established allocated site. The existing strategy, including established allocations (some with existing planning permission) were consulted upon as part of Issues and Options consultation. Details of these comments can be found in Appendix 5 of this document. Options to intensify use of the site were consulted upon in Issues and Options consultation. Details of these comments can be found in Appendix 3 of this document.
Green – No significant planning objections to retained allocation.

Key Issues raised during Proposed Submission consultation

Site M13: West Cambridge Site	
Total Representations: 1	
Object: 1	Support: 0
Objections	<ul style="list-style-type: none"> Site M13 West Cambridge identifies existing uses as 'agricultural', which is incorrect. The paddock areas of the site are for holding of animals associated with the Veterinary School, not for agricultural purposes.
Support	Not applicable

Minor Modifications suggested following Proposed Submission consultation and implications for Sustainability Appraisal

49. No changes to Site M13: West Cambridge Site are suggested in the Addendum to the Cambridge Local Plan 2014: Proposed Submission document. There are therefore no impacts on the findings of the Sustainability Appraisal.

Site M14: Station Road West

Key issues raised during Issues and Options 2 (2013) consultation

Site Number: M14
Location: Station Road West
Total representations: Site not consulted on specifically as it is an established allocated site. The existing strategy, including established allocations (some with existing planning permission) were consulted upon as part of Issues and Options

consultation. Details of these comments can be found in Appendix 5 of this document.

Green – No significant planning objections to retained allocation.

Key Issues raised during Proposed Submission consultation

Site M14: Station Road West	
Total Representations: 0	
Object: 0	Support: 0
Objections	Not applicable
Support	Not applicable

Minor Modifications suggested following Proposed Submission consultation and implications for Sustainability Appraisal

50. No changes to Site M14: Station Road West are suggested in the Addendum to the Cambridge Local Plan 2014: Proposed Submission document. There are therefore no impacts on the findings of the Sustainability Appraisal.

Site M15: Cambridge Biomedical Campus, including Addenbrooke's Hospital

Key issues raised during Issues and Options 2 (2013) consultation

Site Number: M15
Location: Cambridge Biomedical Campus including Addenbrooke's Hospital
Total representations: Site not consulted on specifically as it is an established allocated site. The existing strategy, including established allocations (some with existing planning permission) were consulted upon as part of Issues and Options consultation. Details of these comments can be found in Appendix 5 of this document.
Green – No significant planning objections to retained allocation.

Key Issues raised during Proposed Submission consultation

Site M15: Cambridge Biomedical Campus, including Addenbrooke's Hospital	
Total Representations: 1	
Object: 1	Support: 0
Objections	<ul style="list-style-type: none"> Allocation 9.09 - the expansion land - should be separately identified as it has a different status to the 9.02 land which was allocated for development in the current Local Plan and has outline planning permission as opposed to the expansion land which was "safeguarded land for post 2016"; The size of this area should be properly set out; the full 10.28 hectares referred to in the current Local Plan has been assumed whereas once 'strategic infrastructure' is allowed for – i.e. the Addenbrooke's Road embankment and the pumping station - the remaining area is in fact 7.46 hectares;

Support	Not applicable
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Minor Modifications suggested following Proposed Submission consultation and implications for Sustainability Appraisal

51. In order to be consistent with other references to Addenbrooke’s Hospital throughout the plan, a minor modification is suggested to Site M15. This change is in the Addendum to the Cambridge Local Plan 2014: Proposed Submission document marked as PM/B/008 and reads:

“Cambridge Biomedical Campus (including Addenbrooke’s Hospital)”

52. Following consideration of the impact of this change on the Sustainability Appraisal Framework, it has been concluded that this change does not materially alter the findings of the Sustainability Appraisal.

Site E4: Church End Industrial Estate, Rosemary Lane

Key issues raised during Issues and Options 2 (2013) consultation

Site Number: E4		
Location: Church End Industrial Estate		
Total representations: 10		
Object: 5	Support: 3	Comment: 2
Key Issues ARISING FROM CONSULTATION		
Objections	<ul style="list-style-type: none"> • Need new sites to create further capacity for employment • Housing would be good alongside employment sites if managed well • Object to any loss of employment for housing • Adverse impact on amenity of residents • Existing anti social hours of operation • Already traffic problems • Need improved cycling infrastructure and opportunities for walking and public transport 	
Support	<ul style="list-style-type: none"> • Support this option • Opportunities for intensification and upgrading • Provide community facilities 	
Comment	<ul style="list-style-type: none"> • Consider Rosemary Branch PH in planning the future of the area – potentially an important amenity • Access off Rosemary Lane and Church Lane should be achievable 	
ANALYSIS OF KEY ISSUES AND OFFICER RESPONSE		
Representations: total 10; object 5; support 3; comment 2. Objections outnumber support.		
Key issues are:		
i. Adverse impact of operations in the area, which is already a problem		

<ul style="list-style-type: none"> a. Redevelopment can [provide an opportunity to introduce modern buildings that have less impact on nearby residences ii. Need to consider community facilities <ul style="list-style-type: none"> a. Not appropriate within the employment allocation; needs may be addresses with other potential developments in the area iii. Traffic and access <ul style="list-style-type: none"> a. The County Council raises no highway objections and says access off Rosemary Lane and Church Lane should be achievable <p>The consultation has raised issues about the existing and future operations in the area and the need for community facilities. Other issues were identified in the Issues and Options 2 Part 2 report.</p>

Green – No significant planning objections to the allocation (The site to be allocated as defined in Issues and Options 2, but with boundary redrawn to remove a residential planning permission

Key Issues raised during Proposed Submission consultation

Site E4: Church End Industrial Estate, Rosemary Lane	
Total Representations: 2	
Object: 1	Support: 1
Objections	<ul style="list-style-type: none"> • Object to further development in Cherry Hinton on basis of transport impacts.
Support	<ul style="list-style-type: none"> • Support enhancement of local employment opportunities.

Minor Modifications suggested following Proposed Submission consultation and implications for Sustainability Appraisal

53. No changes to Site E4: Church End Industrial Estate, Rosemary Lane are suggested in the Addendum to the Cambridge Local Plan 2014: Proposed Submission document. There are therefore no impacts on the findings of the Sustainability Appraisal.

Site E5: 1 and 7- 11 Hills Road

Key issues raised during Issues and Options 2 (2013) consultation

Site Number: E5		
Location: 1 & 7-11 Hills Road		
Total representations: 10		
Object: 2	Support: 4	Comment: 4
Key Issues ARISING FROM CONSULTATION		
Objections	<ul style="list-style-type: none"> • Need new sites to create further capacity for employment • Adverse traffic impacts at very busy junction • Extra traffic in Newtown Conservation Area 	
Support	<ul style="list-style-type: none"> • Support this option • High quality office development 	

	<ul style="list-style-type: none"> • Quality design is essential • Improve the Catholic junction, especially for cyclists
Comment	<ul style="list-style-type: none"> • Suitable for student residential accommodation, either stand alone or part of mixed use scheme • Retain No 7 Hills Road and street trees • Need to discuss the transport strategy and assessment • Require minimal impact on the Ring Road and Hills Road/Lensfield Road Junction

ANALYSIS OF KEY ISSUES AND OFFICER RESPONSE

Representations: total 10; object 2; support 4; comment 4. Support and comments outnumber objections.

Key issues are:

- i. Good design and conservation at important site
 - a. This can be addressed through planning and design
- ii. Traffic and access
 - a. The County Council raises no overriding highway objections, but needs to discuss the transport strategy and assessment and require minimal impact on the Ring Road and Hills Road/Lensfield Road Junction. Junction improvements have been proposed

The consultation raised the significant traffic and access issues in addition to the matters identified in the Issues and Options 2 Part 2 report.

Amber – Significant planning concerns expressed, but can be addressed (The site to be allocated as defined in Issues and Options 2.)

Key Issues raised during Proposed Submission consultation

Site E5: 1 and 7- 11 Hills Road	
Total Representations: 2	
Object: 2	Support: 0
Objections	<ul style="list-style-type: none"> • The site should include buildings at 1 – 4 Gonville Place between the site and the Gonville Hotel to increase the potential of the site in both capacity and design opportunity; • Site allocation E5 should be extended to encompass the properties owned by Cambridge Assessment at 1-4 Hills Road and at 13 Harvey Road (Drosier House); • The use allocation should be changed to mixed residential and employment.
Support	Not applicable

Minor Modifications suggested following Proposed Submission consultation and implications for Sustainability Appraisal

54. No changes to Site E5: 1 and 7- 11 Hills Road are suggested in the Addendum to the Cambridge Local Plan 2014: Proposed Submission document. There are therefore no impacts on the findings of the Sustainability Appraisal.

Site GB3 & GB4: Fulbourn Road, west 1 and 2

Key issues raised during Issues and Options 2 (2013) consultation

55. The key issues from Issues and Options 2: Part 1 consultation relating to this site can be found in Appendix 5 of the Statement of Consultation.

Key Issues raised during Proposed Submission consultation

Site GB3 & GB4: Fulbourn Road, west 1 and 2	
Total Representations: 19 (including a petition signed by 2,025 people)	
Object: 16 (including a petition signed by 2,025 people)	Support: 3
Objections	<ul style="list-style-type: none"> • Petition signed by 2,025 people opposing the further destruction of the Cambridge Green Belt on the basis of: <ul style="list-style-type: none"> ○ lack of exceptional circumstances to justify release of Green Belt land; ○ urban sprawl impacting on the historic and compact character of the city, its surrounding villages and countryside and impact on traffic congestion; ○ plans being based on out-of-date growth forecasts and first consideration should be given to greater re-use of existing sites not in the Green Belt. • Commercial Estates Group objected to the site allocation on the basis of: <ul style="list-style-type: none"> ○ Insufficient evidence to demonstrate the deliverability and density of a number of allocated sites; ○ Insufficient release of land to deliver housing and employment development to meet objectively assessed needs; ○ Plans rely on infrastructure of high cost and uncertain delivery; ○ Plans do not promote sustainable transport; ○ Spatial distribution of development undermines the economic competitiveness of Cambridge; ○ Need for a joint plan for Cambridge and South Cambridgeshire to deliver growth; ○ Incorrect application of national Green Belt policy and flawed methodology for analysis of landscape value; ○ Flawed sustainability appraisal of the plans; ○ Need for greater land release from the Green Belt in both Cambridge and South Cambridgeshire to deliver between 3,300 and 4,400 homes and 10 hectares of employment land within the plan period. • Teversham Parish Council objected to the site allocation on the basis of development of GB sites (3,4, and 5) raises concerns regarding:

	<ul style="list-style-type: none"> ○ lack of local cycling facilities; ○ the dangerous nature of local road junctions for cyclists and pedestrians alike; ○ traffic congestion on already busy and narrow roads; ○ the visual effect on the Gogs and local nature reserves; and ○ the poor location to local services. ● Impact on residential properties on the neighbouring streets Tweeddale and Ainsdale, in terms of noise, dust, loss of views and reduction in property value; ● Loss of views; ● Impact on landscape character; ● Impact on highway safety on the neighbouring streets Tweeddale and Ainsdale; ● Impact on biodiversity; ● Impact on the Green Belt; ● Failure to comply with the need for exceptional circumstances to release Green Belt land; ● Impact on inadequate local infrastructure; ● Impact on flood risk; ● Impact on local roads which are already congested; ● Impact on the Cherry Hinton Pit SSSI; this may need a buffer zone to stop the chalk grassland insects such as the rare Chalk Carpet Moth moving from the SSSI to the new development, attracted by artificial lights; ● Usage should be limited to research and development and/or office accommodation, restricted to two storey buildings to limit any visual impact, noise pollution on the adjacent housing, green belt countryside and the nature reserve.
Support	<ul style="list-style-type: none"> ● General support; ● ARM Holdings plc. supports the proposed release of Green Belt sites GB3 and GB4, Fulbourn Road, west 1 and 2 for employment development. ● Support on basis that visual impact on the local area will be minimised.

Minor Modifications suggested following Proposed Submission consultation and implications for Sustainability Appraisal

56. No changes to Site GB3 and GB4: Fulbourn Road, west 1 and 2 are suggested in the Addendum to the Cambridge Local Plan 2014: Proposed Submission document. There are therefore no impacts on the findings of the Sustainability Appraisal.

Site U1: Old Press/Mill Lane

Key issues raised during Issues and Options 2 (2013) consultation

Site Number: U1		
Location: Old Press/Mill Lane		
Total representations: 19		
Object: 1	Support: 8	Comment: 10
Key Issues ARISING FROM CONSULTATION		
Objections	<ul style="list-style-type: none"> Retain and reuse all Listed Buildings and buildings of local interest 	
Support	<ul style="list-style-type: none"> Wholly appropriate - retain high quality riverside character Critical historic site with opportunity for major redesigned high quality design Support development; proposals to come forward in 2014 Increase public access to the river Improve Mill Lane/Pembroke Street Street/Trumpington Street/Silver Street junction, with priority for pedestrians and cyclists 	
Comment	<ul style="list-style-type: none"> Good opportunity to sort out underpinning issues SPD needs to be reviewed Needs comprehensive approach Support mixed use as at Miller's Yard Clarify mix of uses Suitable for student accommodation, either stand alone or as mixed use Retain two pubs Take into account the character and surroundings of St Mary the Less Clarify pros and cons of heating network No access from Little St Mary's Lane County will need to be involved in transport strategy 	
ANALYSIS OF KEY ISSUES AND OFFICER RESPONSE		
<p>Representations: total 19; object 1; support 8; comment 10. Good support and positive comments for this proposal.</p> <p>Key issues are:</p> <ol style="list-style-type: none"> i. Need for development to take advantage of opportunities offered by the site and respect the heritage environment <ol style="list-style-type: none"> a. This can be addressed through planning and design ii. Potential for mixed use <ol style="list-style-type: none"> a. This can be addressed through planning and design iii. Traffic and access, especially at Trumpington Street junctions <ol style="list-style-type: none"> a. This can be addressed through planning and an appropriate transport strategy <p>The consultation has raised no issues not identified in the Issues and Options 2 Part</p>		

2 report. Mention that the allocation is carried forward from the existing Local Plan & the Old Press Mill Lane SPD sets out key principles for the redevelopment of the area.

Green – No significant planning objections to the allocation (The site to be allocated as defined in Issues and Options 2.)

Key Issues raised during Proposed Submission consultation

Site U1: Old Press/Mill Lane	
Total Representations: 2	
Object: 2	Support: 0
Objections	<ul style="list-style-type: none"> Proposals would spoil whole area; Impact on Little St Mary's Lane must be mitigated.
Support	Not applicable

Minor Modifications suggested following Proposed Submission consultation and implications for Sustainability Appraisal

57. No changes to Site U1: Old Press/Mill Lane are suggested in the Addendum to the Cambridge Local Plan 2014: Proposed Submission document. There are therefore no impacts on the findings of the Sustainability Appraisal.

Site U2: New Museums, Downing Street

Key issues raised during Issues and Options 2 (2013) consultation

Site Number: U2		
Location: New Museums		
Total representations: 15		
Object: 2	Support: 5	Comment: 8
Key Issues ARISING FROM CONSULTATION		
Objections	<ul style="list-style-type: none"> Retain heritage assets and improve townscape 	
Support	<ul style="list-style-type: none"> Wholly appropriate for University development Needs master plan/comprehensive approach Support inclusion in the Local Plan Incorporate Corn Exchange into redevelopment – ideal for proper concert hall Critical historic site with major opportunity for redesign Pedestrian access between site and Grand Arcade Address very poor cycle parking 	
Comment	<ul style="list-style-type: none"> Opportunity to sort out underpinning issues Retain and improve Corn Exchange Protect heritage assets of the area No damage to the façade of Free School Lane No further masking of the skyline 	

	<ul style="list-style-type: none"> • Better access to museum and improve public realm • County will need to be involved in transport strategy
ANALYSIS OF KEY ISSUES AND OFFICER RESPONSE	
<p>Representations: total 15; object 1; support 5; comment 8. Good support and positive comments for this proposal.</p> <p>Key issues are:</p> <ol style="list-style-type: none"> Need for development to take advantage of opportunities offered by the site and respect the heritage environment <ol style="list-style-type: none"> This can be addressed through planning and design The future of the Corn Exchange <ol style="list-style-type: none"> There are no plans to change the Corn Exchange Wider access to the site and cycle parking <ol style="list-style-type: none"> This can be addressed through planning and design <p>With the exception of the future of the Corn Exchange, the consultation has raised no issues not identified in the Issues and Options 2 Part 2 report.</p>	
Green – No significant planning objections to the allocation (The site to be allocated as defined in Issues and Options 2.)	

Key Issues raised during Proposed Submission consultation

Site U2: New Museums, Downing Street	
Total Representations: 1	
Object: 1	Support: 0
Objections	<ul style="list-style-type: none"> • The site was identified in the last local plan and has not come forward. If it is carried forward it should, in our view, be on the basis that the scope for sensitive development is identified, and that this does not harm the heritage assets on the site.
Support	Not applicable

Minor Modifications suggested following Proposed Submission consultation and implications for Sustainability Appraisal

58. No changes to Site U2: New Museums, Downing Street are suggested in the Addendum to the Cambridge Local Plan 2014: Proposed Submission document. There are therefore no impacts on the findings of the Sustainability Appraisal.

Site U3: Grange Farm off Wilberforce Road

Key issues raised during Issues and Options 2 (2013) consultation

Site Number: U3		
Location: Grange Farm off Wilberforce Road		
Total representations: 1		
Object: 1	Support: 1	Comment: 0
Key Issues ARISING FROM CONSULTATION		
Objections	<ul style="list-style-type: none"> The site remains suitable for development as issues of access, highway capacity and surface water drainage can be overcome. 	
Support	<ul style="list-style-type: none"> 	
Comment	<ul style="list-style-type: none"> None 	
ANALYSIS OF KEY ISSUES AND OFFICER RESPONSE		
<p>Representations: total 2; object 1; support 1; comment 0. Mixed and low number of representations.</p> <p>Key issues are:</p> <ol style="list-style-type: none"> i. Access to the site <ol style="list-style-type: none"> a. This can be addressed as the land to be used to access the site is in the ownership of the developers ii. Highway capacity <ol style="list-style-type: none"> b. Concerns addressed through representations iii. Surface water drainage <ol style="list-style-type: none"> c. Demonstrated that it is likely to be capable of mitigation iv. Integration with surrounding community <ol style="list-style-type: none"> d. As the site is located within an entirely University setting, it would not be appropriate to include market housing on the site. <p>The representations have addressed the main issues of concern which previously led to this site being rejected, therefore it is now considered suitable for student housing.</p>		
Green – No significant planning objections to the allocation as student units.		

Key Issues raised during Proposed Submission consultation

Site U3: Grange Farm off Wilberforce Road		
Total Representations: 6		
Object: 6	Support: 0	
Objections	<ul style="list-style-type: none"> Landowner wishes allocation to be amended to include “120 student units or other university related accommodation subject to detailed proposals”; Site should be removed from plan; Thorough survey of ecology must be undertaken due to its sensitivity in terms of the site itself and for the setting of the city; 	

	<ul style="list-style-type: none"> • Site is part of the green corridor running into Cambridge from the West and allocation would damage this corridor within the Green Belt and its biodiversity; • Development would lead to the loss of old orchards; • Site is crossed by a Roman road; • Development would damage views into the city; • Development would increase risk of local flooding.
Support	Not applicable

Minor Modifications suggested following Proposed Submission consultation and implications for Sustainability Appraisal

59. No changes to Site U3: Grange Farm off Wilberforce Road are suggested in the Addendum to the Cambridge Local Plan 2014: Proposed Submission document. There are therefore no impacts on the findings of the Sustainability Appraisal.

Site RM1: Fen Road

Key issues raised during Issues and Options 2 (2013) consultation:

Site Number: RM1		
Total representations: 10		
Location: Fen Road		
Object: 5	Support: 3	Comment: 2
Key Issues ARISING FROM CONSULTATION		
Objections	<ul style="list-style-type: none"> • Should remain as green space • Better sited further north adjacent to A14 • Wrong to relocate problems off to the edge of the City – illegal mooring should be tackled by other means • Site may not be big enough to allow boats to turn within it • No mains sewerage connection • Site means emerging boats would block rowing and racing • Access problems by land and water formidable • Problems of access along Fen Road 	
Support	<ul style="list-style-type: none"> • Location reasonable with good connections • Provided Riverside mooring are vacated 	
Comment	<ul style="list-style-type: none"> • Should be coordinated with CF1 site proposals for mooring by South Cambs • Consider as part of master plan for Northern Fringe East • Consider as part of strategy for River Cam corridor • How would these affect Haling Way and what access would be provided? • Will this affect uncontrolled moorings on the main river? • Combine with opportunities to improve walking and cycling 	

	<ul style="list-style-type: none"> • Designate White House as heritage asset • No increase in navigational charges
ANALYSIS OF KEY ISSUES AND OFFICER RESPONSE	
<p>Representations: total 10; object 3; support 3; comment 2.</p> <p>Key issues are:</p> <ul style="list-style-type: none"> i. Strategic location in relation to river <ul style="list-style-type: none"> a. The location is appropriate in relation tot the wider heeds of the river, including reducing congestion and conflicts in the most heavily used stretches. ii. Relationship to South Cambs site <ul style="list-style-type: none"> a. Site is same ownership give an opportunity for an integrated approach iii. Impact on river use <ul style="list-style-type: none"> a. Off river moorings would help to reduce congestion and conflict and has the potential to assist in managing on-river mooring in the closer in to the City iv. Traffic and access <ul style="list-style-type: none"> a. The County Council has raided no objections on access issues <p>The consultation has raised two issues not identified in the Issues and Options 2 Part 2 report: potential adverse impacts on the river; and the need to coordinate with South Cambs</p> <p>Green – No significant planning objections to the allocation</p>	

Key Issues raised during Proposed Submission consultation

Site RM1: Fen Road	
Total Representations: 4	
Object: 2	
Support: 2	
Objections	<ul style="list-style-type: none"> • The site is located on the outskirts of Cambridge and near a caravan site and is not suitable for use of mooring which can contribute to and benefit from proximity to town centres; • The site should provide for residential use; • Site may not be achievable; • Site must have mains services with electricity supply to individual vessels.
Support	<ul style="list-style-type: none"> • General support.

Minor Modifications suggested following Proposed Submission consultation and implications for Sustainability Appraisal

60. No changes to Site RM1: Fen Road are suggested in the Addendum to the Cambridge Local Plan 2014: Proposed Submission document. There are therefore no impacts on the findings of the Sustainability Appraisal.

AUDIT TRAIL: APPENDIX C: DESIGNATIONS SCHEDULE

- Appendix C: Designations Schedule within the Cambridge Local Plan 2014: Proposed Submission document was drawn together for the Proposed Submission consultation. This appendix does not contain any policies, but is directly related to the designation of land under a range of policies and legislation. As representations could be made to this section during the Proposed Submission consultation, key issues arising from consultation and any proposed minor modifications are included below for completeness.

Key Issues raised during Proposed Submission consultation

Appendix C: Designations Schedule (Representations submitted to Appendix C in general)	
Total Representations: 8	
Object: 7	Support: 1
Objections	<ul style="list-style-type: none"> All designated heritage assets should be listed together so that it is clear that policy 61 applies to them; The Parks and Gardens of Special Historic Interest on the English Heritage Register should be drawn out of the open spaces list and identified separately to ensure their significance as heritage assets is understood, and policy 61 applied; The five scheduled monuments in the city should be listed. These are: Chesterton Abbey tower, Old Cheddars Lane Pumping Station, Hobson's Conduit, Castle Mound and Civil war earthworks (2 SAMs); Listed buildings are excluded. Should include a reference in the plan to them for completeness and balance, and to ensure that they are given appropriate prominence and weight. A sentence directing users of the plan to listed building descriptions online could cover this; All statutorily designated heritage assets should be distinguished from those that are not statutorily designated so that users of the plan understand the weight that should be accorded to the asset; Provide a list and map of the commons within Cambridge with ownership details.
Support	<ul style="list-style-type: none"> Support for the protection of play space listed.

Appendix C – Conservation Areas	
Total Representations: 1	
Object: 1	Support: 0
Objections	<ul style="list-style-type: none"> North Newtown is a conservation area, however, it is not listed.
Support	Not applicable

Appendix C – County Wildlife Site	
Total Representations: 1	
Object: 0	Support: 1
	Not applicable
Support	<ul style="list-style-type: none"> • Designation No. 15 – Worts’ Causeway Roadside Verge.

Appendix C – City Wildlife Sites	
Total Representations: 10	
Object: 1	Support: 9
Objections	<ul style="list-style-type: none"> • Designation No. 23 - Hedgerow West of Babraham Road - Development of GB1 Land north of Worts’ Causeway and GB2 Land south of Worts’ Causeway will have an impact on hedgerows from human habitation.
Support	<ul style="list-style-type: none"> • Designation: <ul style="list-style-type: none"> ○ No. 01 - Adams Road Sanctuary ○ No. 11 - Cherry Hinton Brook ○ No. 17 - Coldham's Lane Old Landfill Sites ○ No. 18 - CU Officer Training Corps Pit ○ No. 40 - Norman Cement Pits ○ No. 48 - The Spinney and Hayster Open Space

Appendix C – Neighbourhood, District and Local Centres	
Total Representations: 7	
Object: 6	Support: 1
Objections	<ul style="list-style-type: none"> • Designation No. 14 – Trumpington Local Centre – Object to the expansion of Local Centre as: there is no evidence to support it; the expansion mainly includes non-retail uses falling outside the definition of local centre uses; the expansion relates poorly to the existing centre boundary; and the elongation of the local centre boundary will have an adverse impact upon the unique character of the existing local centre which comprises a crescent of shops located around a green area; • Designation No. 06 – Mitcham’s Corner District Centre – Amend the centre boundary to some exclude land fronting Milton Road (see rep 27491). The provision of retail on the Victoria Road plan is questionable, due parking and servicing issues. The Portland Arms provides a natural stop to the commercial uses on the west side of Milton Road, and the District Centre boundary should be amended accordingly; • Designation No. 04 Mill Road East District Centre and 05 Mill Road West District Centre – Mill Road East and West should be one district centre not two; • Designation No. 11 Hills Road Local Centre – Either the Hills Road centre should be upgraded to a District Centre to be afforded the percentage protection, or this area to be given a specific 55% or 60% percentage in A1 use protection;

	<ul style="list-style-type: none"> • Designation No. 04 Mill Road East District Centre – Delete the designation west of the junction of Ross Street and Romsey Terrace.
Support	<ul style="list-style-type: none"> • Designation No. 03 – Histon Road District Centre.

Appendix C – Protected Open Space	
Total Representations: 194	
Object: 167	Support: 27
Objections	<ul style="list-style-type: none"> • Lack of reference to amenities (including all weather meeting places) for young people; • Designation P&G20 - St. Matthew's Piece: No further loss of Protected Open Space in Petersfield. Either return the half of St Matthew's Piece on which the Howard Mallett Centre stands to green space, or to preserve the centre as a genuine community base, surrounded by green space; • Return the Howard Mallett Centre to green space and re-locate the facility nearby to at least its existing scale, range, and quality for this area; • Local Plan will not alleviate acute shortage of Protected Open Space in Petersfield; • Designation A26 - Peverel Road Allotments - An alteration is required to allocate the site for B1 purposes; • Retain designation AGS05 - Donkey Common - as a protected green space and remove from the Opportunity Area; • Retain designation AGS12 - Peter's Field - as a protected green space and remove from the Opportunity Area; • Designation AGS60 - Westminster College - is based upon an inaccurate assessment of the recreational and environmental importance of the site; • Designation AGS62 - The Pightle and Principal's Lodge - will be highly restrictive to the development aspirations of Newnham College; • Designation NAT19 - Meadow Triangle near Wilberforce Road and Cycle Way - serves no Green Belt purpose or open space purpose; • Designation P&G17 - Bell School of Language - is incorrect and boundary illogical as the evaluation has not been based upon an assessment of need, as is required for access to recreational facilities; • Designation P&G22 - Coldham's Common - is not a Park and Garden, but an unenclosed common; • Designation P&G29 - Magdalene College Grounds - is based upon an inaccurate assessment of the recreational and environmental importance of the site; • Designation P&G37 - Ridley Hall Grounds - should be amended to simply identify the central lawned area of the quad;

	<ul style="list-style-type: none"> • Designation P&G38 - Gonville and Caius Fellows Garden - is already protected within the Central Conservation Area designation and does not justify further protection; • Designation P&G40 - Newnham College Gardens - will restrict the development aspirations of Newnham College; • Designation P&G51 - Anstey Hall - the site assessment is factually incorrect; • Designation SPO06 - Cambridge Tennis and Hockey Club – the site should be allocated for residential development; • Designation SPO16 - Emmanuel College Playing Field - the site should be allocated for residential development; • Designation SPO33 - Newnham College Playing Field - will restrict the development aspirations of Newnham College; • Designation SPO37 - Perse School For Boys Playing Field - Potential expansion of local schools should be seen as an opportunity to enhance the quality of the provision; • Designation SPO62 - Perse Preparatory School – Potential expansion of local schools should be seen as an opportunity to enhance the quality of the provision.
Support	<ul style="list-style-type: none"> • Designation of: <ul style="list-style-type: none"> ○ AGS85 - Centre for Mathematical Sciences; ○ NAT19 - Meadow Triangle near Wilberforce Road and Cycle Way; ○ P&G08 - Histon Road Recreation Ground; ○ P&G27 - Cambridge University Botanic Garden; ○ SPO02 – Cambridge City Football Club; ○ SPO06 - Cambridge Tennis and Hockey Club; ○ SPO16 - Emmanuel College Playing Field; ○ SPO19 - Fitzwilliam College Playing Fields; ○ SPO50 - Trinity College Playing Field; ○ SPO52 - University Athletics Track.

Appendix C – List of Protected Pubs	
Total Representations: 3	
Object: 1	Support: 2
Objections	<ul style="list-style-type: none"> • Until development actually occurs, the Greyhound (Coldham’s Lane), the Dog & Pheasant (Chesterton High Street) and the Osborne Arms (Hills Road) should remain on the safeguarded list.
Support	<ul style="list-style-type: none"> • The Alma is a local centre; • Protect the Penny Ferry building and site.

Minor Modifications suggested following Proposed Submission consultation and implications for Sustainability Appraisal

2. Three minor modifications to Appendix C: Designations Schedule are suggested in the Addendum to the Cambridge Local Plan 2014: Proposed Submission document marked as PM/C/001, PM/C/002 and PM/C/003.
3. PM/C/001 suggests that a new paragraph C.1 is included at the beginning of the appendix for clarity. This paragraph reads:

“The schedules as listed below are all shown on the Policies Map, except for the List of Protected Public Houses. Other important schedules relevant to planning include listed buildings, scheduled monuments, registered parks and gardens. The maintenance of these schedules is not within the council’s responsibility, but they can be found by contacting English Heritage.”
4. Within the Protected Open Space list in Appendix C, PM/C/002 suggests that SPO59 Cantabrigian Rugby Football Grounds are renamed as SPO59 Hills Road Sixth Form College Playing Fields/Cantabrigian Rugby Football Grounds to better reflect ownership and use of the site.
5. Within the List of Protected Public Houses in Appendix C, PM/C/003 suggests that reference to PH009 The Ranch is deleted as the public house has been demolished and planning permission has been granted for student residential development.
6. Following consideration of the impact of these changes on the Sustainability Appraisal Framework, it has been concluded that these changes do not materially alter the findings of the Sustainability Appraisal.

AUDIT TRAIL: APPENDIX D: SOUTHERN FRINGE AREA DEVELOPMENT FRAMEWORK

- Appendix D: Southern Fringe Area Development Framework within the Cambridge Local Plan 2014: Proposed Submission document was based on the Southern Fringe Area Development Framework (ADF) document produced by Cambridge City Council in 2006 and was abridged and updated for the Proposed Submission consultation. This appendix does not contain any policies, but is related to Policy 17: Southern Fringe Areas of Major Change in the plan. Whilst the appendix has not had an audit trail before this stage of plan-making, reference should be made to the audit trail for Policy 17 in Section Three: City Centre, areas of major change, opportunity areas and site specific proposals for further information. As representations could be made to this section during the Proposed Submission consultation, key issues arising from consultation and any proposed minor modifications are included below for completeness.

Key Issues raised during Proposed Submission consultation

Appendix D: Southern Fringe Area Development Framework	
Total Representations: 7	
Object: 5	Support: 2
Objections	<ul style="list-style-type: none"> Appendix D needs to be significantly updated in the light of planning permissions secured, planning obligations requirements entered into and developments implemented; English Heritage is concerned about the possibility for discordant and monumental building heights in the Southern Fringe. Figure D.2, page 295 suggests that landmark buildings are possible; Cambridgeshire County Council has objected on the basis that the blanket approach to the provision of a Household Recycling Centre in the Southern Fringe in the final sentence of section D.40 is unhelpful and should be deleted; Paragraph D.10 needs to have pointed out that due to the nature of hospital users that Blue Badge parking should amount to at least 15% of the spaces; Para D.21 should read: "Development of the Cambridge Southern Fringe should contribute toward the regional network of public rights of way for vulnerable traffic (walkers, cyclists, horse riders, disabled people and carriage drivers). This will enable better access to the countryside, encourage healthier lifestyles and more sustainable choices of travel between settlements and sites of interest, and ultimately help strengthen the rural economy"; Para D.28 should read: "In terms of creating a more sustainable form of development and minimising car trips, it is essential that walking and cycling are seen as viable alternatives to the car. It

	must however be accepted that car trips will make up a significant proportion of journeys, particularly to the primary health care centre, so vehicle access and Blue Badge parking will be a major requirement.”
Support	<ul style="list-style-type: none"> • Support for the inclusion of the Southern Fringe Area Development Framework in the local plan; • Support for the community facilities to be provided; • Support for the recognition that there is nowhere suitable for a Household Recycling Centre in the Southern Fringe.

Minor Modifications suggested following Proposed Submission consultation and implications for Sustainability Appraisal

2. As a result of representations (Representation Numbers 27616, 27429 and 26785) made during the Proposed Submission consultation, a minor modification to the first component of paragraph D.1 in Appendix D is suggested in the interests of clarity. This change is in the Addendum to the Cambridge Local Plan 2014: Proposed Submission document marked as PM/D/001 and reads:

“This appendix is based on the Southern Fringe Area Development Framework (ADF) document produced by Cambridge City Council in 2006. The wording of this appendix is predominantly based on the 2006 document, but updated slightly where it is appropriate to do so. It has been included in the local plan to reiterate the council's support for the Framework's content (as updated) and to ensure its status is strengthened by virtue of it being included in a local plan. This appendix will help direct the preparation of future planning applications and the planning of services and infrastructure. The vision for this area is:”

3. The change to Appendix D: Southern Fringe Area Development Framework suggested in the Addendum to the Cambridge Local Plan 2014: Proposed Submission document is not considered to impact on the findings of the Sustainability Appraisal.

AUDIT TRAIL: APPENDIX E: ROOF EXTENSIONS DESIGN GUIDE

1. Appendix E: Roof Extensions Design Guide within the Cambridge Local Plan 2014: Proposed Submission document was drawn together for the Proposed Submission consultation. This appendix does not contain any policies, but is directly related to and referred to within Policy 58: Altering and extending existing buildings. Whilst the appendix has not had an audit trail before this stage of plan-making, reference should be made to the audit trail for Policy 58 in Section Seven: Protecting and enhancing the character of Cambridge for further information. As representations could be made to this section during the Proposed Submission consultation, key issues arising from consultation and any proposed minor modifications are included below for completeness.

Key Issues raised during Proposed Submission consultation

Appendix E: Roof Extensions design guide	
Total Representations: 0	
Object: 0	Support: 0
Objections	Not applicable
Support	Not applicable

Minor Modifications suggested following Proposed Submission consultation and implications for Sustainability Appraisal

2. No changes to Appendix E: Roof Extensions Design Guide are suggested in the Addendum to the Cambridge Local Plan 2014: Proposed Submission document. There are therefore no impacts on the findings of the Sustainability Appraisal.

AUDIT TRAIL: APPENDIX F: TALL BUILDINGS AND THE SKYLINE

- Appendix F: Tall buildings and the skyline within the Cambridge Local Plan 2014: Proposed Submission document was drawn together for the Proposed Submission consultation. This appendix does not contain any policies, but is related to Policy 60: Tall buildings and the skyline in Cambridge in the plan. Whilst the appendix has not had an audit trail before this stage of plan-making, reference should be made to the audit trail for Policy 60 in Section Seven: Protecting and enhancing the character of Cambridge for further information. As representations could be made to this section during the Proposed Submission consultation, key issues arising from consultation and any proposed minor modifications are included below for completeness.

Key Issues raised during Proposed Submission consultation

Appendix F: Tall Buildings and the Skyline	
Total Representations: 8	
Object: 8	Support: 0
Objections	<ul style="list-style-type: none"> Paragraph F.4 is ambiguous; Paragraph F.10 - The requirement for all development over 19m in the historic core and 13m elsewhere to be assessed against criteria is too onerous and too prescriptive and should be deleted Paragraph F.13 makes reference Figure F.1 which in turn identifies existing landmark buildings on Cambridge. While all these are prominent buildings and most are positive, English Heritage would question whether the Varsity Hotel has enhanced the Cambridge skyline, particularly in views from Jesus Common. Paragraph F.20 d. - Object to the omission from F20 d. of the views from the Coton footpath and from the M11 and of Coton Country Park of the spires and towers of the historic core. These views are as significant if not more so than the other views referred to from the west; Paragraph F.29 - All floors of tall buildings should be served by Part M Building Regulations lifts; Request that the guidance is reviewed including criteria 1 (location), 2 (historic impact), 4 (Amenity) and 5 (public realm); Paragraph F.31 - notes the potential of tall buildings to act as positive landmarks that aid legibility. Whilst that may be true, the role is not exclusive to tall buildings, and other lower structures can be equally helpful in aiding route-finding through the city; Criterion 2 - It would be helpful for this section to give reference the requirements for the protection of the setting of designated heritage assets as set out in the NPPF; Paragraph F.41 should have reference to the public realm added after 'gardens' when considering loss of daylight and sunlight due to a proposed tall building;

	<ul style="list-style-type: none"> • Paragraph F.46 - When considering the public realm around tall buildings, in addition to the points made, they should also be sunny and protected from the effects of wind funnelled by the adjacent buildings; • The October 2011 draft of the Tall Buildings Guidance included the statement that tall buildings within the Historic Core area are unlikely to be supported in order to ensure the historic integrity of the centre is maintained. That statement is missing from the current policy and English Heritage recommend that it is reinstated.
Support	Not applicable.

Minor Modifications suggested following Proposed Submission consultation and implications for Sustainability Appraisal

2. As a result of a representation (Representation Number 27598) made during the Proposed Submission consultation, a minor modification to paragraph F.41 in Appendix F is suggested in the interests of clarity. This change is in the Addendum to the Cambridge Local Plan 2014: Proposed Submission document marked as PM/F/001 and reads:

“Tall buildings should be good neighbours. Careful consideration must be given to the design of any new tall building to ensure neighbouring properties are not adversely affected due to the loss of aspect, outlook or privacy (overlooking), loss of daylight and sunlight to adjacent properties, overshadowing of gardens and the public realm, noise, or any other relevant amenity.”

3. The change to Appendix F: Tall buildings and the skyline suggested in the Addendum to the Cambridge Local Plan 2014: Proposed Submission document is not considered to impact on the findings of the Sustainability Appraisal.

AUDIT TRAIL: APPENDIX G: LOCAL HERITAGE ASSETS CRITERIA AND LIST

- Appendix G: Local Heritage Assets Criteria and List within the Cambridge Local Plan 2014: Proposed Submission document was drawn together for the Proposed Submission consultation. This appendix does not contain any policies, but is related to Policy 62: Local heritage assets in the plan. Whilst the appendix has not had an audit trail before this stage of plan-making, reference should be made to the audit trail for Policy 62 in Section Seven: Protecting and enhancing the character of Cambridge for further information. As representations could be made to this section during the Proposed Submission consultation, key issues arising from consultation and any proposed minor modifications are included below for completeness.

Key Issues raised during Proposed Submission consultation

Appendix G: Local Heritage Assets Criteria and List	
Total Representations: 5	
Object: 4	Support: 1
Objections	<ul style="list-style-type: none"> Appendix G should be amended to set out criteria for the designation of locally listed structures, features and gardens; The criteria within Appendix G could have the effect of providing the basis for the local listing of a significant number of buildings in the city. Such criteria are not necessary given existing controls; The process by which buildings can be 'locally listed' does not provide for rigorous and consistent designation of buildings; Criterion G.3.a is too early. The date should be 1890 or 1900; Open space between buildings should be safeguarded.
Support	<ul style="list-style-type: none"> General support.

Minor Modifications suggested following Proposed Submission consultation and implications for Sustainability Appraisal

- As a result of further checks made by officers during the Proposed Submission consultation, a number of minor modifications to the list of local heritage assets in Appendix G are suggested in the interests of completeness. These changes are in the Addendum to the Cambridge Local Plan 2014: Proposed Submission document marked as PM/G/001 and read:

“Add following sites to list as they have met the criteria for local heritage assets:

- All Souls Lane – Mortuary Chapel of All Souls;
- Buckingham Road – Blackfriars;
- Chaucer Road – No. 6, Dalberg;

- Chaucer Road – Former Coach House to No. 6;
- Cherry Hinton Road – No. 91;
- Eden Street – No. 68;
- Grange Road – Grange Court and Manor Court, Pinehurst;
- Hemingford Road – Romsey Mill;
- Market Passage – Baroosh Bar;
- Newnham Walk, Principal’s Lodge;
- Northampton Street – The Punter;
- Parkside – Parkside Community College
- St Barnabas Road – No. 61, St Barnabas Church Hall;
- St Barnabas Road – The Old School, Rear of St Barnabas Church;
- Thompson’s Lane – La Mimosa;
- Trumpington Street – Hobson Building, St Catharine’s College;
- Trumpington Street – Woodlark Building, St Catharine’s College.

Amend the names and addresses of the following sites to better reflect the location and known names of the sites:

- Downing College – Baker, and Scott Buildings and Chapel (was listed as Baker Buildings; Scott Buildings and Chapel);
- Elm Street – Nos. ~~8a~~ 1 to 8 consecutive (was listed as No. 8a);
- Emmanuel Road – Cambridge Unitarian Memorial Church (was listed as Unitarian Church)
- St Philip’s Road – No.21, Argyle Villa (was listed as No. 21 only);
- Willis Road, No. 25 Sinclair Building, Anglia Ruskin University (was listed as Sinclair Building, Anglia Ruskin University);
- Willis Road – Nos. 1 –~~23~~ 25 (odd) (was listed as Nos. 1 – 25 (odd)).

Delete following sites from list as they have met the criteria for statutory listing:

- Fraser Road – St. George’s Church;
- Jesus Lane – Wesley House;
- Mill Lane – The Graduate Centre;
- Trumpington Street – No. 70;

- Trumpington Street - Scroope Terrace.

Delete the following sites as the building has been demolished:

- Belvoir Terrace, Trumpington Road – No. 6, Vine Cottage;
- Mill Road – Nos 172 – 174;
- Parkside – Fire Station;
- Thoday Street – St Philip’s Junior School;
- West Road – No. 5.”

3. None of the changes to Appendix G: Local Heritage Assets Criteria and List suggested in the Addendum to the Cambridge Local Plan 2014: Proposed Submission document are considered to impact on the findings of the Sustainability Appraisal.

AUDIT TRAIL: APPENDIX H: SHOPFRONT DESIGN GUIDE

- Appendix H: Shopfront Design Guide within the Cambridge Local Plan 2014: Proposed Submission document was drawn together for the Proposed Submission consultation. This appendix does not contain any policies, but is directly related to and referred to within Policy 64: Shopfronts, signage and shop security measures. Whilst the appendix has not had an audit trail before this stage of plan-making, reference should be made to the audit trail for Policy 64 in Section Seven: Protecting and enhancing the character of Cambridge for further information. As representations could be made to this section during the Proposed Submission consultation, key issues arising from consultation and any proposed minor modifications are included below for completeness.

Key Issues raised during Proposed Submission consultation

Appendix H: Shopfront Design Guide	
Total Representations: 3	
Object: 2	Support: 1
Objections	<ul style="list-style-type: none"> Fails to mention the illegal stopping that inevitably occurs when cashpoints (ATMs) are added to shops directly on major arterial roads. These should be placed inside, to avoid passing traffic blocking such roads; Appendix H.4.p states that 'Key elements to good shopfront design include[s] employing a competent designer and using high quality materials and craftsmen'. This requirement should apply to ALL new developments.
Support	<ul style="list-style-type: none"> Good design guide with useful illustrations.

Minor Modifications suggested following Proposed Submission consultation and implications for Sustainability Appraisal

- No changes to Appendix H: Shopfront Design Guide are suggested in the Addendum to the Cambridge Local Plan 2014: Proposed Submission document. There are therefore no impacts on the findings of the Sustainability Appraisal.

AUDIT TRAIL: APPENDIX I: OPEN SPACE AND RECREATION STANDARDS

- Appendix I: Open Space and Recreation Standards within the Cambridge Local Plan 2014: Proposed Submission document was drawn together for the Proposed Submission consultation. This appendix does not contain any policies, but is directly related to and referred to within Policy 67: Protection of open space and Policy 68: Open space and recreation provision through new development. Whilst the appendix has not had an audit trail before this stage of plan-making, reference should be made to the audit trail for policies 67 and 68 in Section Seven: Protecting and enhancing the character of Cambridge for further information. As representations could be made to this section during the Proposed Submission consultation, key issues arising from consultation and any proposed minor modifications are included below for completeness.

Key Issues raised during Proposed Submission consultation

Appendix I: Open Space and Recreation Standards	
Total Representations: 12	
Object: 8	Support: 4
Objections	<ul style="list-style-type: none"> • Lack of reference to amenities (including all weather meeting places) for young people; • Criteria omit: <ul style="list-style-type: none"> ○ Commons neither listed nor mapped. No reference made to their importance, their ownership a legal framework that protects them; and; ○ the transport function of Protected Open Space; • Provision for disabled people must be integral; • Green Belt sites satisfy protection under Protected Open Space assessment criteria.
Support	<ul style="list-style-type: none"> • Support for the criteria listed to assessment land for protection; • Protected Open Space with potential for informal play.

Minor Modifications suggested following Proposed Submission consultation and implications for Sustainability Appraisal

- As a result of a representation (Representation Number 27229) made during the Proposed Submission consultation and the need for the local plan to be compatible with the emerging Cambridge Community Infrastructure Levy and the Community Infrastructure Levy Regulations (2010 as amended), five minor modifications to Appendix I were suggested. These changes are in the Addendum to the Cambridge Local Plan 2014: Proposed Submission document marked as PM/I/001 to PM/I/005.
- PM/I/001 suggests that paragraph I.2 is amended to read:

“Policy 68 requires that all residential developments should contribute to the ~~make provision for~~ of open space and recreation sites/sports ~~facilities in~~

~~accordance with the Council's Open Space and Recreation Standards, as set out below.~~ The council's Open Space and Recreation Strategy provides further detail on the justification for these standards and includes guidance on accessibility and quality. ~~It also includes further guidance as to when open space should be provided on site, and when it should be provided through commuted payments.~~ Table I.1 sets out the standards for different types of open space and recreation provision. They apply to all schemes for new residential developments and the requirement is based on the net number of residents accommodated in the new development."

4. PM/I/002 relates to Table I.1: Open Space and Recreation Standards, and suggests that the definition of informal open space within the second column and fifth row of the table should be amended to read:

"Informal provision, including recreation grounds, parks and, natural greenspaces and, in town centres or urban locations, usable, high quality, public hard surfaces."

In addition to deleting the sentence under Table I.1 with the asterisk, the asterisk should be removed from the fourth column, second and third rows and the footnote should be removed.

~~*If on site, a deduction from Community Infrastructure Levy liability will be made.~~

The second footnote should be amended to read:

"⁺ Subject to corporate approval of these delivery mechanisms Indicative, and subject to the adoption of the Community Infrastructure Levy and associated Regulation 123 list."

5. PM/I/003 amends paragraph I.7 to delete the last sentence:

~~"The standard is based on the existing level of provision of one outdoor bowling green for every 11,000 people. New provision should be well related in geographical terms to the population it is intended to serve. Most housing development sites within the existing built-up area of Cambridge are too small to be able to make much contribution to the provision of outdoor sports facilities on-site. Accordingly, it is likely that provision will be in the form of commuted payments."~~

6. PM/I/004 suggests the deletion of the latter part of paragraph I.8:

"The main components of formal indoor facilities are swimming pools and sports halls. The standard consists of:

- one swimming pool for every 50,000 people; and

- one sports hall for every 13,000 people.

~~The standard is based on existing and committed provision of swimming pools and sports halls. These will meet demand, but there is little spare capacity. All new developments should therefore contribute through commuted payments based on the provision of new sports halls and swimming pool."~~

7. PM/I/005 relates to paragraph I.10 and is amended as follows:

"This reflects existing provision. Provision for new allotments should be made in the existing built-up area of the city and for urban extensions. Where new residential development is brought forward in the existing built-up area of the city, it is recognised that it would be difficult to achieve full provision against the standards in a densely developed area. In the absence of sufficient land for new allotments, monies should be paid towards the enhancement of existing allotment sites. The council ~~should~~ may also seek to identify land which might be brought forward for new allotments in areas of deficiency."

8. Following consideration of the impact of these changes on the Sustainability Appraisal Framework, it has been concluded that these changes do not materially alter the findings of the Sustainability Appraisal.

AUDIT TRAIL: APPENDIX J: BIODIVERSITY

- Appendix J: Biodiversity within the Cambridge Local Plan 2014: Proposed Submission document was drawn together for the Proposed Submission consultation. This appendix does not contain any policies, but is directly related to and referred to within the supporting text for Policy 70: Protection of priority species and habitats. Whilst the appendix has not had an audit trail before this stage of plan-making, reference should be made to the audit trail for Policy 70 in Section Seven: Protecting and enhancing the character of Cambridge for further information. As representations could be made to this section during the Proposed Submission consultation, key issues arising from consultation and any proposed minor modifications are included below for completeness.

Key Issues raised during Proposed Submission consultation

Appendix J: Biodiversity	
Total Representations: 2	
Object: 2	
Support: 0	
Objections	<ul style="list-style-type: none"> Planting within development should be native species and should be beneficial for wildlife species that occur in Cambridge; A list of suitable native species should be provided.
Support	Not applicable

Minor Modifications suggested following Proposed Submission consultation and implications for Sustainability Appraisal

- No changes to Appendix J: Biodiversity are suggested in the Addendum to the Cambridge Local Plan 2014: Proposed Submission document. There are therefore no impacts on the findings of the Sustainability Appraisal.

AUDIT TRAIL: APPENDIX K: MARKETING, LOCAL NEEDS ASSESSMENT AND VIABILITY APPRAISAL

1. Appendix K: Marketing, Local Needs Assessment and Viability Appraisal within the Cambridge Local Plan 2014: Proposed Submission document was drawn together for the Proposed Submission consultation. This appendix does not contain any policies, but is directly related to and referred to within Policy 73: Community, sports and leisure facilities and Policy 76: Protection of public houses. Whilst the appendix has not had an audit trail before this stage of plan-making, reference should be made to the audit trail for Policies 73 and 76 in Section Eight: Services and Local Facilities for further information. As representations could be made to this section during the Proposed Submission consultation, key issues arising from consultation and any proposed minor modifications are included below for completeness.

Key Issues raised during Proposed Submission consultation

Appendix K: Marketing, Local Needs Assessment and Viability Appraisal	
Total Representations: 3	
Object: 2	Support: 1
Objections	<ul style="list-style-type: none"> • Simplification of marketing requirements; • Requirements are a duplication of 'Community Right to Bid' provisions;
Support	<ul style="list-style-type: none"> • Support for marketing requirements.

Minor Modifications suggested following Proposed Submission consultation and implications for Sustainability Appraisal

2. As a result of a representation (Representation Number 27480) made during the Proposed Submission consultation, a minor modification to paragraph K.8 is suggested. This change is in the Addendum to the Cambridge Local Plan 2014: Proposed Submission document marked as PM/K/001. PM/K/001 suggests that criterion (d) of paragraph K.8 reads:

“unless previously agreed in writing with the council as a local planning authority, the marketing exercise should be sufficiently thorough and use all available forms of advertising media and therefore include as a minimum:”

Sales and marketing approaches are then listed.

3. Following consideration of the impact of this change on the Sustainability Appraisal Framework, it has been concluded that this change does not materially alter the findings of the Sustainability Appraisal.

AUDIT TRAIL: APPENDIX L: CAR AND CYCLE PARKING STANDARDS

- Appendix L: Car and Cycle Parking Standards within the Cambridge Local Plan 2014: Proposed Submission document was drawn together for the Proposed Submission consultation. This appendix does not contain any policies, but is directly related to and referred to within Policy 82: Parking Management. Whilst the appendix has not had an audit trail before this stage of plan-making, reference should be made to the audit trail for Policy 82 within Section Nine: Providing the infrastructure to support development for further information. As representations could be made to this section during the Proposed Submission consultation, key issues arising from consultation and any proposed minor modifications are included below for completeness.

Key Issues raised during Proposed Submission consultation

Appendix L: Car and cycle parking requirements	
Total Representations: 6	
Object: 5	Support: 1
Objections	<ul style="list-style-type: none"> Cycle standards too onerous for Anglia Ruskin University especially when The Grafton has a bus interchange and student accommodation is close by. Cycle standard for D1 Higher education students should be amended to 1 per 3 students based on peak number of students on site at any time; Cycle standard for D1 Higher education staff should be amended for 1 in 3 members of staff; Not enough short stay parking or cycle parking is provided in new developments. Need to be more specific about levels of visitor parking; (Table L.10) Many dwellings will have more than one bike therefore provision in new development is too low; In the section on residential cycle parking, the text fails to recognise that a 1-bedroom flat could still have 2 people: standards are insufficient. Average 1.5 spaces across the development needed; Much more detail is required on the standards and design of cycle parking. Cycle parking provision must reflect the high levels of cycle use in the city and must always be more convenient than car parking (Cambridge Cycling Campaign).
Support	<ul style="list-style-type: none"> Support for the parking requirement for offices and general industry.

Minor Modifications suggested following Proposed Submission consultation and implications for Sustainability Appraisal

- As a result of a representation (Representation Number 27305) made during the Proposed Submission consultation, two minor modifications to Appendix L: Car and Cycle Parking Standards are suggested for clarity and to address a

drafting error. These changes are in the Addendum to the Cambridge Local Plan 2014: Proposed Submission document marked as PM/L/001 and PM/L/002.

3. PM/L/001 suggests that, after paragraph L.16, an additional heading 'Cycle Parking' is inserted prior to the sub-title 'Residential cycle parking standards'.
4. PM/L/002 suggests that the second bullet of paragraph L.17 point is amended to read:

“accord with the guidelines for use of high capacity or two-tier (double stacker/double decker) stands ~~(see Appendix 1)~~ (see paragraphs L.20 to L.25 for further information);”
5. Following consideration of the impact of these changes on the Sustainability Appraisal Framework, it has been concluded that these changes do not materially alter the findings of the Sustainability Appraisal.

AUDIT TRAIL: APPENDIX M: MONITORING AND IMPLEMENTATION

1. Appendix M: Monitoring and Implementation within the Cambridge Local Plan 2014: Proposed Submission document was drawn together for the Proposed Submission consultation. This appendix does not contain any policies, but relates to the monitoring of all the policies in the plan. As representations could be made to this section during the Proposed Submission consultation, key issues arising from consultation and any proposed minor modifications are included below for completeness.

Key Issues raised during Proposed Submission consultation

Appendix M: Monitoring and Implementation	
Total Representations: 3	
Object: 3	Support: 0
Objections	<ul style="list-style-type: none"> • In relation to monitoring of policy 14 in Appendix M, the risk of 'non delivery' should be expanded with an explanation, i.e. the issues of odour impact and footprint and availability of land relating to the Water Recycling Centre,(WRC), may not be overcome and therefore sensitive development in close proximity to the WRC would not go ahead; • In this Appendix for policy 76 it states that "where development has occurred on a safeguarded site that prevents return to public house use (e.g. where a public house has been demolished and replaced with residential flats) then this site would be removed from the list of safeguard sites." However, there are cases of pub sites that were listed in the Interim Planning Policy Guidance on Public Houses which have been prematurely excluded from the list of safeguarded sites in Appendix C; • Need for strong statement to the effect that the council will seek to enforce obligations given by developers.
Support	Not applicable.

Minor Modifications suggested following Proposed Submission consultation and implications for Sustainability Appraisal

2. No changes to Appendix M: Monitoring and Implementation are suggested in the Addendum to the Cambridge Local Plan 2014: Proposed Submission document. There are therefore no impacts on the findings of the Sustainability Appraisal.

AUDIT TRAIL: GLOSSARY

1. The glossary within the Cambridge Local Plan 2014: Proposed Submission document was drawn together for the Proposed Submission consultation. This does not contain any policies and is not directly related to any policies, and therefore has not had an audit trail before this stage of plan-making. However, as representations could be made to this section during the Proposed Submission consultation, key issues arising from consultation and any proposed minor modifications are included below.

Key Issues raised during Proposed Submission consultation

Glossary	
Total Representations: 2	
Object: 2	Support: 0
Objections	<ul style="list-style-type: none"> • Definitions in the glossary need to be tightened; • Definition for 'dwelling' needs to be included; • Definition for Grade II* listed building needs to be amended to refer to the percentage of Grade I and II* buildings within the overall number of listed buildings.
Support	Not applicable

Minor Modifications suggested following Proposed Submission consultation and implications for Sustainability Appraisal

2. This change is suggested in response to representations from the Environment Agency and provides clarity on the legislative context for landfill sites. This change is in the Addendum to the Cambridge Local Plan 2014: Proposed Submission document marked as PM/Glossary/001 and reads:

“Landfill sites:

Landfill sites were originally small, informal and uncontrolled tips used by local authorities or industry for the disposal of waste. As urban sites became scarcer, larger sites were developed towards the edge of towns and cities. The Report of the Working Party on Refuse Disposal (DOE 1971) defined controlled landfilling as ‘the deposit and compacting of waste on land in shallow layers, and covering the exposed surfaces with inert material.’

Prior to the 1970s, the majority of landfill sites had little or no engineering control of waste beyond that provided by the local topography and geology. However, the introduction of the Deposit of Poisonous Waste Act 1972 and Control of Pollution Act 1974 introduced regulation of landfill. Modern landfills are regulated under the Landfill Directive 1999 and the Landfill Regulations 2010.”

3. Following consideration of the impact of this change on the Sustainability Appraisal Framework, it has been concluded that this change does not materially alter the findings of the Sustainability Appraisal.

AUDIT TRAIL: POLICIES MAP

1. The Policies Map supporting the Cambridge Local Plan 2014: Proposed Submission document was drawn together for the Proposed Submission consultation. This has not therefore had an audit trail before this stage of plan-making. However, any proposed minor modifications are included below.

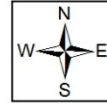
Key Issues raised during Proposed Submission consultation

Not applicable

Minor Modifications suggested following Proposed Submission consultation and implications for Sustainability Appraisal

2. All four minor modifications suggested to the Policies Map are put forward to improve clarity. These changes are in the Addendum to the Cambridge Local Plan 2014: Proposed Submission document marked as PM/Policies Map/001 to PM/Policies Map/004.
3. PM/Policies Map/001 is in response to Representation Number 27315. The Minerals and Waste Safeguarding Allocation and Area of Search is not sufficiently visible and has been amended to yellow from mid grey to make it more visible. See following Policies Map excerpts 1 -4 of 7 for information.
4. PM/Policies Map/002 is suggested in order to properly reflect the boundaries of the Brooklands Avenue Conservation Area. See following Policies Map excerpt 5 of 7 for information.
5. PM/Policies Map/003 is suggested to reflect the status of the Old Press/Mill Lane site (Site U1) as an Opportunity Area (Policy 25). See following Policies Map excerpt 6 of 7 for information.
6. PM/Policies Map/004 is suggested for clarity as the Primary and Secondary Shopping Frontages are currently difficult to identify. Primary Shopping Frontage will now be pink, whilst Secondary Shopping Frontage will now be purple. See following Policies Map excerpt 7 of 7 for amended colours of primary and secondary shopping frontage.
7. Following consideration of the impact of these changes on the Sustainability Appraisal Framework, it has been concluded that these changes do not materially alter the findings of the Sustainability Appraisal.







Policies Map - Proposed Changes: Excerpt 1 of 7



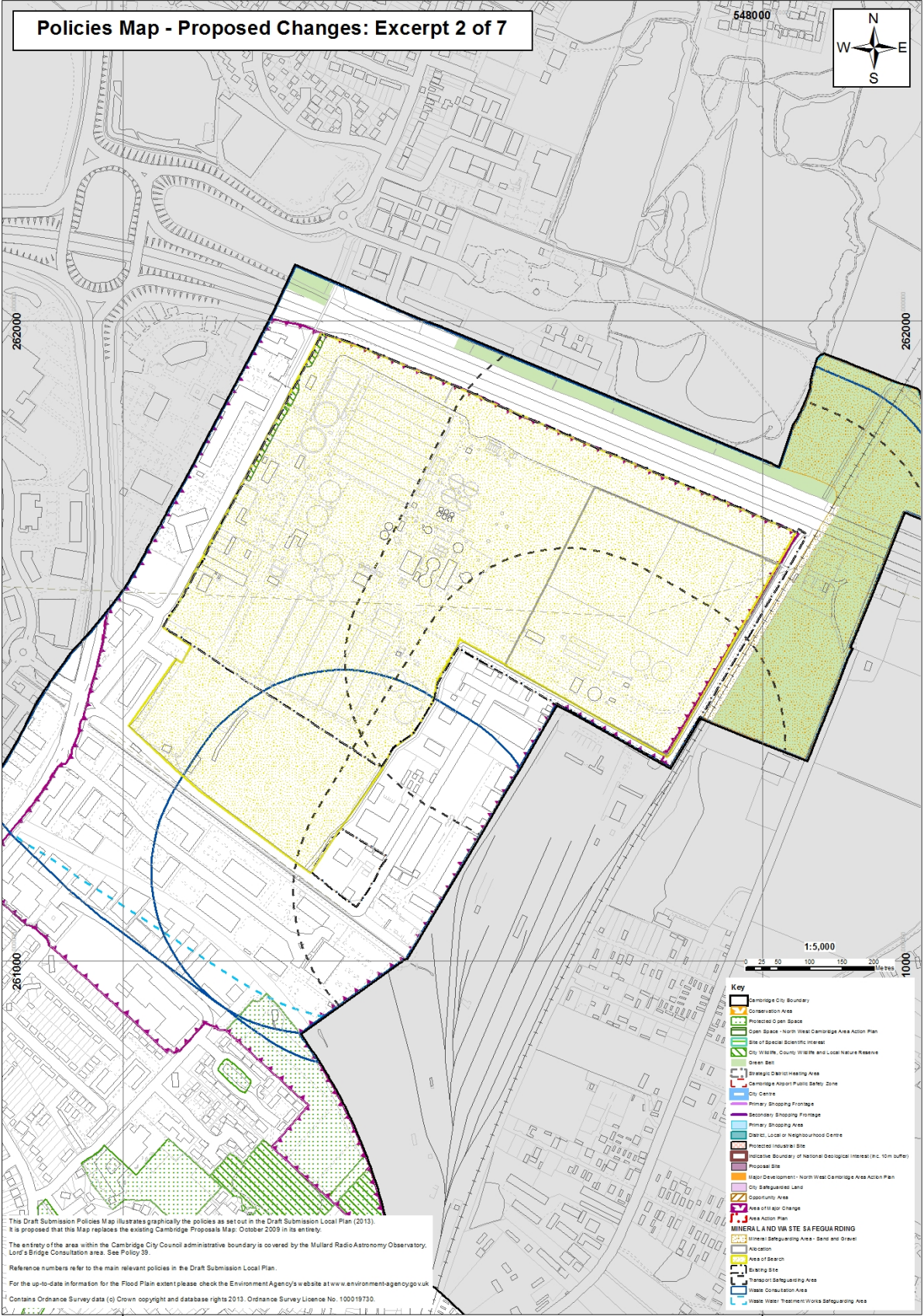
Key

-  Cambridge City Boundary
-  Conservation Area
-  Protected Open Space
-  Open Space - North West Cambridge Area Action Plan
-  Site of Special Scientific Interest
-  City Wildlife, County Wildlife and Local Nature Reserve
-  Green Belt
-  Strategic District Heating Area
-  Cambridge Airport Public Safety Zone
-  City Centre
-  Primary Shopping Frontage
-  Secondary Shopping Frontage
-  Primary Shopping Area
-  District, Local or Neighbourhood Centre
-  Protected Industrial Site
-  Indicative Boundary of National Geological Interest (inc. 10m buffer)
-  Proposal Site
-  Major Development - North West Cambridge Area Action Plan
-  City Safeguarded Land
-  Opportunity Area
-  Area of Major Change
-  Area Action Plan

MINERAL AND WASTE SAFEGUARDING

-  Mineral Safeguarding Area - Sand and Gravel
-  Allocation
-  Area of Search
-  Existing Site
-  Transport Safeguarding Area
-  Waste Consultation Area
-  Waste Water Treatment Works Safeguarding Area

Policies Map - Proposed Changes: Excerpt 2 of 7



- Key**
- Cambridge City Boundary
 - Conservation Area
 - Protected Open Space
 - Open Space - North West Cambridge Area Action Plan
 - Open Space - South West Cambridge Area Action Plan
 - City Wildlife, Countryside and Local Nature Reserve
 - Green Belt
 - Strategic District Heating Area
 - Cambridge Airport Public Safety Zone
 - City Centre
 - Primary Shopping Frontage
 - Secondary Shopping Frontage
 - Primary Shopping Area
 - District, Local or Neighbourhood Centre
 - Protected Industrial Site
 - Indicative Boundary of National Geological Interest (i.e. 10m buffer)
 - Proposed Site
 - Major Development - North West Cambridge Area Action Plan
 - City Redeveloped Land
 - Opportunity Area
 - Area of Major Change
 - Area Action Plan
- MINERAL AND WASTE SAFEGUARDING**
- Mineral Safeguarding Area - Bands and Street
 - Allocation
 - Area of Search
 - Existing Site
 - Mineral Safeguarding Area
 - Waste Consultation Area
 - Waste Works Treatment Works Safeguarding Area

This Draft Submission Policies Map illustrates graphically the policies as set out in the Draft Submission Local Plan (2013). It is proposed that this Map replaces the existing Cambridge Proposals Map, October 2009 in its entirety.

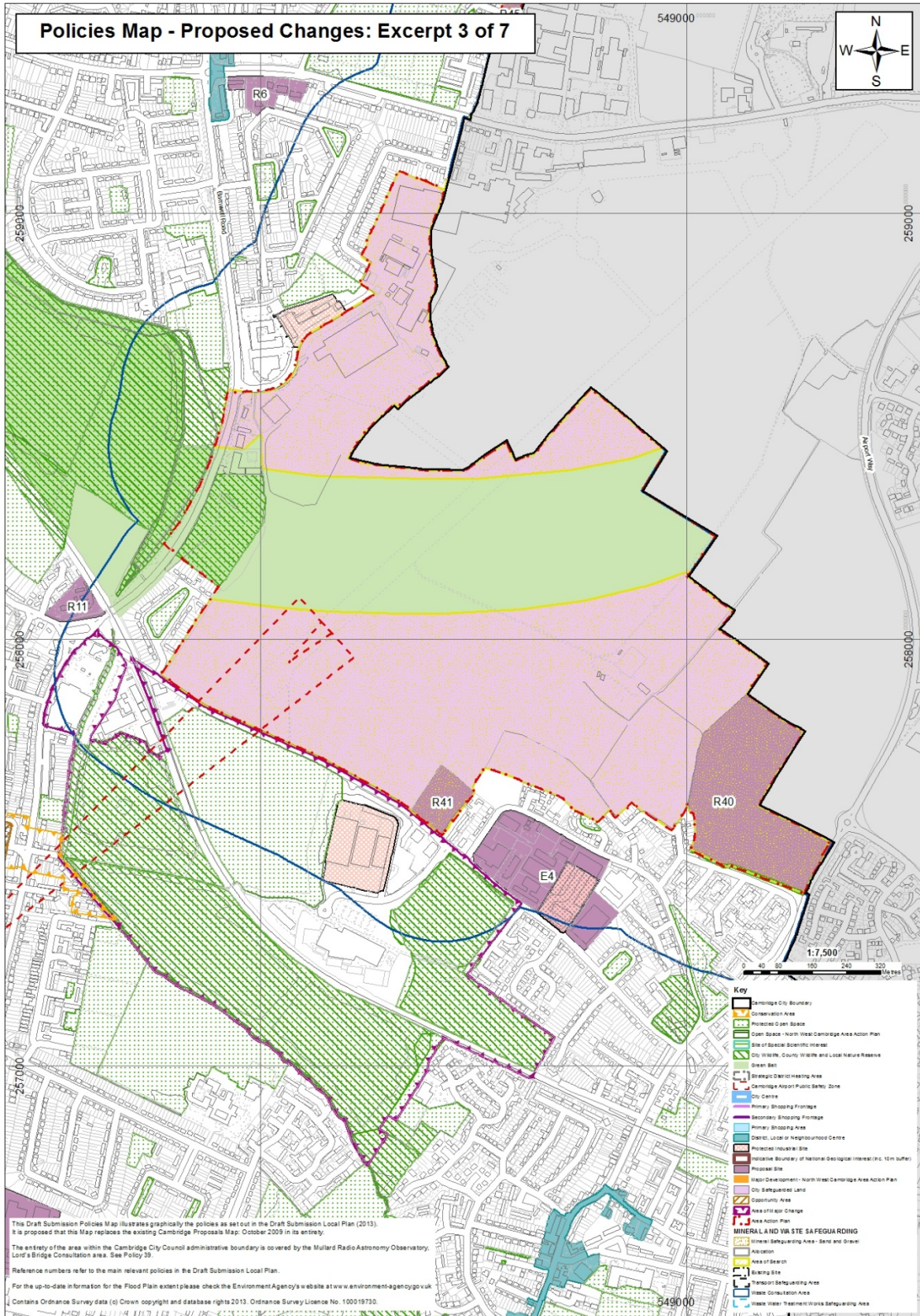
The entirety of the area within the Cambridge City Council administrative boundary is covered by the Mullard Radio Astronomy Observatory, Lord's Bridge Consultation area. See Policy 59.

Reference numbers refer to the main relevant policies in the Draft Submission Local Plan.

For the up-to-date information for the Flood Plain extent please check the Environment Agency's website at www.environment-agency.gov.uk

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Policies Map - Proposed Changes: Excerpt 3 of 7



- Key**
- Cambridge City Boundary
 - Coastal Protection Area
 - Proposed Open Space
 - Open Space - North West Cambridge Area Action Plan
 - Site of Special Scientific Interest
 - City Waste, County Waste and Local Nature Reserve
 - Green Belt
 - Strategic District Heating Area
 - Cambridge Airport Public Safety Zone
 - City Centre
 - Primary Shopping Frontage
 - Secondary Shopping Frontage
 - Primary Shopping Area
 - District Local or Neighbourhood Centre
 - Proposed Industrial Site
 - Indicative Boundary of National Geodiversity Interest (c. 10m buffer)
 - Proposed Site
 - Major Development - North West Cambridge Area Action Plan
 - Coastal Area
 - Area of Strategic Change
 - Area Action Plan
- MINERAL AND WASTE SAFEGUARDING**
- Mineral Safeguarding Area - Sand and Gravel
 - Area of Search
 - Existing Site
 - Transport Safeguarding Area
 - Waste Consultation Area
 - Waste Water Treatment Works Safeguarding Area

This Draft Submission Policies Map illustrates graphically the policies as set out in the Draft Submission Local Plan (2013). It is proposed that this Map replaces the existing Cambridge Proposals Map, October 2009 in its entirety.

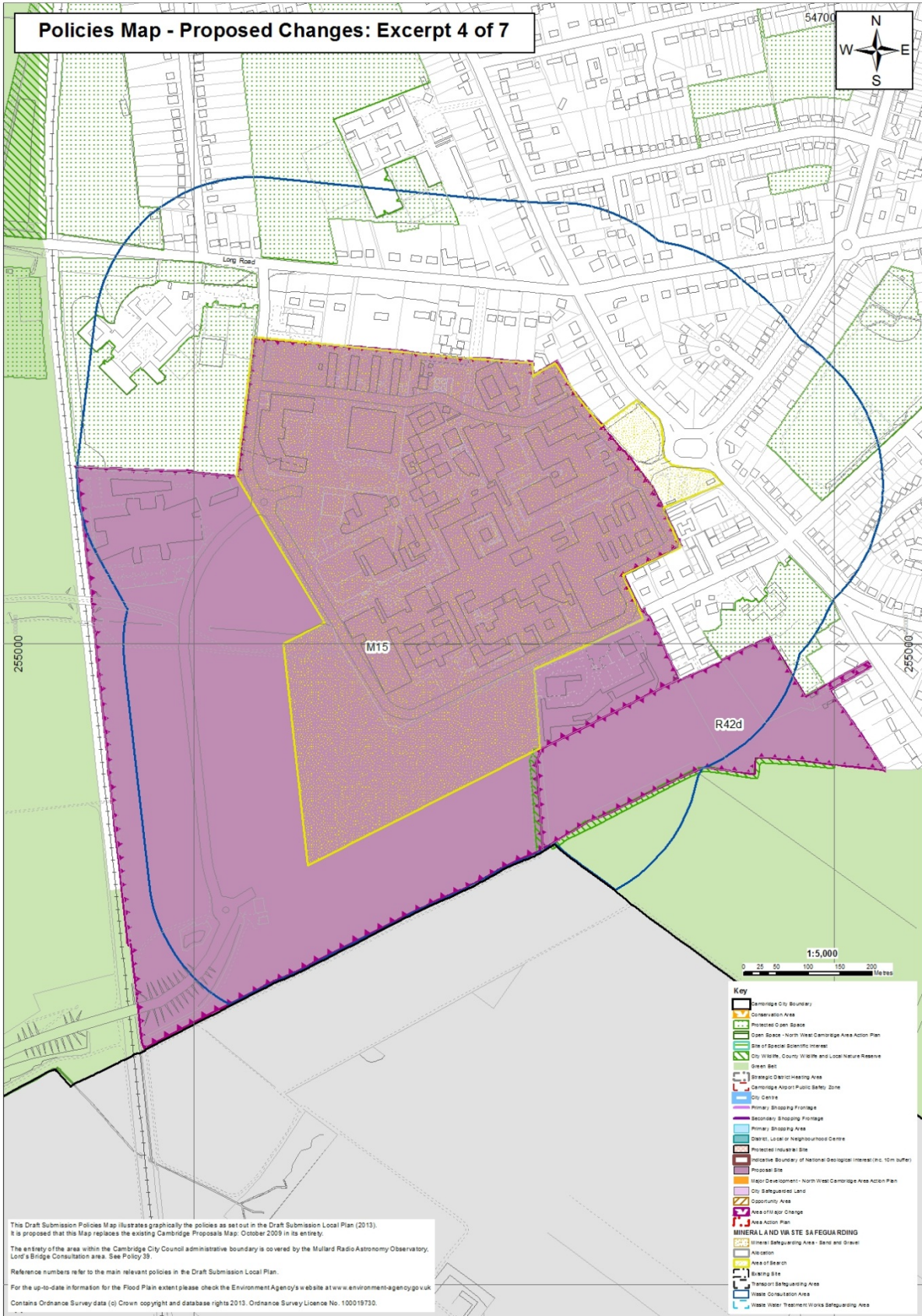
The entirety of the area within the Cambridge City Council administrative boundary is covered by the Mullard Radio Astronomy Observatory, Lord's Bridge Consultation area. See Policy 39.

Reference numbers refer to the main relevant policies in the Draft Submission Local Plan.

For the up-to-date information for the Flood Plain extent please check the Environment Agency's website at www.environment-agency.gov.uk

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Policies Map - Proposed Changes: Excerpt 4 of 7



This Draft Submission Policies Map illustrates graphically the policies as set out in the Draft Submission Local Plan (2013). It is proposed that this Map replaces the existing Cambridge Proposals Map, October 2009 in its entirety.

The entirety of the area within the Cambridge City Council administrative boundary is covered by the Mullard Radio Astronomy Observatory, Lord's Bridge Consultation area. See Policy 33.

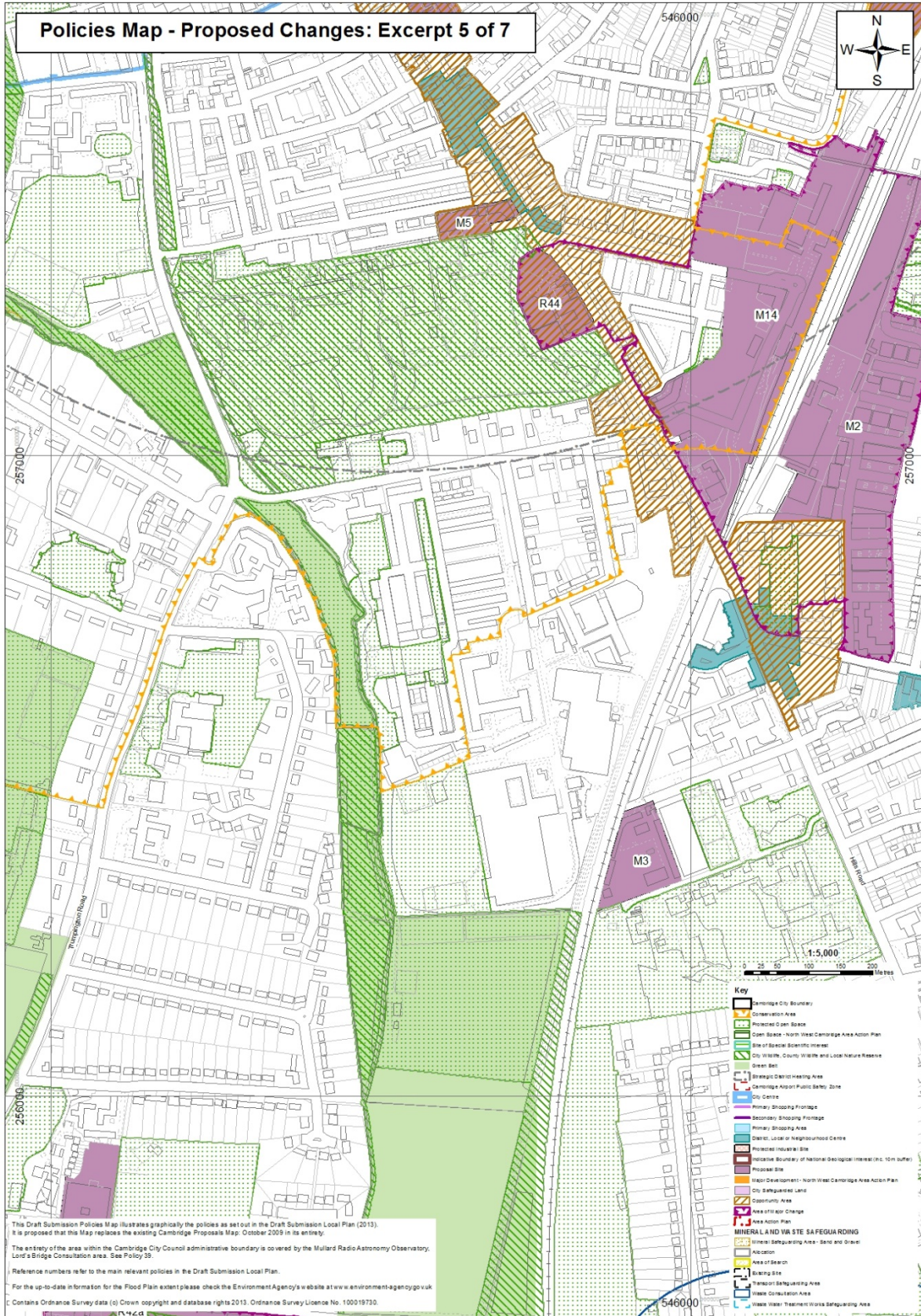
Reference numbers refer to the main relevant policies in the Draft Submission Local Plan.

For the up-to-date information for the Flood Plain extent please check the Environment Agency's website at www.environment-agency.gov.uk

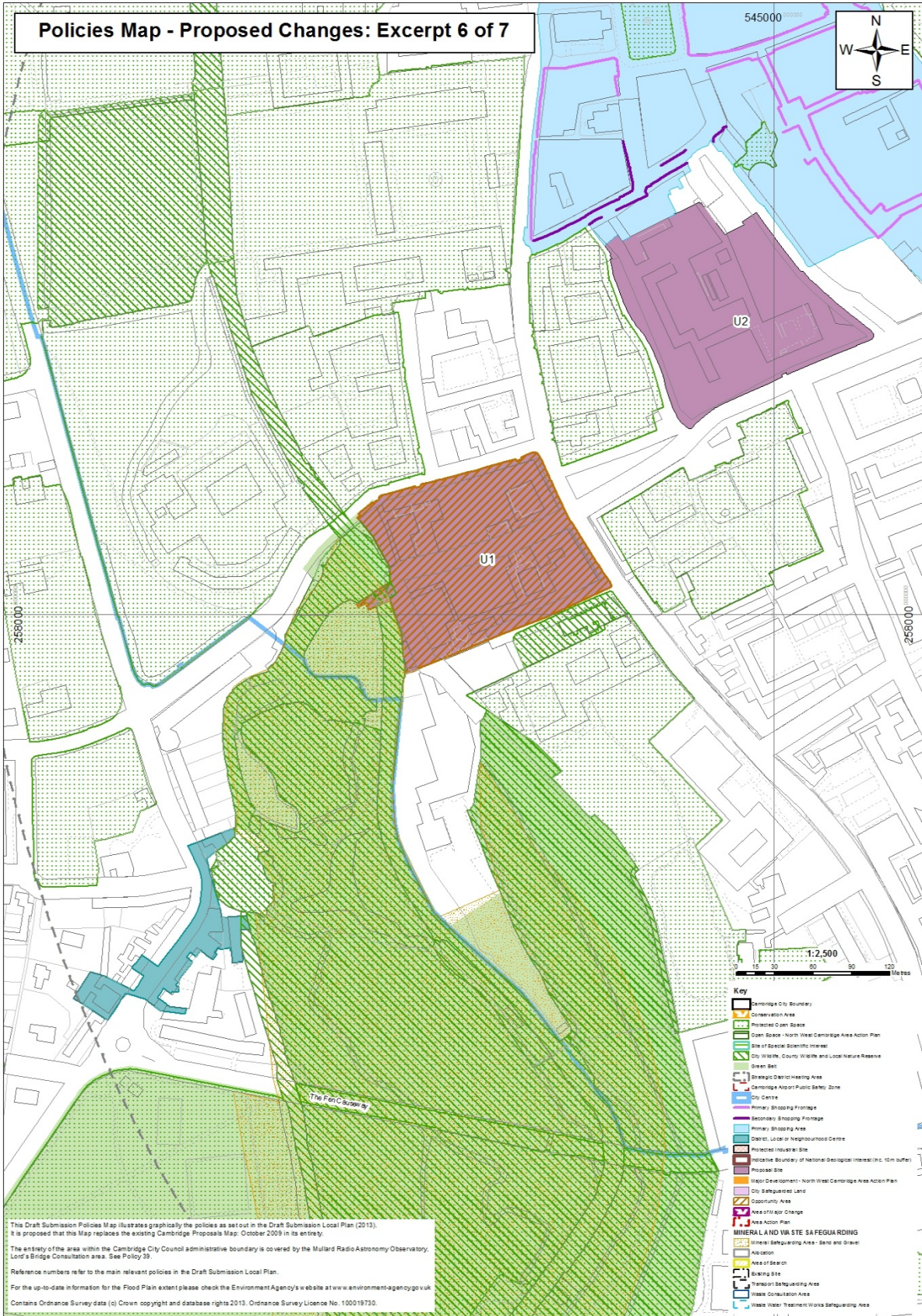
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- Key**
- Cambridge City Boundary
 - Conservation Area
 - Proposed Open Space
 - Open Space - North West Cambridge Area Action Plan
 - Site of Special Scientific Interest
 - City Wildlife, County Wildlife and Local Nature Reserves
 - Green Belt
 - Strategic District Heating Area
 - Cambridge Airport Public Safety Zone
 - City Centre
 - Primary Shopping Frontage
 - Secondary Shopping Frontage
 - Primary Shopping Area
 - District Local or Neighbourhood Centre
 - Proposed Industrial Site
 - Indicative Boundary of National Geological Interest (inc. 10m buffer)
 - Proposed Site
 - Major Development - North West Cambridge Area Action Plan
 - City Safeguarded Land
 - Opportunity Area
 - Area of Change
 - Area Action Plan
- MINERAL AND WASTE SAFEGUARDING**
- Mineral Safeguarding Area - Sand and Gravel
 - Allocation
 - Area of Search
 - Working Site
 - Transport Safeguarding Area
 - Waste Consultation Area
 - Waste Water Treatment Works Safeguarding Area

Policies Map - Proposed Changes: Excerpt 5 of 7



Policies Map - Proposed Changes: Excerpt 6 of 7



This Draft Submission Policies Map illustrates graphically the policies as set out in the Draft Submission Local Plan (2013). It is proposed that this Map replaces the existing Cambridge Proposals Map, October 2009 in its entirety.

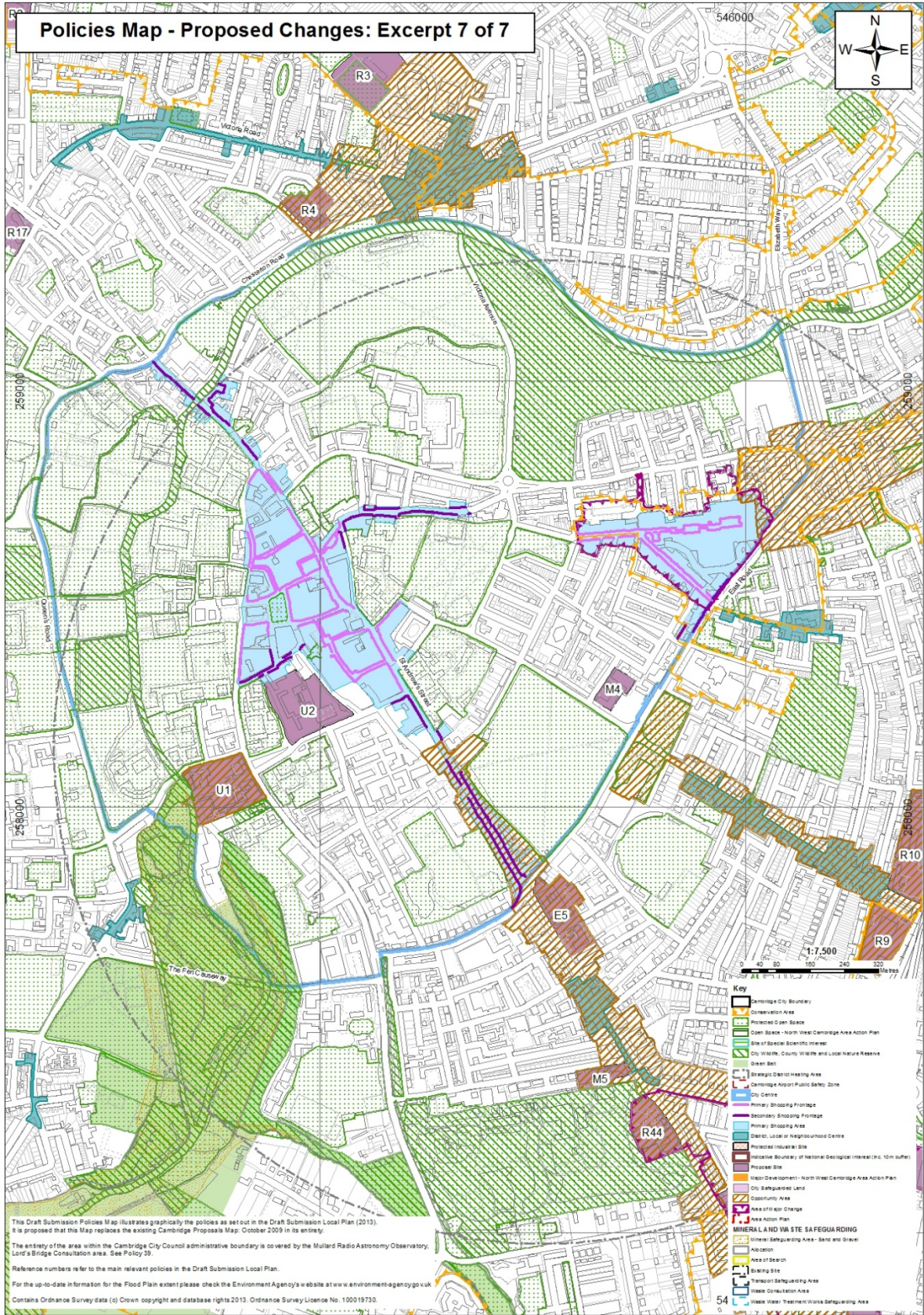
The entirety of the area within the Cambridge City Council administrative boundary is covered by the Mullard Radio Astronomy Observatory, Lord's Bridge Consultation area. See Policy 39.

Reference numbers refer to the main relevant policies in the Draft Submission Local Plan.

For the up-to-date information for the Flood Plain extent please check the Environment Agency's website at www.environment-agency.gov.uk

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Policies Map - Proposed Changes: Excerpt 7 of 7



APPENDIX 4: ISSUES AND OPTIONS 2 CONSULTATION PUBLIC NOTICE

Cambridge City Council Cambridge Local Plan Review



Notice of publication of the Cambridge Local Plan Towards 2031 - Issues and Options Report 2 (January 2013) for public consultation

Cambridge City Council is in the process of preparing a new Local Plan, which will plan for and manage development in the City of Cambridge until 2031. The Issues and Options 2 consultation follows on from the Issues and Options Consultation held in June/July 2012.

The document is split into two parts. Produced in partnership with South Cambridgeshire District Council, Part One includes sites on the edge of Cambridge, which could be allocated for residential and employment development in the Local Plan. It also sets out site options for a community stadium.

Part Two of the consultation document includes: sites options within the urban area for a range of uses, new residential car parking standards, cycle parking standards, residential space standards, and site designations which we would also like your views on.

The six-week consultation period on the Issues and Options 2 documents and their associated Interim Sustainability Appraisals is from **9am on 7th January 2013 until 5pm on 18th February 2013.**

The Issues and Options 2 documents and their Interim Sustainability Appraisals and other relevant supporting documents are available for inspection:

- Online on the City Council's website:
www.cambridge.gov.uk/options2
- At Cambridge City Council's Customer Service Centre at Mandela House, 4 Regent Street, Cambridge, CB2 1BY from 8am-6pm on Mondays, Tuesdays, Wednesdays and Fridays, and 9am-6pm on Thursdays.

You can also visit exhibitions and speak to representatives of the Council as follows:

- 7 January - Grantchester Village Hall, High Street, Grantchester - 2.30pm to 7.30pm
- 8 January - Castle Street Methodist Church, Castle Street, Cambridge - 2.30pm to 7.30pm
- 9 January - The Swifts, Haggis Gap, Fulbourn - 2.30pm to 7.30pm
- 10 January - The Hub, Cambourne - 2.30pm to 7.30pm
- 12 January - Jubilee Room, Trumpington Village Hall, High Street, Trumpington - Midday to 4pm
- 14 January - Small Hall, Guildhall, Market Square, Cambridge - 2.30pm to 7.30pm
- 16 January - Memorial Hall, Woollards Lane, Great Shelford - 2.30pm to 7.30pm
- 18 January - Room 2, Meadows Community Centre, 1 St Catharine's Road, Cambridge - 2.30pm to 7.30pm
- 21 January - Small Hall, Guildhall, Market Square, Cambridge - 2.30pm to 7.30pm

- 22 January - Histon and Impington Recreation Ground, New Road, Impington - 2.30pm to 7.30pm
- 25 January - Large Meeting Room, Cherry Hinton Village Centre, Colville Road, Cambridge - 2.30pm to 7.30pm
- 26 January - Atrium Hall, The Netherhall School and Sixth Form College, Queen Edith's Way, Cambridge - Midday to 4pm
- 28 January - Newnham Croft Primary School, Chedworth Street, Cambridge - 2.30pm to 7.30pm
- 1 February - Brown's Field Youth and Community Centre, 31a Green End Road, Cambridge - 2.30pm to 7.30pm

The Issues and Options 2 documents and Sustainability Appraisals can also be purchased from the Customer Service Centre (Tel: 01223 457000).

Comments should be made using:

- The online response system available on the City Council's website <http://cambridge.jdi-consult.net/ldf/>;
- Printed response forms are available from the Customer Service Centre (as above) or can be downloaded and filled in electronically by visiting www.cambridge.gov.uk/options2

Completed response forms should be sent to:

- Local Plan Review Issues and Options 2 Consultation, Planning Policy Team, Cambridge City Council, PO Box 700, Cambridge, CB1 0JH
- Or emailed to policysurveys@cambridge.gov.uk

Please submit your comments before **5.00pm on 18th February 2013**

Any representations submitted in relation to the Issues and Options 2 consultation may also be accompanied by a request to be notified of the submission of the draft Local Plan to the Secretary of State.

For further information, please contact the Planning Policy team as follows:

- Tel: 01223 457000
- Email: policysurveys@cambridge.gov.uk

Patsy Dell
Head of Planning
Cambridge City Council

Date of Notice: 7th January 2013

APPENDIX 5: AUDIT TRAIL FOR THE RECOMMENDED SUSTAINABLE DEVELOPMENT STRATEGY

Joint Strategic Transport and Spatial Planning Group (JST&SPG) 22 May 2013

To: Members of the JST&SPG (Cambridge City Council, South Cambridgeshire District Council and Cambridgeshire County Council)

From: Head of Planning Services, Cambridge City Council and Director of Planning, South Cambridgeshire District Council

Date: 22 May 2013

Cambridge Local Plan and South Cambridgeshire Local Plan: Strategy, Strategic Sites and other Joint Issues

1.0 Purpose of the Report

- 1.1 To advise Members of the JST&SPG of the recommended sustainable development strategy approach for Cambridge and South Cambridgeshire, the cooperative basis upon which this work has been prepared, the matters that have been taken into consideration in the development of that approach, the representations to consultation that have been received and the sustainability assessment of the recommended approach.
- 1.2 To advise Members of the other joint issues relevant to plan making for both councils and the suggested approach to these.

2.0 Introduction

- 2.1 Cambridge City Council and South Cambridgeshire District Council are preparing new development plans for the Cambridge area for the period to 2031. Both plans will be underpinned by the new Transport Strategy for Cambridge and South Cambridgeshire (TSC&SC) and will set out policies and proposals meeting the objectively assessed development needs of the area and guiding future development to 2031.
- 2.2 The Councils have a long history of joint working and have been working closely together on plan production for the last two years. They will continue to do so, through to the adoption of both new plans and after. There is a strong interaction between the two administrative areas. South Cambridgeshire encircles Cambridge and many residents of the district look to the city for services and jobs, whilst Cambridge employers also look to South Cambridgeshire and beyond for part of their workforce. Two coordinated rounds of Issues and Options consultation have been undertaken in Summer 2012 and Winter 2013, with the latter including a joint consultation on shared issues. The draft Local Plans will be consulted upon in the summer of 2013 and will also be coordinated in respect of joint issues.
- 2.3 The councils have approached the preparation of their development plans collectively, carefully considering the appropriate approach to the development of a sustainable development strategy for the city of Cambridge and the settlements and rural area that surrounds it. A number of common strategic issues were consulted upon jointly in early 2013 including:

- The appropriate approach to delivering growth in or close to Cambridge
- Policy options relating to the Cambridge Green Belt
- The role of Cambridge East in the new development plan strategies
- Cambridge Northern Fringe East
- Proposals for Community Stadia and other facilities

3.0 The Current Development Strategy

3.1 The current development strategy for the Cambridge area stems from as far back as 1999, from the work undertaken by Cambridge Futures, which influenced the 2000 Regional Plan for East Anglia and the 2003 Cambridgeshire and Peterborough Structure Plan. Prior to that date, development in Cambridge had been constrained by the Green Belt. One of the effects of this constraint was that housing development which would have taken place in Cambridge was dispersed to towns and villages beyond the outer boundary of the Green Belt, with people commuting back to jobs in Cambridge contributing to congestion, greenhouse gas emissions, air quality problems and other quality of life issues. The change in strategy introduced in the 2003 Cambridgeshire Structure Plan recognised that a significant change in the approach to the planning of the city was required in order to help redress the imbalance between homes and jobs in, and close to, Cambridge. It also needed to provide for the long-term growth of the University of Cambridge and Addenbrooke’s Hospital, whilst minimising increases in congestion on radial routes into the city.

3.2 The existing Cambridge Local Plan (2006) and South Cambridgeshire Local Development Framework (adopted between 2007 and 2010) introduced a step change in levels of planned growth, unmatched since the interwar years. This was consistent with the agreed development strategy for the Cambridge area set out in the 2003 Cambridgeshire and Peterborough Structure Plan. The Plans released significant land from the Cambridge Green Belt and allocated a number of urban extensions to the city in the south, north-west, north east and east of the city.

3.3 The strategy in the Cambridgeshire and Peterborough Structure Plan 2003 and carried into the two Councils’ current plans focussing development according to a sustainable development sequence:

The Current Development Sequence:

1. Within the urban area of Cambridge
2. On the edge of Cambridge
3. In the new town of Northstowe
4. At market towns (in neighbouring districts) and in better served villages.

3.4 The Cambridgeshire Structure Plan envisaged the following approach to Development following this sequence:

Structure Plan 2003 Development Sequence	Cambridge	South Cambridgeshire Only	Cambridge and South Cambridgeshire	%
Cambridge	6500	2,400	8900	27
Edge of Cambridge	6000	2000	8000	25
New settlement(s)		6,000	6,000	18
Villages		9,600	9,600	30
TOTAL 1999 to 2016	12,500	20,000	32,500	100

3.5 The 2003 Structure Plan identified broad locations to be released from the Green Belt on the edge of Cambridge, which had been identified in Green Belt reviews as having less significance in terms of the purposes of the Cambridge Green Belt. The only exception to this was land in north west Cambridge to meet the long term development needs of

Cambridge University given its international significance. The strategy was put into effect through the Cambridge Local Plan, the South Cambridgeshire Local Development Framework, and the joint Area Action Plans for North West Cambridge and Cambridge East. All of these plans were subject to extensive periods of public consultation and examination by planning inspectors. The strategy was endorsed and included in the East of England Plan 2008.

- 3.6 Significant progress is being made on the growth sites identified in the Councils' current plans, although progress was temporarily slowed just as sites were coming forward due to the effects of the recession in 2008. However, almost all sites are now progressing well and are either under construction, with planning permission or at pre-application discussion stage.
- 3.7 At the heart of the strategy established in 2003 was the review of the Cambridge Green Belt which released land for a total of around 22,000 homes, of which some 10,000 to 12,000 were to be built at Cambridge East in both Cambridge and South Cambridgeshire. This included development that would take place beyond 2016 where it required the relocation of Cambridge Airport. In 2009, the landowner - Marshalls of Cambridge - advised that Cambridge Airport would not be made available in this plan period at least, as an appropriate relocation sites could not be found. This means that the major development opportunities at Cambridge East cannot be part of the development strategy in the new Local Plans, and so the full implementation of the current development strategy cannot take place in the plan period to 2031. Marshall has recently announced a renewed intention to develop the allocated site north of Newmarket Road for around 1,200 homes with a planning application expected in 2013 and development north of Cherry Hinton in both Councils' areas (which they jointly own with another landowner) following later, which the Councils consider could provide around 500 homes.

4.0 Continuing a Sustainable Development Strategy

- 4.1 Throughout the preparation of the existing plans, there was strong local acknowledgement for future growth to follow a more sustainable spatial pattern of development in the Cambridge area to help mitigate commuting by car to jobs in and close to Cambridge and the resulting congestion and emissions.
- 4.2 As part of the review of the Regional Spatial Strategy (RSS) for the East of England, the Cambridgeshire authorities commissioned consultants to prepare the Cambridgeshire Development Study. The study was completed in 2009 and looked at how well the existing development strategy was working, forecasts for economic growth, taking account of the beginning of the downturn and how the strategy could be developed if further growth was needed.
- 4.3 The study identified a range of challenges for growth beyond the current development strategy. These included that significant additional expansion to Cambridge (where the economy is stronger) would impact on the integrity of the Green Belt and the concept of Cambridge as a compact city. The study also concluded that without deliverable solutions for transport and land supply, Cambridge centred growth would be difficult to achieve, and would require a fundamental step change in traffic management and travel behaviour.
- 4.4 The study recommended a spatial strategy for Cambridgeshire that was based on delivering the current strategy with further balanced expansion through regeneration in selected market towns, and focussed on making best use of existing infrastructure. However, it did indicate that some additional growth could be located on the edge of Cambridge incorporating a limited review of the Green Belt boundary, in the long term. The key objective of the strategy was to locate homes close to Cambridge or other main employment centres, avoiding dispersed development, and ensuring that travel by

sustainable modes is maximised through connections focussing on improved public transport and reducing the need to travel.

- 4.5 For the review of the development plans the Councils have considered whether the current strategy remains the most appropriate development strategy to 2031, or whether an alternative would be more suitable as a result of current circumstances. The interrelationship between Cambridge and South Cambridgeshire means that decisions cannot be taken in isolation and the future approach needs to remain joined up, as it has been in the past. This is also now a requirement on the authorities under the Duty to Cooperate introduced by the Localism Act 2011. On the whole, South Cambridgeshire looks towards Cambridge in functional terms whilst Cambridge is affected by a tight administrative boundary and surrounding Green Belt, and therefore any decision relating to the spatial strategy in South Cambridgeshire is likely to have an impact on Cambridge and vice versa.
- 4.6 The Councils have reviewed jointly how far the current sustainable development strategy has progressed, what evidence there is that it is achieving its original objectives and what a new sustainable development strategy looks like in view of changes in economic and other circumstances since the current strategy was adopted. It must balance the three strands of sustainability – economic, social, and environmental.
- 4.7 Where Green Belts are defined, they should only be altered in exceptional circumstances when preparing a Local Plan. When reviewing Green Belt boundaries, Councils are required to take account of the need to promote sustainable development and consider the consequences for sustainable development of channelling development towards urban areas within Green Belts, to villages inset within the Green Belt and to locations beyond the Green Belt.
- 4.8 This sets a considerable challenge for the Cambridge area, in the context of:
- A strong and growing economy;
 - The need for new homes to support the jobs and the aim to provide as many of those new homes as close to the new jobs as possible to minimise commuting and the harmful effects for the environment, climate change and quality of life that it brings; and
 - A tightly drawn Green Belt to protect the unique character of Cambridge as a compact, dynamic city with a thriving historic centre, to maintain and enhance the quality of its setting, that helps underpin the quality of life and place in Cambridge, fundamental to economic success, and to prevent it merging with the ring of necklace villages,
- 4.9 Achieving an appropriate balance between these competing arms of sustainable development is a key objective of the development strategy for the new Local Plans.

5.0 Public Consultation on Strategic Approaches

- 5.1 Over 38,000 representations have been submitted to the councils in response to the two issues and options consultations that have taken place so far. Summaries of the representations, as well as the individual representations, are available to view on the Councils' websites⁴.

⁴ Summary of Representations – South Cambridgeshire Issues and Options 1 (2012) - <http://www.scambs.gov.uk/content/local-plan-historic-consultations>
Issues and Options 2 Part 1 Joint and Part 2 South Cambridgeshire (2013) – <http://www.scambs.gov.uk/io2-summaries-of-reps>

- 5.2 Through the issues and options consultations both Councils sought views on the future development strategy for the area. In 2012 Cambridge sought views on whether there should be more development on the edge of Cambridge through release of the Green Belt. South Cambridgeshire sought views on where development should be focused, on the edge of the City, new settlements, sustainable villages, or a combination.
- 5.3 Through the joint consultation in 2013, the Council's sought views on the appropriate balance between protecting land on the edge of Cambridge that is of high significance to Green Belt purposes, and delivering development away from Cambridge in new settlements and at better served villages.
- 5.4 The majority of representations were that the Green Belt should be protected from further development. Development should be concentrated in new settlements and better served villages, to reduce congestion and avoid pressure on village infrastructure. Further urban extensions received a more limited level of support.
- 5.5 The representations to the strategy options and joint questions from Issues and Options 1 and 2 have been analysed and key issues identified. These are summarised at Appendix A.

6.0 Development Needs and Current Supply

- 6.1 A key role of Local Plans required by the National Planning Policy Framework (NPPF) is to objectively identify and then meet the housing, business and other development needs of an area in a flexible way, unless any adverse impacts of doing so would significantly and demonstrably outweigh the benefits. This must involve using an evidence base to ensure that the Local Plan meets the full, objectively assessed needs for market and affordable housing in the housing market area as far as is consistent with the policies set out on the NPPF, including identifying key sites that are critical to the delivery of the housing strategy over the plan period.
- 6.2 This includes preparation of a Strategic Housing Market Assessment (SHMA) to assess full housing needs, working with neighbouring authorities where housing market areas cross administrative boundaries. The SHMA must identify the scale of housing likely to be needed over the plan period that meets household and population projections, taking account of migration and demographic change and addresses the need for all types of housing, including affordable housing, and caters for housing demand.
- 6.3 The SHMA 'all homes' chapter has now been completed, and identifies the objectively assessed housing for both districts. In order to support the anticipated jobs growth in the area (44,000 in the period 2011 to 2031, South Cambridgeshire: 22,000 Cambridge City: 22,100), 14,000 homes are needed in Cambridge, and 19,000 homes are needed in South Cambridgeshire.
- 6.4 There is a significant amount of housing land identified and allocated in previous plans which remains available, suitable and deliverable. Existing sites in Cambridge account for 10,400 dwellings, and existing sites in South Cambridgeshire including the new town of Northstowe, will deliver 14,000 homes by 2031. This means that of the overall objectively assessed housing need of 33,000 homes, land for a total of around a further 9,000 homes needs to be identified: 5,000 in South Cambridgeshire and 3600 in Cambridge.

7.0 The Duty to Cooperate

View full representations online:
Cambridge City Local Plan – <http://cambridge.jdi-consult.net/ldf/>
South Cambridgeshire Local Plan - <http://scamb.jdi-consult.net/ldf/index.php>

- 7.1 The Localism Act 2011 establishes a Duty to Cooperate for local planning authorities in the preparation of their local plans. The Cambridgeshire Authorities and Peterborough have agreed a Memorandum of Cooperation alongside the SHMA that demonstrates that the full objectively assessed needs of the Cambridge Sub Region housing market area will be addressed. It confirms that Cambridge and South Cambridgeshire are both planning to meet their objectively assessed needs in full within their administrative areas in their new Local Plans. (This is included at Appendix B.
- 7.2 The Duty to Cooperate also applies to county councils and a range of key public bodies with an interest in planning, including the Environment Agency, English Heritage, Natural England, Primary Care Trusts and the Highways Agency. The Councils have engaged with relevant bodies throughout the issues and options stage, in particular on assessment of site options for development.

8.0 Identifying Site Options

- 8.1 Both Councils have explored a range of site options that could meet the additional development requirements to 2031 through their Issues and Options consultations.
- 8.2 In Cambridge, the City Council's Strategic Housing Land Availability Assessment (SHLAA) involved an extensive site search, including issuing a 'call for sites'. Site Options for housing were subject to testing and sustainability appraisal, and public consultation in January 2013.
- 8.3 On the edge of Cambridge, the current Green Belt boundary around the city was established with the expectation that its boundaries could endure to the end of the plan period of 2016 and beyond. However, circumstances have changed, and whilst good progress has been made towards achieving the current development strategy, with development of the fringes all underway with the exception of the Cambridge East airport site, the Councils need to consider as part of preparing their new Local Plans whether there are exceptional circumstances for reviewing Green Belt boundaries again.
- 8.4 The Councils took a joined up approach in the Issues and Options consultations in Summer 2012 and asked whether there should be more development on the edge of Cambridge, if there should be more land released from the Green Belt, and if so, where should this be. Ten Broad Locations around the edge of Cambridge were consulted on to explore whether any had potential to be released from the Green Belt for housing.
- 8.5 This was followed up by a joint review of the Green Belt, to provide detailed and up to date evidence on the potential impact of further releases on the purposes of the Green Belt and the setting of the City. The update found that most of the inner Green Belt continues to be of high importance for Green Belt purposes and specifically important to protect the setting and special character of Cambridge as a compact historic city. The adjacent areas to the previous releases have also gained a greater value.
- 8.6 Drawing on sites submitted through the 'call for sites' and through the Inner Green Belt study, a total of 41 sites were tested, using a joint pro-forma drawing on both Council's Sustainability Appraisals. Following the assessment, 6 sites in the Green Belt on the edge of Cambridge were identified as being sites with development potential, albeit with some constraints or adverse impacts. 4 of these were considered to have potential for employment use, reflecting results of previous employment studies indicating a need for further high quality employment sites close to Cambridge. These sites were subject to public consultation in January 2013.
- 8.7 For the remainder of South Cambridgeshire, nearly 300 sites were submitted through the call for sites, plus a further 58 sites during the 2012 consultation, and tested through the Strategic Housing Land Availability Assessment and subject to sustainability appraisal. A number of sites were rejected at this stage, considered to have no significant

development potential. Sites in the lowest order of settlements, Group or Infill Villages, were also rejected, as allocation at this level would not provide a sustainable development strategy.

- 8.8 A total of 62 site options were subject to consultation through the South Cambridgeshire Issues and Options consultations in 2012 and 2013. This included options for new settlements at Waterbeach and Bourn Airfield, a strategic scale of development at Cambourne, and a range of village sites at Rural Centres, Minor Rural Centres and Better Served Group Villages.

9.0 Considering the Way Forward

- 9.1 The Councils have reviewed and considered the comments received, including Member Workshops for South Cambridgeshire Members and through the Development Plan Scrutiny Sub-Committee for Cambridge City Council Members. The Councils have also considered a range of possible options that flow from the development strategy options and the site options consulted on and tested those through the Sustainability Appraisal process. They have also been tested through transport modelling and as the long list of site options has been narrowed down, key stakeholders have been asked again for their views on the emerging shortlist of sites to help further refine the preferred strategy and package of sites, such as the education authority.

- 9.2 The Councils have considered the Cambridge and South Cambridgeshire Sustainable Development Strategy Review, and the emerging Sustainability Appraisals of the Local Plans. An accompanying report exploring sustainability issues in greater detail is included in Appendix D.

- 9.3 After the urban area of Cambridge, the edge of Cambridge is the next most sustainable location for growth in the development sequence, but the Sustainability Appraisal identifies the importance of balancing the accessibility aspects of sustainable development and the environmental and social benefits it brings, with the significant harm to the landscape and setting environmental aspects of sustainability that development on land in the Green Belt would have, with the resulting irreversible adverse impacts on the special character and setting of Cambridge as a compact historic city and the risks that could have to the economic success of the Cambridge area, which is in part built on its attractiveness as a place to live and work. Results of consultation on the appropriate balance between edge of Cambridge or new settlements and better served villages was strongest to protect the Green Belt.

- 9.4 The effect of decisions on reasonable site options on the edge of Cambridge is to require development away from the Cambridge to meet remaining development needs. New settlements are the next most sustainable location for growth. Options at new town at Waterbeach and a new village at Bourn Airfield have been identified. The sites scored as Amber in the assessment largely because it is inevitable that such a major development will have some adverse impact on some aspects of sustainability, but it was considered that they would be capable of mitigation through carefully designed development proposals. The results of consultation supported concentration on new settlements rather than focus on edge of Cambridge due to Green Belt impacts.

- 9.5 The results of consultation offered some support to better served villages, although to a lesser extent than new settlements. There was concern about the impact on infrastructure, and village character.

10.0 The Suggested Development Strategy

- 10.1 The Councils are now at the stage of identifying the preferred package of housing sites to include in their Local Plans to meet their identified objectively assessed needs. Given the significant level of supply from each Council's current plans of 10,400 for Cambridge and

14,000 for South Cambridgeshire, the Councils need to allocate land for a further 3,600 and 5,000 homes respectively.

- 10.2 Cambridge City Council has identified sites for 3,324 new homes through new allocations and windfall development in the urban area of Cambridge. In addition, land north and south of Worts Causeway is proposed to be removed from the Green Belt and allocated for housing to deliver 430 dwellings. This would enable the City Council to meet its full identified housing needs within its administrative area.
- 10.3 It is also proposed to allocate the 3 sites on Fulbourn Road close to ARM for employment, 2 in Cambridge City Council's area and 1 in South Cambridgeshire.
- 10.4 A small expansion of the existing NIAB2 housing site in South Cambridgeshire between Huntingdon and Histon roads is also proposed, although this would not increase the overall number of homes currently planned but instead provide more room to ensure a high quality development. It is not proposed to include employment on the site so that there is sufficient room for the supporting infrastructure necessary for the housing development to retain a green foreground to Cambridge Road.
- 10.5 Strategic options for new development in South Cambridgeshire focus on new settlements and previously established new settlements, with new allocations for:
- New town at Waterbeach Barracks – 8,000 homes, 1,400 of which by 2031.
 - New village at Bourn Airfield – 3,500 homes, 1,470 of which by 2031.
 - Cambourne West – 1,500 homes, all by 2031.
- 10.6 The preference to allocate all three strategic sites reflects that the first two new sites will come forward later in the plan period and continue developing beyond 2031. Without also including major expansion of Cambourne, a significant amount of development would be required at villages and would result in a less sustainable development strategy. Bourn Airfield new village would be delayed by two years to come forward slightly later in the plan period than it otherwise might, so that the remainder of Cambourne is well progressed before any development starts at Bourn Airfield. This will also help provide additional flexibility. The strategic sites will provide 4,370 homes in the plan period.
- 10.7 The major sites will be supported by limited development at more sustainable villages in the order of 900 homes to provide flexibility and help ensure a continuous supply of housing land over the plan period, including if there is any delay in progress on any of the major sites.

(Note: the preferred village sites will be considered at South Cambridgeshire's Planning Policy and Localism Portfolio Holder's meeting on 11 June)

- 10.8 The table below shows the level of development proposed at each stage of the development sequence:

CAMBRIDGE AND SOUTH CAMBRIDGESHIRE HOUSING 2011 TO 2031	Existing Completions and Commitments (both areas)	New Sites Cambridge	New Sites South Cambs	TOTAL	Percentage
Cambridge Urban Area	3,287	3,324	0	6,611	20
Edge of Cambridge	11,361	430	100	11,891	35
New Settlements	5,965	0	4,370	10,335	31
Villages	3,853	0	895	4,748	14
TOTAL	24,466	3,754	5,365	33,585	100

- 10.9 The development strategy identified includes development at a number of levels in the sequence taking account of the opportunities and constraints identified.
- 10.10 Cambridge remains the focus of the development strategy comprising 55% of the housing requirement 2011 to 2031. This is comparable with and slightly higher than the 52% in the Structure Plan strategy.
- 10.11 Only minor additional Green Belt development potential was identified on the edge of Cambridge in addition to the extensive existing commitments because of the significant harm this would cause to the purposes of the Green Belt. The additional dwellings, added to those already committed, mean that 35% of all new development is planned on the edge of Cambridge, compared with 25% in the Structure Plan.
- 10.12 In addition to the new settlement at Northstowe, the strategy proposes additional new settlements at Bourn Airfield, and in the longer term Waterbeach Barracks. This will enable infrastructure investment to be focused to maximise benefits, maximise travel by non-car modes, support the re-use of significant previously developed sites, and reduce the need for further development at villages as the final and least sustainable stage in the development sequence, although some village development is proposed to provide flexibility.
- 10.13 At the village level, development will be focused on the more sustainable villages with the best range of services and facilities, including taking account of opportunities to utilise previously developed land.
- 10.14 A comparison with the Structure Plan 2003 strategy is provided below.

	Structure Plan 1999 to 2016	Percentage	New Strategy 2011 - 2031	Percentage
Cambridge Urban Area	8,900	27	6,611	20
Cambridge Fringe Sites	8,000	25	11,891	35
New Settlements	6,000	18	10,335	31
Villages	9,600	30	4,748	14
TOTAL	32,500	100	33,585	100

- 10.15 The overall percentage of development at Cambridge has actually been increased slightly compared to the previous strategy, with 55% compared with the previous 52%. New settlements have been given a more prominent role than village development with the proportions effectively swapping over. This demonstrates that the proposed new development strategy remains sustainable and is actually more sustainable than the strategy originally proposed in the Structure Plan.

Infrastructure to support growth

- 10.16 The emerging Local Plans have been prepared in the light of a significant base of evidence and understanding of the Infrastructure issues in Cambridge and South Cambridgeshire, including but not limited to:
- Transport evidence – including transport modelling and the development of a comprehensive transport strategy for Cambridge and South Cambridgeshire (to be covered in the report elsewhere on this agenda) to identify appropriate sustainable transport responses to committed and new growth
 - Education matters, in consultation with the County Council, to address the requirements of new growth

- Water supply, drainage, flood risk, in consultation with the Environment Agency and water supply/treatment utilities
- An Infrastructure Study to identify critical, necessary and desirable infrastructure requirements, funding sources, funding gaps and the timetable for infrastructure provision
- Sustainability Assessment to ensure the plan strategies have tested all reasonable alternatives and that the proposed strategies will meet the sustainable development requirements of the NPPF
- Viability assessment of the strategic approach of both Local Plans and to support bringing forward appropriate charging schedules for the introduction of the Community Infrastructure Levy.

11.0 Other Joint Issues

Cambridge East

- 11.1 Marshall has made clear its intention to remain at its current site for the foreseeable future. Notwithstanding, in the event that Marshall were to decide in the longer term to make the site available for development, a major urban expansion to Cambridge at the Cambridge Airport site remains a very sustainable location for long term development. In plan making terms, it is considered a reasonable and appropriate response to the changed circumstances since the current plan for the land to remain out of the Green Belt and to apply a safeguarding policy to the Airport site, saying that it is safeguarded for possible long term new urban quarter to Cambridge if it becomes available, and that it would be brought forward through a review of the Local Plan. The Cambridge East Area Action Plan would remain 'live' and could be drawn on as necessary, either in its current form or through a review depending on circumstances at the time of any future development. A policy should be included in the Local Plans to make clear that the development north of Newmarket Road and north of Cherry Hinton will come forward in the plan period and that the Airport site is safeguarded for potential longer term residential led development.

Cambridge Northern Fringe East

- 11.2 Cambridge Northern Fringe East remains an important part of the sustainable development strategy for Cambridge. The area has land under each district council's administrative purview, as well as being important to the County Council for its potential to support a number of key transport and minerals/waste infrastructure requirements. The area needs to be looked at and planned comprehensively, including urgent feasibility investigation of the opportunities that could come from the provision of an upgraded and condensed wastewater treatment facility on the site. The area will receive an important infrastructure boost with the provision of Cambridge Science Park Station, anticipated to open in 2015.
- 11.3 The councils held a joint workshop with stakeholders on 12th April 2013. The importance of the area to the future economic success of Cambridge and to the wider residential, business, academic and infrastructure communities is clear. The suggested approach is for a joint Action Area Plan to guide the wider employment-led development of this area over the plan period, including having regard to the needs of existing businesses and strategic rail, waste and mineral extraction facilities. Planning proposals (other than for the new station and its associated facilities) will be expected to come forward once the action area plan has been prepared and adopted.

Sub-Regional facilities

Community Stadia

- 11.4 The Issues and Options consultation undertaken jointly in winter 2013 asked a number of questions about these facilities and consulted on nine potential site options that had been put forward.
- 11.5 Questions were asked about the need for a community stadium serving the sub-region, about the principles identified for the vision for a community stadium and whether the need for a stadium in the Cambridge Sub-Region would be sufficient to meet the exceptional circumstances test for release of land in the Cambridge Green Belt to accommodate such a facility.
- 11.6 The representations received and the key issues raised in relation to these questions are summarised in Appendix A and were as follows: The majority of respondents considered that a community stadium is needed (Support: 384, Object: 70 Comment 130), and for the vision and principles set out in the consultation document at paragraph 10.7. There was also support that the need for the Community Stadium should outweigh Green Belt considerations (303 responses) but with a substantial body of opinion that it should not (62 responses). Regarding the site options consulted on, the most commented options were site CS5 south of Trumpington Meadows (306 supports, 92 representations objecting). In addition petitions totalling 900 signatures objecting to the option originally submitted to the City Council in 2012 were referenced), and the least supported option being site CS4 at NIAB3 (9 supports and 192 objections).
- 11.7 A number of the sites were confirmed as unavailable by the landowners concerned and some are in Green Belt. Objective, up to date evidence of need for a community stadium is not considered to have been demonstrated. It follows that the starting point for any consideration of exceptional circumstances to justify a site release in the Cambridge Green Belt would also require need to be objectively evidenced. The site proposed at Trumpington Meadows would be particularly harmful to the purposes of the Cambridge Green Belt.

• **Ice Rink and Concert Hall**

- 11.8 No specific deliverable sites were put forward as part of the Issues and Options 2 consultation, instead questions were asked at that stage about the principles of these types of uses and whether a general policy should be developed in both local plans to assist the consideration of any proposals for these types of sub-regional facilities if they are put forward by promoters in future.
- 11.9 There were 32 representations of support for this approach, 12 representations objecting as well as a number of comments. Other key issues cited were accessibility by public transport, the viability of any development, and avoiding development in the Green Belt. There was support for the principles set out in the consultation document at paragraph 10.17.

12.0 Next Steps

- 12.1 The Councils have a number of formal meetings where approval of the new draft Local Plans and the Transport Strategy for Cambridge and South Cambridgeshire will be considered. Consultation on the documents is then proposed to take place for 10 weeks over the summer. This timetable is necessary to ensure that both local plans can be submitted to the Secretary of State in spring 2014 for examination later in the year.

Cambridge City Council	South Cambridgeshire District Council	Cambridgeshire County Council (Transport Strategy)
Joint Strategic Transport and Spatial Planning Group 22 nd May	Joint Strategic Transport and Spatial Planning Group 22 nd May	Joint Strategic Transport and Spatial Planning Group 22 nd May

Development Plan Scrutiny Sub-Committee 29 th May		
Environment Scrutiny Committee 11 June	Portfolio Holders Meeting 11 June	
Special Full Council Meeting 27 th June	Cabinet 27 th June	Cabinet 18 th June TBC
Joint Consultation: Draft Submission Local Plans and Transport Strategy for Cambridge and South Cambridgeshire 19 th July to 30 th September		

13.0 Recommendations

13.1 That for matters set out in A and B below, the Joint Strategic Transport and Spatial Planning Group advises both councils as follows:

A: The development strategy approach for Cambridge and South Cambridgeshire

[1] That the responses to the joint consultations in Appendix A are noted;

[2] That the memorandum of co-operation approach (Appendix B) agreed jointly by the councils in Cambridgeshire and Peterborough, confirming objectively assessed needs and their spatial distribution is noted and supported as the basis for plan making in Cambridge and South Cambridgeshire;

[3] That the sustainable development strategy sequence set out in section 2, and the sustainability appraisal in Appendix D that accompanies it is noted; and this overall approach be recommended to both councils as the basis for their plan making;

[4] Other than for the exceptional case made on need for release of 6 small sites from the Cambridge Green Belt (GB 1-6) as set out in section 10, the inner boundary of the Cambridge Green Belt to remain as currently designated and no further changes be recommended to both councils as the basis for their plan making;

[5] That the Councils be recommended the following as the basis for plan making in respect of land at the Cambridge East joint fringe site:

- (i) Cambridge Airport remain out of the Green Belt and be designated as strategic long term reserve land;
- (ii) Land North of Newmarket Road and two sites north of Cherry Hinton will be available for development in the period to 2031, using the Cambridge East Area Action Plan as their main planning framework and confirmed by a policy in the new Local Plans.

[6] That the suggested approach to Cambridge Northern Fringe East involving the preparation of an Action Area Plan to guide the development of the wider area be recommended to the councils as the basis for plan making.

B: Sub-Regional Sporting, Cultural and Community Facilities:

[1] As far as community stadia proposals are concerned, the JST&SPG notes the outcomes of the issues and options consultation;

[2] As far as a community stadium is concerned the evidence of need (as opposed to strong desire) for a community stadium on one of the submitted sites has not been satisfactorily demonstrated and the recommendation to the councils for plan making is not to proceed to allocate a site;

[3] The exceptional circumstances case for release of land for a community stadium from the Cambridge Green Belt has not been demonstrated; and the recommendation to the councils for plan making is not to proceed to allocate a site in the Green Belt;

[4] That the response to the council's joint issues and options consultations in relation to other facilities is noted and both councils should be asked to develop specific criteria based policies to deal with sub-regional cultural and community facilities (such as a concert hall and ice rink) should such proposals be put forward in future.

14.0 Appendices

- A. Summary of representations and main issues raised to joint questions from Issues and Options 1 and 2
- B. Cambridgeshire & Peterborough Memorandum of Co-operation Supporting the Spatial Approach 2011-2031
- C. Map showing the suggested sustainable development strategy approach
- D. Reviewing the Sustainable Development Strategy for the Cambridge Area

15.0 Contacts:

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APPENDIX A

SUMMARY OF REPRESENTATIONS

The following text summarises representations received to issues and options matters particularly relevant to the development strategy of the two Local Plans. Some of these representations have been reported to the individual local planning authorities previously, some will be presented over the coming weeks. Responses to these representations are included within the covering report. (Members will note that the two councils have used slightly differing presentation formats).

The following areas are considered:

- Sustainable Development Strategy (including joint issues with Cambridge and strategic sites);
- Green Belt Sites;
- Sub-Regional Sporting, Cultural and Community Facilities;
- Cambridge East;
- Cambridge Northern Fringe East

ISSUE: SUSTAINABLE DEVELOPMENT STRATEGY (INCLUDING JOINT ISSUES WITH CAMBRIDGE AND STRATEGIC SITES)

SOUTH CAMBRIDGESHIRE DISTRICT COUNCIL ISSUES & OPTIONS 1 - Chapter 4: Spatial Strategy (Question 9)

Question 9: *What do you think is the best approach to the development strategy for South Cambridgeshire? All options are expected to need to involve some village development to provide flexibility and early housing provision:*

- i. Cambridge focus (would require a review of the Green Belt) (S:38, O:30, C:3)
 - ii. New Settlement focus (S:57, O:35, C:10)
 - iii. Sustainable Villages focus (would require a review of the Green Belt) (S:27, O:28, C:14)
 - iv. Combination of the above (S:61, O:17, C:16)
- Comments (S:18, O:7, C:79)

Main Views Received:

Cambridge Focus (i)

Pro Development in and on the edge of Cambridge is the most sustainable option in terms of access to jobs, shops, services, and non-car travel modes.

Con The Green Belt has been thoroughly reviewed and there is no more scope for major development. Harm to Green Belt purposes. Exceptional circumstances do not exist as there is scope to develop outside the Green Belt.

New Settlement focus (ii)

Pro Such a strategy would protect the Green Belt and the villages from development. New settlements come with new infrastructure.

Con Less sustainable than a Cambridge focus strategy, new settlements have a long and unpredictable lead-in time.

Village focus (iii)

Pro Small sites so will be quick to deliver. Development can help to support local schools, shops and services.

Con Unsustainable, lack of access to public transport, shops, jobs and services. Loss of village character and amenity.

Combination (iv)

Pro Most robust option in terms of delivery.

Con Harm to Green Belt purposes. New settlements have a long lead in time. Some loss of village character and amenity.

CAMBRIDGE LOCAL PLAN – TOWARDS 2031 AND SOUTH CAMBRIDGESHIRE LOCAL PLAN. ISSUES AND OPTIONS 2 PART 1- JOINT CONSULTATION ON DEVELOPMENT STRATEGY AND SITE OPTIONS ON THE EDGE OF CAMBRIDGE

Chapter 8: A Sustainable Development Strategy for Cambridge and South Cambridgeshire to 2031

Question 1: *Where do you think the appropriate balance lies between protecting land on the edge of Cambridge that is of high significance to Green Belt purposes and delivering development away from Cambridge in new settlements and at better served villages?*

(S:8, O:50, C:229)

Main Views Received:

- Concentrate development in new settlements and better-served villages. This will reduce commuting and relieve congestion in Cambridge (37 reps).
- Concentrate development in new settlements with appropriate infrastructure. Village infrastructure cannot cope with more development (36 reps).
- Concentrate development in Cambridge (8 reps), and in urban extensions to Cambridge (17 reps).
- Concentrate development in the better-served villages (17 reps).
- Protect the Green Belt from development. It has recently been reviewed and releasing land in every plan would make the policy to protect it meaningless. Land is available elsewhere. It provides the setting for Cambridge, maintains its scale, protects the necklace villages and protects wildlife (77 reps)

CAMBRIDGE CITY COUNCIL CAMBRIDGE LOCAL PLAN – TOWARDS 2031 ISSUES AND OPTIONS JUNE 2012.

Chapter 3 – Spatial Strategy

Level of housing provision:

Option 2: 12,700 new homes to	ARGUMENTS IN SUPPORT OF THIS OPTION: <ul style="list-style-type: none">• Strong level of support for this option;
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<p>2031 – urban growth</p> <p>Support = 57 Object = 17</p>	<ul style="list-style-type: none"> • Infrastructure cannot cope with any further housing provision above this level; • Green Belt land must be protected and under this option no further Green Belt release would be required; • The city should give priority to employment, with some of the 2,060 new homes provided in selected villages in South Cambridgeshire; • Growth needs to be limited if the Vision for Cambridge is to be achieved. • Current levels of growth will enable a significant level of growth without destroying the quality of the city; • Additional housing growth should be evenly distributed across the region, taking advantage of an improved public transport system; • Need to experience the results of existing developments before we commit to more. <p>OBJECTIONS TO THIS OPTION:</p> <ul style="list-style-type: none"> • 12,700 too high – keep to the 10,612 already agreed; • Insufficient to meet identified levels of housing need.
<p>Option 3: up to 14,000 new homes to 2031</p> <p>Support = 11 Object = 46</p>	<p>ARGUMENTS IN SUPPORT OF THIS OPTION:</p> <ul style="list-style-type: none"> • Approach is consistent with enlarging the city whilst maintaining its key qualities; • This would help to meet some of the housing need of the city, particularly affordable housing; • This should be the absolute maximum level of growth that should be planned. <p>OBJECTIONS TO THIS OPTION:</p> <ul style="list-style-type: none"> • Cambridge cannot support this level of growth without harming the special character and setting of the city; • Infrastructure capacity cannot deal with this level of growth; • The Green Belt must be protected and any further release would set a dangerous precedent; • Insufficient to meet identified levels of housing need; • No further land should be released from the Green Belt on the basis on forecasts for population and housing projections and jobs, as these are an unreliable source of evidence; • Growth should focus on existing urban area with any shortfalls delivered within a new sustainable village located outside of the Green Belt in South Cambridgeshire; • Would result in negative environmental impacts, including adverse effects on landscape, biodiversity and accessible green infrastructure.
<p>Option 4: up to 21,000 new homes to 2031</p> <p>Support = 3 Object = 45</p>	<p>ARGUMENTS IN SUPPORT OF THIS OPTION:</p> <ul style="list-style-type: none"> • This option would help bring homes and jobs closer together making the city more sustainable. <p>OBJECTIONS TO THIS OPTION:</p> <ul style="list-style-type: none"> • Cambridge cannot support this level of growth without harming the special character and setting of the city. It would compromise the scale and identity of the city; • Infrastructure capacity cannot deal with this level of growth; • The Green Belt must be protected and any further release would set

	<p>a dangerous precedent;</p> <ul style="list-style-type: none"> • Development would undermine the purposes of the Green Belt; • Not compatible with the principles of sustainability; • Growth should focus on existing urban area with any shortfalls delivered within a new sustainable village located outside of the Green Belt in South Cambridgeshire; • Would result in negative environmental impacts, including adverse effects on landscape, biodiversity and accessible green infrastructure.
<p>Option 5: up to 25,000 new homes to 2031</p> <p>Support = 3 Object = 42</p>	<p>ARGUMENTS IN SUPPORT OF THIS OPTION:</p> <ul style="list-style-type: none"> • The Local Plan should be ambitious concerning housing; • This option would help bring homes and jobs closer together making the city more sustainable. <p>OBJECTIONS TO THIS OPTION:</p> <ul style="list-style-type: none"> • Cambridge cannot support this level of growth without harming the special character and setting of the city. It would compromise the scale and identity of the city; • Infrastructure capacity cannot deal with this level of growth; • The Green Belt must be protected and any further release would set a dangerous precedent; • Development would undermine the purposes of the Green Belt; • Not compatible with the principles of sustainability; • Growth should focus on existing urban area with any shortfalls delivered within a new sustainable village located outside of the Green Belt in South Cambridgeshire; • Would result in negative environmental impacts, including adverse effects on landscape, biodiversity and accessible green infrastructure; • Figure is unlikely to be achieved based on historic rates of development.

Levels of employment provision:

<p>Option 6: Plan for 10,000 new jobs to 2031</p> <p>Support = 32 Object = 7</p>	<p>ARGUMENTS IN SUPPORT OF THIS OPTION:</p> <ul style="list-style-type: none"> • Support for the lowest number of jobs as infrastructure and the character of city cannot cope with higher levels of growth; • The state of the global economy and fall in public sector employment means higher forecasts are unrealistic; • Encourage jobs growth elsewhere, in areas where they are more needed and / or have less of an impact on commuting; • Support for the lowest number of jobs as more jobs means more homes; • Future employment may not recover to pre-2000 levels; • Empty units around Cambridge and South Cambridgeshire demonstrate a surplus of units. <p>OBJECTIONS TO THIS OPTION:</p> <ul style="list-style-type: none"> • Support for a lower number of jobs as infrastructure and the character of city cannot cope with even lowest level of growth; • The Council should adopt an aspirational target and fulfil Cambridge's potential as a globally significant high tech cluster; • Use longer-term employment trends as historic data unreliable.
Option 7:	ARGUMENTS IN SUPPORT OF THIS OPTION:

<p>Plan for 15,000 new jobs to 2031</p> <p>Support = 13 Object = 19</p>	<ul style="list-style-type: none"> • Most realistic assessment of job creation; • A reasonable balance; • No more than 15,000 unless the infrastructure is improved; • The Council should identify space for these jobs; • Support for at least the same level of job growth as the past; • Supports existing economic plans for Cambridge. <p>OBJECTIONS TO THIS OPTION:</p> <ul style="list-style-type: none"> • Infrastructure and the character of city cannot cope with higher levels of growth; • More jobs means more homes are needed; • Would damage the character and environment of the city; • Encourage jobs growth elsewhere, in areas where they are more needed; • Too high, unrealistic; • Too many people; • The Council should adopt an aspirational target and fulfil Cambridge's potential as a globally significant high tech cluster; • Future employment may not recover to pre-2000 levels; • The state of the global economy means these forecasts are unrealistic.
<p>Option 8: Plan for 20,000 new jobs to 2031</p> <p>Support = 3 Object = 21</p>	<p>ARGUMENTS IN SUPPORT OF THIS OPTION:</p> <ul style="list-style-type: none"> • Will proactively drive and support sustainable economic development; • The Council should adopt an aspirational target and fulfil Cambridge's potential as a globally significant high tech cluster. <p>OBJECTIONS TO THIS OPTION:</p> <ul style="list-style-type: none"> • Infrastructure and the character of city cannot cope with higher levels of growth; • More jobs means more homes are needed; • Would damage the character and environment of the city; • Encourage jobs growth elsewhere, in areas where they are more needed; • Impact on commuting and congestion; • Future employment may not recover to pre-2000 levels; • Does not go far enough to support the Cambridge economy; • The state of the global economy means higher forecasts are unrealistic; • Would require Green Belt changes.

Option 9: Development within the urban area of Cambridge City Council:

<p>Number of Supports = 13 Number of Objections = 79</p>	
<p>Option 9: Development within Urban Area of Cambridge</p>	<ul style="list-style-type: none"> • Support for this approach as it supports a higher density, sustainable city; • Prioritise new development towards brownfield sites in order to preserve the Green Belt; • Land for the 2,060 new homes should be allocated for new employment with new homes focussed towards SCDC; • Suggestion that the Council has over-estimated SHLAA capacity within the

existing built up area of the city and as such land will need to be released from Green Belt to meet housing need.

ISSUE: GREEN BELT SITES

BROAD LOCATIONS FOR DEVELOPMENT (CAMBRIDGE CITY COUNCIL. ISSUES AND OPTIONS (2012) REPORT AND SOUTH CAMBRIDGESHIRE DISTRICT COUNCIL ISSUES AND OPTIONS 1 REPORT)

Cambridge City Council, South Cambridgeshire District Council Issue and Options Consultation on Broad Locations in the Green Belt	
Question / options no.	SUMMARY OF REPS
<p>1. Land to the North and South of Barton Road (including land in both districts)</p> <p>City: Support: 4 Object: 91</p> <p>SCDC: Support:5 Object: 53 Comment: 6</p>	<p>ARGUMENTS IN SUPPORT:</p> <ul style="list-style-type: none"> • The release of sensitive Green Belt land around Cambridge is not unprecedented e.g. North West Cambridge; • Suitable site for residential development with employment, shops, schools, services and open space provision (including a wildlife reserve and country park); • Could help meet development needs of Cambridge area including for affordable housing, such need has been exacerbated by the lack of development at Cambridge East; • Close to West Cambridge, housing development here would complement its employment floorspace; • The location would encourage sustainable modes of transport; • Low density, well landscaped, sensitive and high quality development acceptable. <p>OBJECTIONS:</p> <ul style="list-style-type: none"> • No exceptional case exists to justify more Green Belt development; • Substantial Green Belt release has only recently been sanctioned so further release should not be contemplated. There should be a settling in period of at least 10 years to allow for the impact of current developments on the edge of Cambridge to be assessed; • No need for development here, development can be accommodated elsewhere in Cambridge and South Cambridgeshire (in the City, at new settlements and in villages); • The land is in a highly sensitive area of the Green Belt, which is important to the setting of the city and adjacent conservation area and forms an important approach to the city. Forms a vital part of the Quarter to Six Quadrant; • Forms part of the wider setting of the historic core of Cambridge and the large number of highly graded listed

	<p>buildings within the core;</p> <ul style="list-style-type: none"> • The site contains the remnants of the West Field and almost certainly contains archaeological remains dating at least as far back as the Roman occupation. New development would detract from the historic character of Cambridge; • Would destroy the last remaining vista of the historic core and the last remaining stretch of road into Cambridge not subject to urban sprawl; • The area is important for wildlife, including threatened species; • The area should not be designated for housing but for playing fields and recreation; • Harmful to Green Belt purpose of protecting the character and setting of a historic city, development in Green Belt villages would be less harmful • Part of setting for Grantchester Meadows and Coton Country Park • Loss of a green lung for Cambridge which is easy to access on foot; • Loss of recreation facilities contrary to NPPF; • Would bring development closer to necklace villages; • Inadequate road infrastructure and capacity, Barton Road already heavily congested; • Development would make it harder to commute into Cambridge by car along Barton Road • Would bring more traffic through Grantchester • Impact on local services and facilities; • Land close to Bin Brook is subject to flooding and development could increase flood risk downstream; • Noise and air quality concerns close to M11; • Inadequate water supply to support development; • Site rejected in the past and nothing has changed to reduce the importance of the area; • Inadequate local infrastructure including schools. <p>COMMENTS:</p> <ul style="list-style-type: none"> • The QTSC should be preserved and enhanced; • A limited area may be possible to develop if well landscaped.
<p>2. Playing Fields off Grantchester Road, Newnham (includes land in both districts)</p> <p>City: Support: 1 Object: 69</p> <p>SCDC: Support:2 Object: 47</p>	<p>ARGUMENTS IN SUPPORT:</p> <ul style="list-style-type: none"> • Could help meet development needs of Cambridge; • Low density, well landscaped, sensitive and high quality development acceptable. <p>OBJECTIONS:</p> <ul style="list-style-type: none"> • No exceptional case exists to justify more Green Belt development; • Substantial Green Belt release has only recently been sanctioned so further release should not be contemplated. There should be a settling in period of at least 10 years to allow for the impact of current

<p>Comment: 4</p>	<p>developments on the edge of Cambridge to be assessed;</p> <ul style="list-style-type: none"> • No need for development here, development can be accommodated elsewhere in Cambridge and South Cambridgeshire (in the City, at new settlements and in villages) • New development would detract from the historic character of Cambridge • Harmful to Green Belt purpose of protecting the character and setting of a historic city, development in Green Belt villages would be less harmful; • The land is in a highly sensitive area of the Green Belt, which is important to the setting of the city and adjacent conservation area and forms an important approach to the city. Forms a vital part of the Quarter to Six Quadrant; • Would bring development closer to Grantchester • TOWARDS 2031 ISSUES Impact on Grantchester Meadows; • Would lead to the loss of a green finger running into the centre of Cambridge; • Impact on local services and amenities; • Inadequate road infrastructure and capacity, Grantchester Road inadequate; • Would bring more traffic through Grantchester; • Could lead to the loss of the allotments, which represent an important facility for the community; • Would destroy the village feel of Newnham; • Would lead to unacceptable levels of traffic on Barton Road and Fen Causeway which are already heavily congested; • Development would make it harder to commute into Cambridge by car along Barton Road; • Flood risk to rugby club land, development could exacerbate flooding to neighbouring properties; • Inadequate water supply to support development; • Could increase flood risk downstream; • Inadequate road infrastructure and capacity; • Loss of playing fields should be resisted and is contrary to the NPPF; • The area is important for wildlife, including threatened species. The site forms an important wildlife corridor linking to the Backs and Grantchester Meadows; • Development of this site has been rejected in the past, and the reasons for this remain unchanged. <p>COMMENTS:</p> <ul style="list-style-type: none"> • The QTSC should be preserved and enhanced; • Perhaps a small development away from the River would be acceptable.
<p>3. Land West of Trumpington Road (includes land in</p>	<p>ARGUMENTS IN SUPPORT:</p> <ul style="list-style-type: none"> • Could help meet development needs of Cambridge; • Well landscaped, sensitive and high quality development

<p>Cambridge only)</p> <p>City: Support: 1 Object: 64</p> <p>SCDC: Support:3 Object: 43 Comment: 3</p>	<p>acceptable if away from river.</p> <p>OBJECTIONS:</p> <ul style="list-style-type: none"> • No exceptional case exists to justify more Green Belt development; • The area forms a sensitive part of the Green Belt and should remain as such. It plays a very important part in the overall setting of the city and its rural edge is a vital characteristic of Cambridge that should be protected; • No need for development here, development can be accommodated elsewhere in Cambridge and South Cambridgeshire (in the City, at new settlements and in villages); and have a negative impact on the Southacre Conservation Area; • New development would detract from the historic character of Cambridge; • Harmful to Green Belt purpose of protecting the character and setting of a historic city, development in Green Belt villages would be less harmful; • Would impinge on a Green Corridor and add to urban sprawl; • Site assessed previously and rejected, nothing has changed since then to alter that conclusion; • Impact on Grantchester Meadows, important green lung for residents and visitors; • Part of the setting to Grantchester, and Grantchester Meadows; • Loss of playing fields should be resisted and is contrary to the NPPF; • Loss of green separation between Cambridge and Trumpington; • The site forms an important part of the river valley wildlife corridor. The area is important for wildlife, including threatened species; • Development would lead to the loss of high quality agricultural land; • Additional road junctions required by development would damage appearance of tree lined approach to City; • The trees along Trumpington Road form part of a Woodland Wildlife Site; • Inadequate road infrastructure and capacity, Trumpington Road could not cope with the additional traffic generated by the development; • Inadequate water supply to support development; • Could increase flood risk downstream. <p>COMMENTS:</p> <ul style="list-style-type: none"> • The QTSC should be preserved and enhanced
<p>4. Land West of Hauxton Road (includes land in both districts)</p>	<p>ARGUMENTS IN SUPPORT:</p> <ul style="list-style-type: none"> • There are exceptional circumstances; • Would be a sustainable development with 10.49 Ha of

City:
Support: 4
Object: 41

SCDC:
Support: 7
Object: 50
Comment: 4

outdoor sports pitches, 8.65 hectare extension to Trumpington Meadows Country park a community stadium with a capacity of c8,000, indoor sports provision;

- Logical extension to City without compromising neighbouring necklace villages. M11 forms a natural Southern boundary;
- Could help meet development needs of Cambridge;
- Land already compromised by development;
- Well landscaped sensitive development acceptable;
- Good access;
- Minimal landscape impact.

OBJECTIONS:

- No exceptional case exists to justify more Green Belt development;
- No need for development here, development can be accommodated elsewhere in Cambridge and South Cambridgeshire (in the City, at new settlements and in villages);
- New development would detract from the historic character of Cambridge;
- Harmful to Green Belt purpose of protecting the character and setting of a historic city, development in Green Belt villages would be less harmful;
- Development would conflict with the aim of having a "quality edge" on the southern approach to Cambridge;
- Loss of landscaped foreground to the new city edge;
- Highly visible site on rising ground;
- Coalescence with Hauxton / Harston;
- Development would adversely impact on the setting of the adjacent new country park, including Byrons Pool and the river;
- Community Stadium not appropriate in this sensitive gateway location;
- Involves loss of open space needed to form a positive southern boundary to the city, and buffer Trumpington Meadows from the motorway;
- Would erode the amenity value of the Trumpington Meadows country park;
- Inadequate water supply to support development;
- Could increase flood risk downstream;
- Would worsen traffic and make it harder to commute to work;
- Inadequate road infrastructure and capacity;
- Noise and air quality concerns close to M11;
- Noise from the stadium,
- Impact on local services and amenities including schools (Primary school at Trumpington Meadows incapable of extension);
- New retail should be in city centre;
- Allow new development to be completed and settled

	<p>before more is contemplated.</p> <p>COMMENTS:</p> <ul style="list-style-type: none"> • Minor development acceptable; • Broad Location 4 should include the WWTW at Bayer Cropscience; • The QTSC should be preserved & enhanced.
<p>5. Land South of Addenbrooke's Road (includes land in both districts)</p> <p>City: Support: 7 Object: 30</p> <p>SCDC: Support:9 Object: 43 Comment: 5</p>	<p>ARGUMENTS IN SUPPORT:</p> <ul style="list-style-type: none"> • Logical extension to City without compromising neighbouring necklace villages. M11 forms a natural Southern boundary; • Would provide a employment-led, mixed-use neighbourhood in a sustainable location with 45 hectares of office/research and employment development (science park), 1,250 market, affordable and key worker dwellings, local shops and community facilities, a primary school, public open space, strategic landscaping, highways and other supporting infrastructure; • Could help meet development needs of Cambridge; • Would assist the delivery of high levels of employment growth in Cambridge; • Sustainable location high in development sequence established by 2003 Structure Plan; • Good transport network nearby; • Site is available and can be delivered in plan period; • Land already compromised by development, would not harm Green Belt purposes; • Well landscaped sensitive development acceptable; • Would allow for enhancement of nearby habitats and increased access to the countryside; • Yes, provided views maintained and clear separation between development and Great Shelford; • Potential for major growth which has little impact on character / townscape and landscape setting of city. <p>OBJECTIONS:</p> <ul style="list-style-type: none"> • No exceptional case exists to justify more Green Belt development; • No need for development here, development can be accommodated elsewhere in Cambridge and South Cambridgeshire (in the City, at new settlements and in villages); • Allow new development to be completed and settled before more is contemplated, area is already overdeveloped; • Planning inspectors have ruled Addenbrooke's Road is a sensible Green Belt boundary; • New development would detract from the historic character of Cambridge; • Would compromise planned Green Belt edge on Glebe Road; • Development south of Glebe Road rejected in earlier

	<p>plans and nothing has changed since then;</p> <ul style="list-style-type: none"> • Would lead to ribbon development; • Would lead to coalescence with Great Shelford; • Harmful impact on views of Cambridge from the Gogs; • Inadequate road infrastructure and capacity; • Inadequate local school places, services and facilities; • Would worsen traffic and slow ambulances going to Addenbrooke's Hospital; • Noise and air quality concerns close to M11; • Loss of amenity, open spaces and land for walking; • Could increase flood risk downstream. <p>COMMENTS:</p> <ul style="list-style-type: none"> • Not as intrusive as other options • Minor development on non-elevated land would be acceptable • Not too bad, plenty of new housing going on nearby and decent roads • The southern limit of this site would need to be defined with care. If extended too far to the south it could swamp Great Shelford. • This is the better of the options, as it continues on from existing developments. However, it could cause congestion and the transport infrastructure would need to be improved to cope
<p>6. Land South of Addenbrooke's Road between Babraham Road and Shelford Road (includes land in both districts)</p> <p>City: Support: 4 Object: 35</p> <p>SCDC: Support:6 Object: 37 Comment: 3</p>	<p>ARGUMENTS IN SUPPORT:</p> <ul style="list-style-type: none"> • Logical extension to City without compromising neighbouring necklace villages; • Could help meet development needs of Cambridge including affordable homes; • Would deliver new infrastructure to help serve existing uses; • Well landscaped sensitive development acceptable; • Yes, provided views maintained and clear separation between development and Great Shelford. <p>OBJECTIONS:</p> <ul style="list-style-type: none"> • No exceptional case exists to justify more Green Belt development; • No need for development here, development can be accommodated elsewhere in Cambridge and South Cambridgeshire (in the City, at new settlements and in villages); • New development would detract from the historic character of Cambridge; • Would lead to coalescence with Great Shelford; • Harmful to Green Belt purpose of protecting the character and setting of a historic city, development in Green Belt villages would be less harmful; • No development south of the Addenbrooke's Access Road which is a clear Green belt boundary; • Undermine the new planned edge for the city;

	<ul style="list-style-type: none"> • Would create an isolated new community; • Used for recreation, important to preserve the unspoiled view of White Hill; • Harmful to views from the Gogs and Wandlebury; • Development should not encroach upon Nine Wells and to the land on either side of Granhams Road, which has landscape value; • Inadequate road infrastructure and capacity; • Would worsen traffic and slow ambulances going to Addenbrooke's Hospital; • Could constrain long term growth of the Biomedical Campus; • Would lead to ribbon development distant from existing communities; • Inadequate local school places, services and facilities; • Inadequate local school places, services and facilities; • Damage to biodiversity and Nine Wells Local Nature Reserve. <p>COMMENTS:</p> <ul style="list-style-type: none"> • Not as intrusive as other options; • Minor development on non-elevated land would be acceptable; • Area between Shelford Road and Babraham Road is of high value landscape. Some small areas to the rear of Shelford Road could be developed with a tree belt edge continuing the boundary of the Clay Farm 'green wedge'.
<p>7. Land between Babraham Road and Fulbourn Road (includes land in both districts)</p> <p>City: Support: 5 Object: 38</p> <p>SCDC: Support:6 Object: 69 Comment: 3</p>	<p>ARGUMENTS IN SUPPORT:</p> <ul style="list-style-type: none"> • Logical extension to City without compromising neighbouring necklace villages; • Could help meet housing and employment development needs of Cambridge; • Deliverable in plan period; • Could provide for up to 4,000 new homes in a sustainable location close to the jobs at the Addenbrooke's Hospital, Marshalls and ARM; • Would allow for expansion of Peterhouse Technology Park; • Can provide significant open space and recreation areas; • Well landscaped sensitive development acceptable; • Already compromised; • Could minimise the starkness of Addenbrooke's; • Low lying land development would have less impact. <p>OBJECTIONS:</p> <ul style="list-style-type: none"> • No exceptional case exists to justify more Green Belt development; • No need for development here, development can be accommodated elsewhere in Cambridge and South Cambridgeshire (in the City, at new settlements and in villages); • Harmful to Green Belt purpose of protecting the character

	<p>and setting of a historic city, development in Green Belt villages would be less harmful;</p> <ul style="list-style-type: none"> • New development would detract from the historic character of Cambridge; • Very important to the special character and setting of Cambridge as elevated with important views; • Majority of land is elevated with important views - development could not easily be screened from other vantage points; • Worts' Causeway and minor road over hill towards Fulbourn provide a well-used route for leisure access to countryside and development along this corridor would have a significant negative impact; • Harmful to setting and character of Fulbourn; • Contrary to the conclusions of earlier Green Belt studies and to those of the Inspector when considering proposals for housing at Netherhall Farm in 2006; • Important for amenity and recreation; • Impact on tranquillity of the countryside; • Impact on traffic; • Harmful to views from the Gogs and Wandlebury and of high landscape value; • Damage to biodiversity and Nature Reserves. <p>COMMENTS:</p> <ul style="list-style-type: none"> • The part of the area either side of Worts' Causeway, which is on level ground, would seem to be the most unobtrusive of all the sites. • Minor development on non-elevated land would be acceptable if the done with sensitivity to preserve the best of the landscape.
<p>8. Land East of Gazelle Way (includes land in South Cambridgeshire only)</p> <p>City: Support: 7 Object: 15</p> <p>SCDC: Support:7 Object: 64 Comment: 6</p>	<p>ARGUMENTS IN SUPPORT:</p> <ul style="list-style-type: none"> • Well landscaped sensitive development acceptable; • Could help meet development needs of Cambridge; • Little impact on character / townscape and landscape setting of city subject to landscape and woodland buffers; • Strong possibility provided a clear (green) corridor retained for Teversham village; • Would not involve views of the historic city; • Well-landscaped sensitive development acceptable. <p>OBJECTIONS:</p> <ul style="list-style-type: none"> • No exceptional case exists to justify more Green Belt development; • No need for development here, development can be accommodated elsewhere in Cambridge and South Cambridgeshire (in the City, at new settlements and in villages); • Harmful to Green Belt purpose of protecting the character and setting of a historic city, development in Green Belt villages would be less harmful; • Loss of countryside, adverse impact on concept of a

	<p>compact city;</p> <ul style="list-style-type: none"> • Loss of rolling agricultural land with good views of Cambridge; • Would reduce the separation of Fulbourn from Cambridge which is already compromised by the Fulbourn and Ida Darwin Hospital sites, and Tesco, making retention of open land to the north more important; • Developing this land would turn Teversham into a suburb of Cambridge and destroy the character of the village; • Impacts of road network, local roads already congested; • Inadequate public transport to support development. <p>COMMENTS:</p> <ul style="list-style-type: none"> • Hard to comment without knowing potential dwelling numbers; • Minimal impact on the setting of the city and good transport links. This would indicate Broad Location 8 as the least worse of the options; • Development would lead to merger with Fulbourn, which should be avoided, however Teversham could be expanded north and eastwards considerably: there is little landscape value in that area.
<p>9. Land at Fen Ditton (includes land in South Cambridgeshire only)</p> <p>City: Support: 4 Object: 22</p> <p>SCDC: Support:9 Object: 43 Comment: 6</p>	<p>ARGUMENTS IN SUPPORT:</p> <ul style="list-style-type: none"> • Sustainable location to provide much needed homes and/or employment for the Cambridge area; • Could provide a foot/cycle bridge over the river Cam to link to the Science Park and the new rail station; • Could help meet development needs of Cambridge including affordable housing; • Development would retain a strategic green edge along A14, thereby preserving openness of immediate area and wider landscaped setting of Cambridge; • Well landscaped sensitive development acceptable; • Little impact on character / townscape and landscape setting of city subject to landscape and woodland buffers. <p>OBJECTIONS:</p> <ul style="list-style-type: none"> • No exceptional case exists to justify more Green Belt development; • No need for development here, development can be accommodated elsewhere in Cambridge and South Cambridgeshire (in the City, at new settlements and in villages); • Fen Ditton is a historic settlement, most of which has been designated a Conservation Area. Additional housing development of any size in this area would subsume Fen Ditton into the city; • Harmful to Green Belt purpose of protecting the character and setting of a historic city, development in (other) Green Belt villages would be less harmful; • Harmful to Green Belt purpose of maintaining rural

	<p>setting of Fen Ditton;</p> <ul style="list-style-type: none"> • Importance of Green Belt has been examined through South Cambridgeshire District Council Local Development Framework and through various planning applications, which have dismissed development as inappropriate. • Negative impact on East Cambridge road network, which is one of the most congested in the city; • Existing public transport links are minimal (2 buses a day) and unable to support an enlarged settlement travelling for employment; • The infrastructure could not support any further development. • Would lead to urban sprawl, Cambridge could accommodate more by building taller; • Inadequate roads and other transport links; • Would lead to congestion, existing traffic bottleneck at the bottom of Ditton Lane at peak times, and bus services are likely to be reduced in near future; • Unsustainable location, the only bus is about to be withdrawn, there is no village shop, the sewage system is overburdened and inadequate, and the B1047 already carries a heavy vehicular load; • Commons on the river corridor are essential open space for the city; • Noise from the A14; • Open and rural nature of land between Chesterton and Fen Ditton is highly prized and has been identified by local and city people as essential open space. <p>COMMENTS:</p> <ul style="list-style-type: none"> • Hard to comment without knowing potential dwelling numbers; • Development might be possible if Fen Ditton village can be adequately protected and significant improvements are made to the transport system • There must be a 'buffer zone' between development and the edge of the River to preserve rural character of the Green Corridor.
<p>10. Land between Huntingdon Road and Histon Road (includes land in South Cambridgeshire only)</p> <p>City: Support: 8 Object: 14</p> <p>SCDC: Support:7 Object: 32</p>	<p>ARGUMENTS IN SUPPORT:</p> <ul style="list-style-type: none"> • Sustainable location for housing and employment development including strategic open space, transport, noise and air quality issues can be mitigated; • Best of the 10 Broad Locations, least effect on the landscape; • Could help meet development needs of Cambridge; • This land is not easily accessed for recreation and too close to the A14 to be really worth keeping as Green Belt; • Well landscaped sensitive development acceptable; • Little impact on character / townscape and landscape setting of city subject to landscape and woodland buffers.

Comment: 5	<p>OBJECTIONS:</p> <ul style="list-style-type: none"> • No exceptional case exists to justify more Green Belt development; • No need for development here, development can be accommodated elsewhere in Cambridge and South Cambridgeshire (in the City, at new settlements and in villages); • This land forms a buffer between the village of Girton and the City, without it Girton could be subsumed as a suburb to the city; • Development would have negative impacts on Girton; • Close to A14 so will not be a pleasant place to live; • Flood risk downstream, site could be used for a reservoir to serve the North-West developments • NIAB and NIAB2 have failed to provide strategic green infrastructure and allocation of this area for development would only compound the short-sighted decisions of the Councils regarding this area; • Loss of green corridor for wildlife. <p>COMMENTS:</p> <ul style="list-style-type: none"> • Hard to comment without knowing potential dwelling numbers; • This should be kept mostly as open space with some low density development;
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CAMBRIDGE LOCAL PLAN – TOWARDS 2031 AND SOUTH CAMBRIDGESHIRE LOCAL PLAN. ISSUES AND OPTIONS 2 PART 1- JOINT CONSULTATION ON DEVELOPMENT STRATEGY AND SITE OPTIONS ON THE EDGE OF CAMBRIDGE

Chapter 9: Site Options

Para Number: 9.1		
Total representations: 3		
Object⁵: 3	Support: 0	Comment: 0
KEY ISSUES ARISING FROM CONSULTATION		
Objections	<ul style="list-style-type: none"> • Erosion of the Green Belt will impact on countryside • technical assessment did not take into account submissions to previous consultation or benefits Broad Location 7 could provide with new employment land and self sustaining services and facilities 	

Para Number: 9.2		
Total representations: 3		
Object¹: 3	Support: 0	Comment: 0
KEY ISSUES ARISING FROM CONSULTATION		

⁵ Object support and comment as allocated in the JDI schedule

Objections	<ul style="list-style-type: none"> • Impact on setting of City • Loss of Green Belt • Criteria used in Council proforma are landscape issues and not relevant to purposes of Green Belt; and assessment doesn't take into account the Commercial Estates Group masterplan • It is not clear how Level 1 and Level 2 conclusions were arrived at
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Para Number: 9.3		
Total representations: 1		
Object⁶: 1	Support: 0	Comment: 0
KEY ISSUES ARISING FROM CONSULTATION		
Objections	<ul style="list-style-type: none"> • Unclear how assessment scores have been aggregated e.g. Green Belt 11 factors into one. 	

Para Number: 9.4		
Total representations: 3		
Object⁷: 3	Support: 0	Comment: 0
KEY ISSUES ARISING FROM CONSULTATION		
Objections	<ul style="list-style-type: none"> • Loss of Green Belt and precedent it creates • Traffic issues Babraham Road • Guided busway not shown on map 2 	

Question 2:		
Total representations: 181		
Object: 95	Support: 14	Comment: 72
EY ISSUES ARISING FROM CONSULTATION		
Objections	<ul style="list-style-type: none"> • Views from Gogs and Beechwoods harmed by GB1 and GB2 but do not object to GB3, GB4 and GB5 • Objections to sites GB1, GB2, and GB3 on ecology grounds and impact on achieving Strategic Green Infrastructure Strategy. See below against these sites. • Will erode attractive countryside leading to Gogs which form important part of setting of City • Object to GB1 GB2 and GB5 loss of precious landscape Robert MacFarlane's "Wild Places" • object to GB1-GB2 as will lead to sprawl and worsen congestion, including parking issues. No objection to GB3-4. Mixed views on GB5 sprawl, visual impact. No objection GB6 • Relieved GB6 smaller than Broad Location10 but too close to Histon Road. Object to use of Green Belt but if justifiable others are least bad options • Protect Green Belt presumption its available destroys its purpose. Oppose GB6 • Oppose GB1 and GB2 as will increase urbanisation of this entrance to City adding to pressure on services and 	

⁶ Object support and comment as allocated in the JDI schedule

⁷ Object support and comment as allocated in the JDI schedule

congestion in southern fringe.

- No “special circumstances” have been put forward to warrant building houses in the Green Belt. They reserve judgement on GB4 and GB5 and would like the Councils to make the case that they do constitute “special circumstances” for providing more employment.
- Site GB6 has significant environmental issues. The technical assessment offers no mitigation of red scores.
- Concern at approach to resist Green Belt releases in absence of objectively assessed needs and GL Hearn submission in relation to Q1 which suggests more housing is needed than that currently proposed by the Councils
- NIAB 3/Darwin Green 3 boundary is incorrect see plan attached to rep 22639
- Barton Road Land Owners Group-Green Belt boundary that would result from these sites would not deliver the long-term clearly defined boundary required in the NPPF. Boundaries do not follow the guidance and will not deliver the quantum of development needed to deliver sustainable development.
- Additional development at GB1 and GB2 and R15 Glebe Farm exacerbates an unsustainable situation in relation to waste management which is a strategic priority in the NPPF
- Opposes all site options. GB3 and GB4 have access issues
- No further growth of any significance can be accommodated on edge of City. SCDC will have to take the burden and Bourn Airfield represents best option in terms of balance jobs and homes.
- Oppose any development in Green Belt at Stapleford
- Use smaller sites in villages. Its up to parish councils to come up with sites
- Netherhall Farm could become an educational resource (urban farm)
- Impact on bee population
- Green Belt must be protected to prevent urban sprawl towards and compromising the character of necklace villages
- Loss of Green Belt creates a precedent
- Area around Gogs has great historical interest and natural beauty and should be protected.
- Impact on quality of life if use Green Belt
- There is identifiable harm to Green Belt purposes by all sites put forward
- The NPPF provides for Green Belt boundaries to be changed only in exceptional circumstances
- Housing and economy don't require exceptional circumstances. 95% of City's 14,000 projected housing need met by consents allocations and SHLAA sites
- Not worth going into Green Belt for such a small number of sites

	<ul style="list-style-type: none"> • • Ecological impacts on rare species who thrive on existing enclosed farmland, reduced resistance to pests and impact on UK agricultural policy • Density will preclude providing amenities on site causing residents to jump into cars • Other good alternatives exist to meet targets including infill in villages, opportunity at Bourne Airfield, Northstowe, Cambourne, Waterbeach and on other sites on southern fringe.
Support	<ul style="list-style-type: none"> • Support for housing provided avoids the AQMA area and use latter for employment. • Commercial Estates Group support GB1, GB2, GB3, GB4 and GB5 but consider a larger area within Broad Location 7 could be considered. • Will help meet demand for affordable homes • Small size and location will have negligible impact on Green Belt and will help meet housing needs • Sites are accessible by public transport and bicycle • Support GB1-GB3 for residential and GB4, GB5, and GB6 for employment • Sites are close to employment and services • Add to outside boundary of Green Belt to compensate
Comment	<ul style="list-style-type: none"> • Impact on setting of BLI's on GB1; GB1 should be developed before GB2 is commenced. Plan for appropriate treatment of eastern boundary. GB3 and GB4 are modest and align with technology park. Treat southern boundary carefully. GB5 impacts on Green Belt and Fulbourn Hospital Conservation Area. GB6 won't harm setting of Cambridge and can allow for robust landscape corridor. CS1 Abbey Stadium preferred option on grounds of not damaging the integrity of the Green Belt. Are cautious about Green Belt removal but at least work undertaken has identified those sites having least impact on Green Belt and setting • Green Belt release is not sequentially preferred to Denny St Francis proposal. All cause harm particularly GB6 • Welcome fact that some of plans to develop on green belt have been dropped. • Concerned over impact of GB1-GB5 on local nature reserves and sprawl damaging setting of City. GB3-GB5 of most concern because of dangers to cyclists and pedestrians and traffic congestion on busy narrow roads. • Keep GB3-GB5 for employment. GB6 not suited to housing • Emphasis should be on new settlements rather than edge of Cambridge • recognise need for practical housing strategy. Congestion on southern approach routes needs tackling. • Given concentration of over 30 villages feeding onto the B1049 and A1307 Milton Rd and Madingley Rd P&R sites are not accessible to these villages • All sites lend themselves to expansion. A14 and M11

	provide barrier to future expansion <ul style="list-style-type: none"> • Sites will not deliver quantum of development needed
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Question 3:

Total representations: 57

Object: 14 Support: 31 Comment: 12

KEY ISSUES ARISING FROM CONSULTATION

Objections	<ul style="list-style-type: none"> • rejects the Council’s assessment of Grange Farm site in the light of the need to address objectively assessed needs, the scale and character of the site having regard to its sustainable location on the edge of Cambridge. The College’s vision is to develop the eastern part of the site and provide significant open space to the west. They therefore do not accept there would be any impact on coalescence. Dominant features in this area include the West Cambridge Site, which has changed the character of the area and forms an abrupt edge. There are two green corridors into west Cambridge but this northern one is bounded by modern development on the West Cambridge site. Vehicular access could be gained from Clerk Maxwell Road. Council is pre-empting the results of technical studies of air quality near the M11. • Barton Road Land Owners Group-believe land north and south of Barton Rd should be released for development in accordance with principles in the concept Master Plan. A strategy of dispersal is unsustainable. The scale of affordable housing need and the need to support the economy justify releasing more land on the edge of Cambridge to support the University and Colleges and research institutions in a sustainable location. Evidence to reject the sites was not robust. A number of supporting technical documents supported reps at Issues and Options Stage which have informed the production of a concept Master Plan to provide 1500 dwellings a small science park, local centre, a school, relocated sports pitches for colleges, green infrastructure and access roads. There are process issues in the timing of decisions to reject sites while the quantum of development has not been finalised which is procedurally unsound. GL Hearn’s Housing Requirements Study for BRLOG concludes an objectively assessed housing requirement would require 43,800-46,000 homes 2011-2031. 19,000 in Cambridge and 25,300 in SCDC. Experience with Rushcliffe Core Strategy and elsewhere highlights importance of an up to date SHMA in identifying housing need. The need for a long-term supply of land was highlighted in examination of Dacorum’s Core Strategy. The Structure Plan Green Belt releases were only meant to provide land to 2016. Sites shouldn’t have been assessed before the quantum of land needed is identified. If Cambridge East does not come forward in the plan period alternative locations should be considered. The Green Belt is tightly drawn and doesn’t allow for any safeguarded land to meet longer-term needs.
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The approach taken is not justified in line with PAS guidance. In relation to a credible evidence base, consideration of reasonable alternatives, and how they perform. The evidence used to reject the site is not robust, and the proposed strategy is not justified and is likely to be found unsound unless early and material changes are made. The decision to reject the site also not legally compliant on basis that reps made to Issues and Options One have been ignored (Regulation 18(3) of 2012 Regs) given they promoted a reasonable alternative.

- Commercial Estates Group-The summary assessment of BL7 is flawed as it did not take into account the detailed submissions to a previous consultation in particular the scope for the development to provide self-sustaining services. No overarching SA has been undertaken to look at the implications of the current development strategy before considering any departure. The assessment of impact against the Air Safeguarding Zone is flawed in that it represents a consultation zone with airport authorities. The site has been classified as not having access to high quality public transport even though it is close to the park and ride and has poor cycle access. The assessment of Green Belt in Chapter 7 is skewed in significance of the contribution BL7 makes to green belt purposes.
- Cambridge South Consortium-The consultation document is not sound as it is not based on objectively assessed needs, the draft plan is not justified –fundamental background technical work has not been carried out. The draft plan is not the most appropriate strategy-there has been no strategic assessment of development on the edge of Cambridge. Joint working has not addressed cross boundary delivery of housing and employment. The draft plan is not consistent with national policy. BL5 has been incorrectly assessed as a housing site despite reps to both council's as part of Issues and Options One for an employment led scheme comprising a 45ha science park and 1,250 homes. This would have led to a better scoring of the site. The green belt and SA assessment included criteria such as views green corridors and soft green edges, which are not relevant to SA, and has resulted in double counting. They have commented further in the Green Belt Critique and Critique of Interim SA. The allocation for and employment led mixed use scheme will have a number of benefits. City can be expanded in a sustainable way, access to good public transport, employment, rail station, Addenbrookes. It would not harm the Green Belt. It would create jobs and benefit the economy, provide 1250 homes including 500 affordable homes to meet ongoing needs beyond 2021. Provide a new focus of R&D development to the south related to a new sustainable community. Would meet all NPPF sustainability objectives.
- MCA Developments Ltd-have no objection to a new

	<p>Community Stadium at Bourne Airfield provided it is commercially viable in its own right and is not used as catalyst for a large scale housing allocation on an unsustainable site.</p> <ul style="list-style-type: none"> • Carter Jonas (4412) and the Quy Estate (2918)-Object to the rejection of BL9. It is an appropriate location is suitable viable and deliverable. The Council has underestimated the opportunity provided by the Science Park Station and Chisholm Trail. Inner Green Belt Review has not taken into account that this development will keep a green wedge between the development and the A14. Development by Marshall north of Newmarket Rd will fall short of anticipated delivery. It would redress the growth imbalance between SW Cambridge and NE Cambridge.
<p>Support</p>	<ul style="list-style-type: none"> • strongly support for rejection of BL1, BL2, BL3, BL4 and BL5 in the light of their Quarter To Six Quadrant vision document. • Trumpington Residents Association-Supports the Council's conclusions on the remaining sites in the Green Belt around Trumpington. They offer additional reasons supporting the rejection of BL3-BL6 • Cambridge Past Present and Future-Supports the rejections proposed in each Broad Location and acknowledges the great importance attached to them by the Councils. They do not however regard the Green Belt as sacrosanct and there may be special reasons to allow exceptions such as maintaining a balanced portfolio of sites to retain and attract a knowledge-based firms. This could constitute a very special circumstance. • Southacre Latham Rd and Chaucer Road Residents Association-support the rejections of sites in BL1 BL3 and BL4 and BL5. Sites are used by the community. Around Trumpington sites are visible from the M11 and impact on the identity of Trumpington as a village. • A further 7 Parish Council's supported the Council's reasons for rejection of edge of City Green Belt sites • Boyer Planning-RLW/DIO support rejection of other possible Green Belt sites in Appendix 4 • Cllr Anthony Orgee and Cllr Gail Kenney-Supports the rejection of all sites in Appendix 4 because of their impact on Green Belt and for the other reasons given. • Hinxton Land Ltd-Councils are correct to dismiss all sites listed • Welcome rejection of BL1 sites due to loss of playing fields and open fields, BL3 sites due to loss of Lakes congestion and playing fields, and BL4 and BL5 due to setting of City • Strongly support rejection of BL1 and BL2 in light of importance of these locations • Need to retain Green Belt around Girton • Endorse reasons for rejection but criteria applied in subjective way and could equally be used to reject GB1 and GB2

	<ul style="list-style-type: none"> • Support rejections in BL3-5 • City has rightly rejected sites that would aggravate flooding issues. Use of playing fields must be stopped there is not enough open space to replace them. • Support rejection of BL1 which would damage setting of the University city as well as views. • Strongly support the rejection of Site 911 in BL7. • Support all rejections there are no exceptional circumstances •
Comment	<ul style="list-style-type: none"> • English Heritage-Sites in BL1 and BL2 and BL3 are all very sensitive and important to the setting of the historic core of the City. The historic skyline is clearly visible from the western approaches. The inner boundary should be regarded as permanent • English Heritage-BL4 is important for reasons set out in our objections to the Community Stadium. The current Green Belt Boundary was reviewed when Trumpington Meadows was allocated. At the time it was widely agreed to buffer the new edge away from the motorway • English Heritage- BL5 The new Addenbrookes access road forms a logical boundary in this location as accepted by the Inspector at the Waste Recycling Facility Inquiry. Would lead to coalescence with Gt Shelford and Stapleford and harm the character of both villages. • English Heritage-BL6 and BL7. The proposed allocations GB1-5 provide only modest erosion into the Green Belt in this vicinity. Larger scale incursions would be harmful to the purpose of Green Belt. • English Heritage-BL9 in spite of its close proximity Fen Ditton retains a distinct identity with clear and discernable character of a small Cambridgeshire village. Allocation of any of the sites would harm the setting of many heritage assets within it. • Support rejection of Barton Road sites which would have adverse impact on very sensitive Green Belt • Would encourage re-assessment as it is more sustainable to develop close to City • Bottom line is we will be back here discussing these sites again within 10 years and some will have to go green especially if the airport site is locked out.

Site Number: GB1		
Total representations: 292		
Object: 250	Support: 25	Comment: 17

KEY ISSUES ARISING FROM CONSULTATION	
Objections GB1 (number of similar comments in brackets)	Green Belt <ul style="list-style-type: none"> • Loss of Green belt /creates precedent (10) • If Green Belt is used it can never be replaced (2) • Cumulative impact of loss this and other green belt land

represents a 30% loss (1)

- It will cause fundamental harm/impact upon the green belt (77)
- Unjustified breach of Green Belt policy (5)
- There is a wrongful assertion that GB1 and 2 are of low environmental value. The NPPF doesn't discriminate in this way.(1)
- NPPF Para 83 provides for Green Belt boundary changes only in "exceptional circumstances" The Council has not presented a compelling case as to why this constitutes exceptional circumstances (10)
- Needs of economy don't require exceptional circumstances (1)
- Contravenes stated purpose of Green Belt as defined in NPPF in failing to check unrestricted sprawl, safeguarding the countryside from urban encroachment, which would further contribute to the destruction of the special character of an historic town. (2)
- Area was not allowed to be developed in 2002 LDA Green Belt Boundary Study (1)
- Reasons for designating it Green Belt have not changed (3)
- Further attempts to move green belt boundaries will be subject to legal challenge (1)
- This area must be the highest value Green Belt and is vital for keeping Cambridge attractive and compact. (4)
- Object to development in green belt but site has minimal impact and good access to local services (1)
- This is arguably the best landscape in the City (3)
- It is the landscape which makes City attractive not its housing estates (1)
- Will run risk of unrestricted sprawl extending/encroaching upon open countryside beyond this site toward the Gogs (45)
- Area forms important visual and physical buffer between urban edge and higher ground (71)
- Soft green edge works and should not be compromised (34)
- The development of these forelands will destroy the iconic status of area (1)
- Represents an unspoilt gateway to open countryside even a small number of dwellings will change this ambience (1)
- Land at base of Gogs is visually important and contributes to setting of City when viewed from south (1)
- As you come over the hill the City appears and is largely unspoilt (1)
- The Gogs are the only hilly feature in an otherwise singularly flat landscape (1)
- Impact on views of Beech Woods (6)
- Impact on views from and to the Gogs (8 + 1)
- Paths provide safe access to Beech Woods and the highest public space in Cambridge (1)

- Impact on views across Cambridge (11)
- Visual impact will differ vastly from what is there now (2)
- Impact on setting of Cambridge (7)
- Development of Green Belt will lead to coalescence of villages which would lose their identify (3)
- The integrity of necklace villages should be preserved at all costs and they should not be subsumed into the City (1)
- Will destroy City's historic compact scale (1)
- Green belt must remain for physical, emotional, mental and spiritual health as well as environmental reasons (6)
- Building in the green belt will harm the attractiveness of Cambridge and thereby hamper economic growth (5)
- Sir William Wort gifted this land in perpetuity in 1709 so that Cambridge scholars could be coaxed into the countryside and enjoy the view (1)
- Green Belt should be more valuable and protected as population of our small city densifies (2)
- Impact of other housing on outskirts of Cambridge has yet to be evaluated (1)
- The Council's 2012 Green Belt Review comments at para 3.4 "that where the city is viewed from higher ground or generally has open aspects...it cannot accommodate change easily" This is a clear instance of a view from higher ground.
- The area is important for passive recreation

Natural Environment Biodiversity

- will have unacceptable adverse impact on the local ecological network including SSSI's, County and City Wildlife sites and will compromise the ability to achieve the Gog Magogs Strategic Green Infrastructure Scheme. The Council's Assessment has underplayed impacts on natural environment and biodiversity in particular. They take issue with the assessment scores for GB1 re the scope for mitigation of impacts upon Netherhall Farm Meadow (County Wildlife site). To assume mitigation might be possible is arrogant. Reassessing GB1 could result in scores changing from amber to red in which case site should not be developed. They also question the Council's score on impact on an SSSI. This should not be green as traffic levels on LimeKiln Hill are already damaging the SSSI. Any increase would pose a real threat.

Pollution

- Will create air, noise, and light pollution (9)
- Addenbrookes incinerator requires open areas nearby (1)
- This Green Belt Land is a valuable part of the City's heritage visually and also with wildlife sheltered from noise and light pollution. Any partial development would have a knock-on effect on the northern part of the GB1

	<p>site. (1)</p> <p>Loss Agricultural Land</p> <ul style="list-style-type: none"> • Would destroy productive arable land (21) • Permission for conversion of barns on site to dwellings granted in 2012 subject to surrounding land remaining open and of agricultural appearance (1) <p>Traffic Issues</p> <ul style="list-style-type: none"> • Transport infrastructure in this area cannot cope with additional development • Doesn't feel it is possible to assess these sites options without a set of traffic options (which could be met within budget limits) alongside an assessment of the impact on the local network (1) <p>Infrastructure</p> <ul style="list-style-type: none"> • Lack of local amenities and social infrastructure including schools and doctors surgeries; • flooding risk on lower land (1) <p>Alternative locations</p> <ul style="list-style-type: none"> • Consider Marshalls land instead (2) • Consider Waterbeach or Northstowe instead (7) • With all other sites in City and at Marshalls no need to further urbanisation. Need more balance (1) • Expand selected villages and new settlements instead (37) • In view of Northstowe going ahead the balance is against building on any Green Belt land around Cambridge (1) • Focus on other brownfield sites instead (11)
<p>Support GB1 (number of similar comments in brackets)</p>	<ul style="list-style-type: none"> • Fills a natural corner that lends itself to the purpose (1) • Provides a reasonable choice provided it doesn't spread nearer the Beechwoods (1) • Sites are suitable for residential development agree with arguments in favour (1) • Site appears to be well connected (1) • More homes are needed close to Addenbrookes (1) • Proximity to Park and Ride, Addenbrookes, and Guided Bus and Science Parks. (3) • Visually satisfactory (1) • Limited green belt development in established settlement may be appropriate (1) • Site accessible by public transport and bicycle and close to employment and services. Preferable to village locations where it adds to commuting/pollution/congestion/environmental impact (1) • Support on basis green belt setting is not compromised (2)

	<ul style="list-style-type: none"> • Development here would be beneficial (1) • Support as not as congested as area as Fulbourn Road (1) • Large developments should be kept close to Cambridge City (1) • Site could be extended to Junction of Worts Causeway and Lime Kiln Road (2) • Support as it would only extend existing built up areas (1) • Proximity to centres of employment, good public transport, schools and facilities thereby putting minimum strain on road congestion (1)
Comment	<ul style="list-style-type: none"> • Favour Worts Causeway sites because they wouldn't fundamentally change the nature of that part of the Cambridge boundary, visually or functionally (1) • Development here seems practical and has minimal impact (1) • English Heritage- The curved alignment of Beaumont Road will ensure that to some extent this allocation will give the appearance of 'rounding off' the city edge, though the eastern boundary might then have taken a more northeast-southwest alignment up to the track that forms the western boundary of the large field, whereas the current north-south alignment appears better suited to justifying the allocation of site GB2. We note the site includes locally listed farm buildings and while these might be retained, their setting is likely to be compromised by the allocation. It will therefore be necessary to consider whether or not there is sufficient wider public benefit to be derived from this allocation to justify the harm. The eastern boundary would need careful treatment to form an appropriate junction between the city and the Green Belt.

Site Number: GB2		
Total representations: 284		
Object: 240	Support: 26	Comment: 18

KEY ISSUES ARISING FROM CONSULTATION	
Objections GB2	<p>Green Belt</p> <ul style="list-style-type: none"> • Loss of Green belt /creates precedent (43) • Cumulative impact of loss this and other green belt land represents a 30% loss (1) • It will cause fundamental harm/impact upon the green belt (73) • Serious impact on Green Belt but less than GB1 since land is flat (1) • Unjustified breach of Green Belt policy (6) • There is a wrongful assertion that GB1 and 2 are of low environmental value. The NPPF doesn't discriminate in

this way.(3)

- NPPF Para 83 provides for Green Belt boundary changes only in “exceptional circumstances” The Council has not presented a compelling case as to why this constitutes exceptional circumstances (9)
- Building in the green belt will harm the attractiveness of Cambridge and thereby hamper economic growth (4)
- Contravenes stated purpose of Green Belt as defined in NPPF in failing to check unrestricted sprawl, safeguarding the countryside from urban encroachment, which would further contribute to the destruction of the special character of an historic town. (8)
- Area was not allowed to be developed in 2002 LDA Green Belt Boundary Study (1)
- Reasons for designating it Green Belt have not changed (5)
- Object to green belt development but if absolutely required this site has minimal impact and good access to local services and employment. (1)
- Scores for green belt significance questionable in 2012 document as they relate to two halves of same field (1)
- Keep Green Belt for future generations to enjoy (1)
- Green belt has prevented ribbon development (2)
- This is arguably the best landscape in the City (1)
- Will run risk of unrestricted sprawl extending/ encroaching upon open countryside beyond this site toward the Gogs (40)
- Support the rejection of Site 911 Cambridge SE but same criteria apply to GB1 and GB2 (1)
- Area forms important visual and physical buffer between urban edge and higher ground (67)
- Soft green edge works and should not be compromised (33)
- The development of these forelands will destroy the iconic status of area (1)
- Represents an unspoilt gateway to open countryside even a small number of dwellings will change this ambience (2)
- Land at base of Gogs is visually important and contributes to setting of City when viewed from south (1)
- As you come over the hill the City appears and is largely unspoilt 1)
- The Gogs are the only hilly feature in an otherwise singularly flat landscape (1)
- Impact on views of Beech Woods (1)
- Impact on views from Gogs (5)
- Impact on views of Gogs (4)
- New developments will be visible all way into Cambridge from south (1)
- Development of Green Belt will lead to coalescence of villages which would lose their identify (4)
- The integrity of necklace villages should be preserved at all costs and they should not be subsumed into the City.

(1)

- Green belt must remain for physical, emotional, mental and spiritual health as well as environmental reasons (2)
- Sir William Wort gifted this land in perpetuity in 1709 so that Cambridge scholars of Emmanuel College could be coaxed into the countryside and enjoy the view (1)
- Green Belt should be more valuable and protected as population of our small city densifies (1)
- Impact of other housing on outskirts of Cambridge has yet to be evaluated (1)
- Land off Long Road should never have been taken out of the Green Belt (1)
- Green Belt should never be reviewed? (3)
- The Council's 2012 Green Belt Review comments at para 3.4 "that where the city is viewed from higher ground or generally has open aspects...it cannot accommodate change easily" This is a clear instance of a view from higher ground. (2)

Natural Environment Biodiversity

- will have unacceptable adverse impact on the local ecological network including SSSI's, County and City Wildlife sites and will compromise the ability to achieve the Gog Magogs Strategic Green Infrastructure Scheme. The Council's Assessment has underplayed impacts on natural environment and biodiversity in particular. Reassessing GB2 could result in scores changing from amber to red in which case site should not be developed. They also question the Council's score on impact on an SSSI. This should not be green as traffic levels on LimeKiln Hill are already damaging the SSSI. Any increase would pose a real threat. Some of the scores against Green Belt on GB2 also underplay impacts and may be categorised red or amber. Cumulative scores may end up being changed amber to red. (66)

Pollution

- Will create air, noise, and light pollution (9)

Loss Agricultural Land

- Would destroy productive arable land (18)

A number of attractive permissive footpath links are threatened by the proposed development along with impacts on biodiversity and the loss of safe attractive off road routes to Beech Woods and the Park & Ride.

Traffic Issues

- Transport infrastructure in this area cannot cope with further development

Infrastructure

- Lack of local amenities and social infrastructure including

	<p>schools and doctors surgeries;</p> <p>Alternative Locations</p> <ul style="list-style-type: none"> • Consider Marshalls land instead (2) • Consider Waterbeach or Northstowe instead (10) • Expand selected villages and new settlements instead (33) • Focus on other brownfield sites instead (12) <p>Other Reasons</p> <ul style="list-style-type: none"> • There is a GHQ Line Anti tank trench running across the GB1 and GB2 sites which presents contaminated land issues and cultural heritage /archaeological issues and historic monument of national and regional importance requiring a risk evaluation under the Environmental Protection Act 1990 (1) • Area is important for passive recreation (50)
<p>Support GB2 (number of similar comments in brackets)</p>	<ul style="list-style-type: none"> • Fills a natural corner that lends itself to the purpose (1) • Provides a reasonable choice provided it doesn't spread nearer the Beechwoods (1) • Sites are suitable for residential development agree with arguments in favour (1) • Most sites look suitable for housing (1) • Proximity to Park and Ride, Addenbrookes, guided bus, Science Parks, and rail station to be built at Long Road (1) • Visually satisfactory (1) • Limited green belt development in established settlement may be appropriate (1) • Site accessible by public transport and bicycle and close to employment and services. Preferable to village locations where it adds to commuting/pollution/congestion/environmental impact (1) • Support on basis green belt setting is not compromised (2) • Development here would be beneficial but Cambridge still needs infrastructure to overcome congestion (1) • Support as not as congested as area as Fulbourn Road (1) • Support as it would only extend existing built up areas (1) • Proximity to centres of employment, good public transport, schools and facilities thereby putting minimum strain on road congestion (1) • Support if site includes significant green space to moderate impact of Addenbrookes from the Gogs (1) • Support but traffic along Babraham Rd needs to be addressed first (1) • Support development of site which is logical extension to Cambridge with minimal impact on green belt. It is a sustainable location. Site is available and can be

	<p>developed independently or as part of larger phased scheme. It is unconstrained by infrastructure capacity and is unlikely to have contamination issues. Background evidence supports its development and is endorsed by the County Council. Offers potential for provision of affordable housing.</p>
Comments GB2	<ul style="list-style-type: none"> • Favour Worts Causeway sites because they wouldn't fundamentally change the nature of that part of the Cambridge boundary, visually or functionally (1) • Development here seems practical and has minimal impact (1) • English Heritage- The curved alignment of Beaumont Road will ensure that to some extent this allocation will give the appearance of 'rounding off' the city edge, though the eastern boundary might then have taken a more northeast-southwest alignment up to the track that forms the western boundary of the large field, whereas the current north-south alignment appears better suited to justifying the allocation of site GB2. We note the site includes locally listed farm buildings and while these might be retained, their setting is likely to be compromised by the allocation. It will therefore be necessary to consider whether or not there is sufficient wider public benefit to be derived from this allocation to justify the harm. The eastern boundary would need careful treatment to form an appropriate junction between the city and the Green Belt. • English Heritage-Not logical to develop on its own but justified if developed in conjunction with GB1. Recommend GB1 is developed first. The eastern boundary would need careful treatment to form an appropriate junction between the City and the Green Belt.

Site Number: GB3		
Total representations: 115		
Object⁸: 74	Support: 24	Comment: 17

	KEY ISSUES ARISING FROM CONSULTATION
Objections GB3	<ul style="list-style-type: none"> • Loss of views of fields and piece and quiet • Negative visual impact on views of Lime Kiln Hill • It is an encroachment on the Green Belt • Proposal doesn't check unrestricted sprawl nor does it assist in safeguarding countryside from encroachment • Contributes to coalescence Cambridge and Fulbourn • Object as development should be located in new settlements and better served villages • Object to development in Green Belt but if absolutely required this site is near employment and has good

⁸ Object support and comment as allocated in the JDI schedule

	<p>access to City</p> <ul style="list-style-type: none"> • NPPF Para 83 provides for Green Belt boundary changes only in “exceptional circumstances” The Council has not presented a compelling case as to why this constitutes exceptional circumstances (1) • Will encourage ribbon development along Fulbourn Rd (1) • Adverse impact on Green Belt due to its location on rising ground (37) • Adverse impact on Green Belt due to its location on rising ground. Proximity to and pressure upon Chalk Pits Nature reserve compromising its value as a nature reserve by increasing its isolation from wider countryside. The access to the development goes through existing housing areas and contributes to increased vehicular and pedestrian movements at the busy Robin Hood junction. • will have unacceptable adverse impact on the local ecological network including SSSI's, County and City Wildlife sites and will compromise the ability to achieve the Gog Magogs Strategic Green Infrastructure Scheme. The Council's Assessment has underplayed impacts on natural environment and biodiversity in particular. Reassessing Site GB3 could result in the score changing from amber to red in which case they should not be developed • Site lies close to nationally and locally designated sites Cherry Hinton Chalk Pit SSSI, Limekiln Hill Local Nature Reserve. Natural England would only be satisfied with these sites being allocated if they result in no adverse effect on these sites through uncontrolled access, fly tipping, fires etc. • Concerns over transport implications of the proposal – area already heavily congested. • At bursting point on services and infrastructure (3) • Lack of school places (1) • Impact on health facilities (1) • Adds to flood risk on lower ground (2) • Loss of arable land (6)
<p>Support GB3 (number of similar comments in brackets)</p>	<ul style="list-style-type: none"> • This would do not change the beauty of the area (1) • Good choice as close to Cherry Hinton with its facilities and transport links although Chalk Pits and Nature Reserve must be protected (1) • Support provided shared use cycle path can be converted to proper cycle lanes on both sides of Fulbourn Road (1) • Support employment or housing but address traffic issues prior to development (1) • Beneficial development but Cambridge still needs infrastructure to overcome congestion (1) • Support provided setting not compromised (2) • General support of option (5) • Support as only extending built up area slightly (1) • Support as large developments should be kept close to

	<p>Cambridge (2)</p> <ul style="list-style-type: none"> • Support this site as is accessible by public transport and bicycle. And is close to employment and services. This is preferable to village locations which add to commuting and congestion (2) • Support as there are good local employment, schools and shopping facilities (2) • Creates minimum strain on roads (1) • Minimal problems/ limited green belt development in established settlement may be appropriate (2) • Support as small developments and benefit housing (1) • Some of this land may provide opportunity for ARM to meet its growth requirements in the City, which could involve it doubling of its floorspace from 150,000sqft to 300,000sq ft over the next 10 years through a series of phased developments. Given its expansion requirement and its desire to remain in Cambridge it is therefore supportive of the allocation • Support development of this site as GB3 and GB4 are infill sites screened from the road by tall buildings on Peterhouse Technology Park and the rising ground to the south. Development should be recessed into the hillside to reduce visual impact further. Site GB3 should not be promoted for industrial development due to its proximity to residential development.
Comment	<p>Green Belt</p> <ul style="list-style-type: none"> • This site seems to cause low impact (2) • Best option is Fulbourn road site and NIAB site (1) • Fulbourn Rd with local employment preferable (1) • Most sites look suitable for housing (1) • Support Fulbourn Road (1) • Support for employment use as discrete and aligns with Peterhouse Technology Park. Proposers should offset balancing green belt provision elsewhere. • Would not materially effect the village of Fulbourn • Do not object to employment on this site as aligns with Peterhouse Technology Park and would be discrete. • English Heritage - These sites are relatively modest allocations where the boundary of the southern edge of the city would be aligned with the Peterhouse Technology Park. English Heritage does not object and would wish to see careful treatment of the southern boundary to form an appropriate boundary with the green belt.

Site Number: GB4		
Total representations:		
Object: 28	Support: 25	Comment: 49
KEY ISSUES ARISING FROM CONSULTATION		
Objections	Green Belt	

- “Special circumstances” case for a green belt release has not been made (1)
- Will lead to creep up the hill and is unwelcome (1)
- Proposal doesn’t check unrestricted sprawl nor does it assist in safeguarding countryside from encroachment (1)
- Contributes to coalescence Cambridge and Fulbourn (2)
- Object as development should be located in new settlements and better served villages (1)
- Green belt must remain for physical, emotional, mental and spiritual health as well as environmental reasons (2)
- Visual impact misrepresented in document (2)
- It will cause fundamental harm/impact upon the green belt (5)
- Loss of Green belt /creates precedent (6)
- If green belt is used it can never be replaced (2)
- Object to development in Green Belt but if absolutely required this site is near employment and has good access to city/minimal impact (2)
- Development will be an eyesore and should be recessed into the hill side to reduce visual impact further (1)
- Will be visible from higher ground to the south (1)
- Object to all green belt sites they should be left for future generations to enjoy (1)

Natural Environment Biodiversity

- Will ruin natural beauty of area (1)
- Loss of wildlife habitats and biodiversity (1)
- Puts pressure on Chalk Pits. Wildlife needs corridors to move between habitats should include a buffer zone between reserves and this site (3)
- Adverse impact on Chalk Pits Nature Reserve SSSI (2)

Active and Passive Local Recreation/Leisure

- Have long campaigned for a safe off road footpath link from Fulbourn Road south to the Roman Road. Lime Kiln Hill is dangerous for walkers and lacks a footpath for most of its length. Improved rights of way could be provided as part of this development to provide safe access to the wider countryside.

Traffic Issues

- Transport infrastructure in the area cannot cope with additional development.

Infrastructure

- At bursting point on services and infrastructure (2)
- Infrastructure (1)
- Lack of school places (1)
- Impact on health facilities (1)
- Adds to flood risk on lower ground (2)

	<p>Loss Agricultural Land</p> <ul style="list-style-type: none"> • Loss of arable land (5)
<p>Support (number of similar comments in brackets)</p>	<ul style="list-style-type: none"> • Good choice as close to Cherry Hinton with its facilities and transport links although Chalk Pits and Nature Reserve must be protected (1) • Support provided shared use cycle path can be converted to proper cycle lanes on both sides of Fulbourn Road (1) • Beneficial development but Cambridge still needs infrastructure to overcome congestion (1) • Support provided setting not compromised (2) • General support of option (9) • Limited green belt development in established settlement may be appropriate (1) • Represents a natural extension of the Technology Park (1) • Support as only extending built up area slightly (1) • Support as large developments should be kept close to Cambridge (2) • Support this site as is accessible by public transport and bicycle. And is close to employment and services. This is preferable to village locations which add to commuting and congestion (1) • Support as there are good local employment, schools and shopping facilities (2) • Creates minimum strain on roads (1) • Minimal problems/ limited green belt development in established settlement may be appropriate (1) • Some of this land may provide opportunity for ARM to meet its growth requirements in the City, which could involve it doubling of its floorspace from 150,000sqft to 300,000sq ft over the next 10 years through a series of phased developments. Given its expansion requirement and its desire to remain in Cambridge it is therefore supportive of the allocation • Support development of this site as GB3 and GB4 are infill sites screened from the road by tall buildings on Peterhouse Technology Park and the rising ground to the south. Development should be recessed into the hillside to reduce visual impact further. • Support development of this site from an economic perspective as it forms a logical extension to the existing Peterhouse Technology Park and provide quality employment development for high tech uses • Supports the development as it represents a discrete extension to the mini science and technology park and will provide employment for local people, provide synergy with existing businesses, and contribute to business generally in the Cherry Hinton local centre
<p>Comments</p>	<p>Alternative Locations</p>

	<ul style="list-style-type: none"> • Most jobs opportunities in north of the City. Focus instead on Histon Girton Milton Waterbeach Cottenham (1) • A limited expansion may be acceptable if careful attention is given to height massing & materials (inc colour) the site can be seen from higher ground to the south. Any development must safeguard the amenity of adjoining housing to the north , be no more than 2 storeys and incorporate a green roof to minimise visual impact from the higher ground and respond to environmental considerations (32). • Any development must safeguard the amenity of adjoining housing to the north , be no more than 2 storeys and incorporate a green roof to minimise visual impact from the higher ground and respond to environmental considerations (1)
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CHAPTER 9: SITE OPTIONS	
QUESTION NO.	SUMMARY OF REPS
QUESTION / Paragraph	
<p>Site Option GB5 : Fulbourn Road East</p> <p>District: SCDC Area: 6.92ha Use: Employment development</p> <p>Support: 19 Object: 77 Comment: 14</p>	<p>ARGUMENTS IN SUPPORT: (number of similar comments in brackets)</p> <ul style="list-style-type: none"> • Support if well designed as a small development adjacent to the urban area. (14) • Cambridgeshire County Council - Support the proposed employment use for this site from an economic development perspective. It forms a logical extension to the existing Peterhouse Technology Park and presents the opportunity to provide additional quality employment development for high tech related uses. (1) • Support because accessible by public transport and bicycle, close to services so preferable to development in villages which would contribute to more commuting, traffic congestion, pollution, environmental impact. (1) <p>OBJECTIONS:</p> <ul style="list-style-type: none"> • Development of Site GB5 would be an unsympathetic "ribbon" development of commercial premises on rising ground, which would be contrary to the fundamental Green Belt purposes and functions bringing a "finger" of urban sprawl out into the Green Belt countryside. The development effectively further reduces the separation between Cambridge and Fulbourn. The development would be highly visible from the high ground to the south - the roofs of the existing Technology Park are already prominent when viewed from Shelford Road. (46) • The Parish Plan is opposed to changes to the Green Belt around the village to retain the environment and ambiance of Fulbourn. (1) • This is green belt land. Building here will impact on wildlife and farmland, and people's pleasure in the countryside. It will add to existing heavy traffic on

Fulbourn Road. This would put increased pressure on schools, and Addenbrooke's and the Rosie. (3)

- It would increase traffic at peak times (cars already queue along Fulbourn Road, concerned about safety and environmental impact). It may be 'easily accessible' by bike but not safely plus currently Fulbourn Road serviced by one bus route only. (6)
- There is no need for this development, which would adversely affect the Green Belt setting of Cambridge as there is an acknowledged surplus of allocated employment land in South Cambridgeshire. (2)
- Development of the full site would harm the character and appearance of the nearby Conservation Area. Strongly recommend that the site does not extend to the east of Yarrow Road and that the southern boundary gets further consideration to ensure development is not built on the crest of the hill that rises to the south of the Fulbourn Road. (1)
- Site could be developed but only up to the roundabout. (1)
- Sites GB3, GB4 and GB5 lie close to nationally and locally designated sites including; Cherry Hinton Chalk Pit SSSI, Limekiln Hill, LNR and Netherhall Farm Meadow CWS. NE would only be satisfied with these sites being allocated if it can be demonstrated that development will not have an adverse effect. (1)
- Any development close to Cambridge will put pressure on the City Centre and local infrastructure. (1)
- it is possible that a case can be made that these sites meeting the requirement for 'very special circumstances' but the argument to support the release of Green Belt has not yet been made. Until a strong case is made, such as the extension of ARM, then both sites should be opposed on principle as they are in the Green Belt. (1)
- Object to loss of Green Belt land. (9)
- Loss of agricultural land. (1)
- Loss of view south when driving down Yarrow Road (1), visible from Fulbourn Road (1).
- Site is too big, if it were half the size it could be supported. (1)
- Object as there is no assessment of traffic impacts. (1)
- Move employment growth to other parts of the UK that need it more. (2)

COMMENTS:

- This option seems practical with minimal impact. (2)
- Woodland screening will be required, consideration should be given to the provision of public open space, which the area is deficient in. Regarding transport, the current narrow shared use pavement on the Fulbourn Road needs to be converted such that both sides of Fulbourn Road have proper on-road, cycle lanes, which

	<p>continue around Gazelle Way. Cycle provision also needs looking at on routes into the City and into Cherry Hinton village centre to encourage residents or employees to not use cars. This bit of the Fulbourn Road is not on a bus route. (1)</p> <ul style="list-style-type: none"> • Low fluvial risk. Groundwater beneath site is valuable resource needing protecting and improving. Site investigations and risk assessments needed. Infiltration drainage potential. (1) • Do not object to this site. Although development is Green Belt land it aligns with the adjacent Peterhouse Technology Park site. Part of the proposed site might be considered suitable for employment development consistent with the adjacent existing employment areas provided that the boundaries of the site are widely buffered and wooded or otherwise screened to merge with the adjacent rural landscape. (2) • Low impact development. (1)
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<p>Site Option GB6: Land to south of the A14 and west of Cambridge Road (NIAB 3)</p> <p>Support:24 Object: 177 Comment: 24</p>	<p>ARGUMENTS IN SUPPORT: (number of similar comments in brackets)</p> <ul style="list-style-type: none"> • Whichever site is chosen will not make traffic situation any better, but support NIAB3 as less housing built on that side of town than Fulbourn / Worts Causeway sites. • Ideal site with access from Histon and Huntingdon Roads - should include a link road to both. • Support all sites so long as well considered and do not detract from setting of Cambridge. What do they offer in compensation for loss of Green Belt? • Option seems practical with minimal impact. (2) • Support as only extending existing built up areas. (3) / Limited Green Belt development. (1) • Large developments should be kept nearer to Cambridge (within A14/M11 corridor). (2) • <u>Accessible</u> by public transport and cycle, close to employment and services – preferable to new houses in villages which contribute to commuting, congestion, pollution, environmental impact. (1) Access to Park & Ride, guided bus and Addenbrookes Hospital and Science Parks as employers. (1) Proximity to centres of employment, good public transport schools and facilities. Thereby putting minimum strain on road congestion. (1) • Most of the sites look suitable for housing. • Most suitable site – current development in area, proximity to A14, could also be considered for Community Stadium. • Would lessen traffic travelling into Cambridge. • Road network better with access to A14. • Since most jobs in north of city, further development in the north seems logical. • Best place for community stadium – road access and transport easily improved – good use of site. Moe pylons
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if an issue. Restrict housing to high density and away from A14.

OBJECTIONS:

- No further housing, nor a proposed Community Stadium, should be built on land adjacent to existing NIAB development sites 1 and 2. **(143)**
- Protect Green Belt - Object to all sites that encroach onto Green Belt land. **(4)** No Green Belt unless exceptional circumstances **(2)** Green Belt can never be replaced. **(3)** Better alternatives. **(1)**
- Air Quality – How does encouraging families to live in areas of poor air quality tally sustainability and environmental agendas? **(1)** Green Belt needed to protect air quality. **(1)** Development within AQMA caused by high exhaust emissions is unacceptable - remain green space to assist with carbon absorption to aid improved air quality. **(1)** No sense to develop site if issue for living and working there. **(2)**
- Not suitable for residential – too close to A14 – not fair or healthy for future residents. **(2)** / commercial would encourage long distance commuting. **(1)**
- Coalescence - Loss of separation with Histon & Impington – turn into suburb of Cambridge. **(3)** Create coalescence – loss of remaining small, but important gap and increase urbanisation along Histon Road due to Orchard Park. **(1)** Impact on Girton and surrounding villages to become part of Cambridge. **(1)**
- Infrastructure needed may be unaffordable and/or delayed.
- No to NIAB 3 - area cannot cope with more. **(4)** Overcrowding of residential area **(1)**
- Health issues with pylons. **(2)**
- This side of city will experience greatest impact of development already envisaged. Further development will be straw that breaks camels back. 'Community stadium' would threaten amenities of residence close by.
- On NIAB 3 infrastructure, the effect on Girton would be too deleterious for the Parish Council to approve it.
- object to residential – could be considered for improvement for open space purposes.
- 1. Green Belt - threat of coalescence. 2. Much of site in Air Quality Management area, and unsuitable. 3. Likely to require noise barriers from A14 - unacceptable visual impact. 4. No demand for employment development - unlikely to be mixed use development.
- Only remaining open land separating City and Impington – don't want to lose identity, be seen as extension to Cambridge. Community Stadium will generate traffic from north through Histon and Impington adding to existing traffic issues.
- Impact on Roads - Commercial development off

Madingley Road greatly added to congestion and increased journey times because of new traffic. **(1)** Strain on roads into Cambridge and Histon's High Street, already congested. **(1)** Increase traffic into Cambridge – already nearing breaking point. **(1)** Exacerbate traffic problems. **(3)**

- Drainage - How can be confident that SUDS will work for NIAB 1, 2 and 3? Orchard Park required £7 million surface water attenuation scheme - underground strata is identical. Unless addressed, ground water will saturate award drain and Beck Brook catchments with serious threats to properties and businesses in Histon, Westwick, Rampton and Cottenham. Surface water flow in northwest direction towards Westwick. Ditches already overflow, during heavy rains.
- impact on species identified in SA - retain and enhance biodiversity. NPPF – allocate sites with least environmental or amenity value & consider benefits of best agricultural land.
- not suitable for housing due to poor air quality and noise problems.
- Support for industrial but not residential due to AQMA.
- Loss of agricultural land and Green Belt. **(2)**
- Impact on Green Belt purposes – coalescence. 2. Air quality issues. 3. Visual impact. 4. Public transport overcrowded and unreliable. 5. Histon Road unsafe for cycling & congested (even before NIAB 1&2). 6. Overdevelopment. 7. New community facilities required.

COMMENTS:

- Near motorway and Park & Ride.
- A14 capacity - needs upgrading. **(1)** Worry about adding to the overload on A14, especially if Cottenham developed. **(1)**
- Object in principle, but if absolutely necessary, NIAB3 least worse (3). Area nearest A14 should be restricted to non-domestic development / leave southern part for amenity space for residents of NIAB developments - allows access close to A14 and not add to traffic congestion on Histon Road.
- not supportive of employment development given its relative isolation from other employment areas. Support some residential development linked to 'NIAB' 1&2.
- Do not replicate mistakes of Orchard Park. **(2)** Looks scrappy, unfinished, poor streetscapes, bad cycle permeability, being completely cut off from Cambridge by hostile King's Hedges Road. **(1)**
- NIAB 3 site close to Hauxton is seeing huge development already with Great Kneighton and site next to Waitrose. More development will cause serious traffic problems - queuing at dangerous levels on M11 during morning rush hour.

	<ul style="list-style-type: none"> • While A14 will ensure no real harm to setting of Cambridge, important northern boundary of site kept sufficiently distant from A14 to allow landscape corridor and avoid repeat of poor relationship between Orchard Park and A14. • groundwater beneath site important base-flow to local watercourses and for local abstractions - need to be maintained and protected. Potential for contamination needs investigating. Potential to use infiltration drainage. Pollution prevention measures are likely for any employment use. • Area near junction 31 of A14 may be suitable but concern that Histon Road and Huntingdon Road are becoming far too busy. • Housing on NIAB site is appalling and too crowded – presumably NIAB3 would be similar.
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ISSUE: Sub-Regional Sporting, Cultural and Community Facilities

CAMBRIDGE CITY COUNCIL CAMBRIDGE LOCAL PLAN – TOWARDS 2031 ISSUES AND OPTIONS REPORT (2012)

Chapter 11 – Promoting successful communities

<p>Option 179: A new Sub-regional stadium</p> <p>Support =</p>	<ul style="list-style-type: none"> • 119 out of 139 respondents to this question supported a new sub-regional stadium. Of the 119 supporters, 30% were Cambridge residents, with the remainder living outside the city. Many of the supporters appeared to be supporters of Cambridge United FC. The 20 objectors came from the following areas: 5 each from Trumpington & Grantchester; 7 from Cambridge & the remainder from Coton, Hauxton & Haslingfield. • Those supporting the proposed new sub-regional stadium also suggested a number of other sites for the delivery of the stadium , for example Cambridge East and NIAB. • Community Stadium would benefit the area; • Clear need for a Community Stadium ‘live entertainment’ facility with indoor training pitch and ancillary commercial space; • Shortfall in provision and support for a climbing wall; • Develop canoe trails and provision for canoeists; • Support for full size boating lake; • Many people supporting <ul style="list-style-type: none"> ○ Support the proposed 8-10,000 capacity stadium; ○ Support the venue to be suitable for other sports as well e.g. rugby and hockey. • Many people responding indicated that Abbey Stadium should not be retained citing reasons such as the lack of training facilities and poor transportation links. Site could provide much need housing. • Responses indicated that the development of Abbey Stadium
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for housing was conditional on:

- Not causing further transport issues;
- The area being enhanced;
- Replacement sports facilities are provided and improved upon and with suitable affordable housing;
- Replacement sports facilities are first provided;
- Other responses to indicated that the development of Abbey Stadium should not include a supermarket or offices;
- No need for Cambridge to provide regional facilities;
- Location of stadium at Trumpington Meadows is unsuitable mainly due to transport issues;
- Stadium would alter the village character of Trumpington;
- Location of stadium South of Cambridge unsuitable;
- Abbey Stadium was supposed to provide a Community Stadium in 1999;
- Community Stadium is unviable;
- Loss of Green Belt;
- Many people objecting suggested an alternate location including:
 - North of Marshalls;
 - Abbey Stadium;
 - Newnham;
 - Southern Fringe
- Support the venue to be suitable for other sports as well e.g. rugby and hockey;
- Abbey Stadium should be retained as a Community Stadium or as a community facility rather than high-density housing. CUFC should not move from the Abbey Stadium. Relocation may not overcome issues of congestion and parking in a residential area;
- Developing Abbey Stadium for housing was not acceptable but retained/improved or it should be for another type of sports facility;
- The proposal:
 - Conflicts with the definition given the commercial background of the project;
 - Lack sufficient parking;
 - Fail to take account of local communities and Trumpington's village setting;
 - Should be more inclusive e.g. facilities should permit amateur and recreational sport activities with less focus on football and open to other sections of the community;
 - Raises concern about the additional retail and housing;
 - Need to increase access for Cambridgeshire schools;
- Grosvenor's proposals are unacceptable:
 - Increased traffic and parking congestion in the surrounding area and additional burden on Park and Ride;
 - Increased burden on schools (new school at Trumpington Meadows cannot meet the additional need);
 - Significant additional erosion of the Green Belt;
 - Encroachment on the nature reserve at Byron's Pool;
 - Significant impact on the sustainability of neighbouring sports

	<p>and social venues;</p> <ul style="list-style-type: none"> ○ Significant additional strain on Parish of Haslingfield; ○ Reduction in quality of life of local residents caused by noise, light, traffic and litter from the venue. <ul style="list-style-type: none"> ● Alternative locations included Northstowe and Waterbeach, NIAB, Cambridge East, Cambridge Airport, University Site at Madingley Road, Newnham, Cowley Road
<p>Option 180: Ice Rink</p> <p>Support = 42 Object = 4</p>	<ul style="list-style-type: none"> ● An ice rink would support sustainable communities; ● Need for an Ice Rink is economically viable and will improve Cambridge's sports facilities; ● Financial support available; ● No reasonable alternative to an ice rink; ● Proposal should form part of a general sports complex with good transport links, education and research facilities; ● Funding available, only a site is needed; ● Possible Locations: Not in the city, not Abbey Stadium, not North West Cambridge, cycling distance of the City Centre, West Cambridge, Science Park, near railway station, Abbey Stadium site, suburb / outskirts location with good transport links. ● Doubts over viability and therefore needs to be proven. : Ice rinks elsewhere have closed. Needs to be financially neutral; for Cambridge City Council and Council Tax payers; ● Ice rinks are environmentally unfriendly; ● Loss of Green Belt, congestion in and around Trumpington Park and Ride and Addenbrooke's.
<p>Option 181: Concert Hall</p> <p>Support = 4 Object = 2</p>	<ul style="list-style-type: none"> ● Lack of large scale concert venue in Cambridge; ● Concert hall would be supported locally; ● Proposals should include a conference hall and multi-purpose venue; ● Should be large enough to cater for big London and international orchestras, touring opera and ballet companies, as well as high end artists and acts; ● Multi-purpose venue would be more viable; ● Other existing venues could be better used; ● Concert hall should be provided in collaboration with the University; ● Replace Corn Exchange with concert hall; ● Must be easily accessible/close to good transport links; ● The Council must collaborate with neighbouring authorities to develop best solution for future and existing population. Community stadium, ice rink and concert hall proposals should not be considered in isolation; ● Possible locations: Clay Farm, Station area, close to schools. Mill Road – the old Picture House, outside city boundaries; suburbs/outskirts location with good transport links; ● Concert hall alone requires need/justification; ● Multi-purpose venue to include conferencing and leisure more viable and will support Cambridge's tourism and conferencing reputation; ● Difficult to justify – other venues are available and there is

	<p>insufficient demand to justify a purpose-built venue;</p> <ul style="list-style-type: none"> • No need – Cambridge is already well served with suitable conference venues; • Loss of Green Belt, congestion in and around Trumpington Park and Ride and Addenbrooke's.
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CAMBRIDGE LOCAL PLAN – TOWARDS 2031 AND SOUTH CAMBRIDGESHIRE LOCAL PLAN. ISSUES AND OPTIONS 2 CONSULTATION. PART 1 – JOINT CONSULTATION ON DEVELOPMENT STRATEGY AND SITE OPTIONS ON THE EDGE OF CAMBRIDGE

Chapter 10 Sub- Regional Sporting, Cultural and Community Facilities

Question 4:

Do you think there is a need for a community stadium serving the sub-region?

(S: 384, O: 70, C: 130)

Main Views Received:

- Widespread support for concept with a range of community sport facilities: Yes (65% of responses); No (19% of responses).
- 7% of responses specifically state not in Green Belt.
- Should be investment spread across a number of local sports facilities / community centres rather than one multi-purpose stadium.
- Would help to promote active lifestyles and a sense of community.
- There is a shortage of all-weather pitches for the community and Cambridge needs a bigger indoor sports hall.
- Desirable, but cannot be considered as a need.
- Concerns about traffic impact if located at Trumpington Meadows.
- Undecided / not enough evidence there is or will be sufficient demand to make a facility viable.
- Public money or S106 funds should not be used for Cambridge United.

Question 5:

Do you agree with the principles identified for the vision for a community stadium?

(S: 331, O: 33, C: 25)

Main Views Received:

- Widespread support for the principles: Yes (78% of responses); No outright (5% of responses); Partial agreement or other comment (17%).
- No necessity for a stadium to be combined with sports facilities for local residents.
- Full support for the principle that the stadium must be available for community use.
- The term 'community stadium' misrepresents what is being proposed as it would be a sub-regional venue rather than a facility for the community.
- The principles could make specific reference to other sporting needs, such as a lead-climbing wall.
- Any site should be capable of expansion of both buildings and practice / playing areas in the longer term.
- Additional principles suggested:
- Must have good strategic road access;
- Must have sustainable transport links;

- Must not have any substantial adverse effect on local community where it is based;
- Must avoid adverse environmental impact;
- Must maximise its return on investment for long term viability;
- Must not be in the Green Belt;
- Must be sited away from housing.

Question 6:

If a suitable site cannot be found elsewhere, do you think the need is sufficient to provide exceptional circumstances for a review of the Green Belt to accommodate a community stadium? (S: 303, O: 62, C: 23)

Main Views Received:

- Need for Stadium and associated sports facilities outweigh Green Belt;
- Sites outside the Green Belt have considerable disadvantages compared to the Green Belt options;
- No exceptional circumstances, No specific need has been identified;
- Other options existing outside the Green Belt;

Question 7:

Which if any of the following site options for a community stadium do you support or object to, and why? (S: 238, O: 27, C: 54)

See site summaries below (support or object to individual sites in main question added to totals below).

Community Stadium Site Options

SITE OPTION CS1:

The Abbey Stadium and Adjoining Allotment Land, Newmarket Road, Cambridge

Site Size: 7.1 hectares **District:** Cambridge

Support: 38 **Object:** 52 **Comment:** 18

Key issues in representations:

Support:

- Existing site, outside green belt, central

Object:

- Traffic impact, loss of allotments, not big enough

SITE OPTION CS2:

Cowley Road Cambridge (former Park and Ride and Golf Driving Range)

Site Size: 6.5 hectares **District:** Cambridge

Support: 32 **Object:** 32 **Comment:** 17

Key issues in representations:

Support:

- Near new Station

Object:

- Too Small, City Council – Employment Development only

SITE OPTION CS3:

North of Newmarket Road, Cambridge East

Site Size: 40 hectares **District:** South Cambridgeshire

Support: 26 **Object:** 23 **Comment:** 15

Key issues in representations:**Support:**

Close to existing site

Object:

Marshalls - not available

SITE OPTION CS4:

Land south of the A14 and west of Cambridge Road (NIAB3)

Site Size: 9 hectares **District:** South Cambridgeshire

Support: 9 **Object:** 192 **Comment:** 14

Key issues in representations:**Support:**

- Close to A14

Object:

- Green Belt impact, too small,
- Traffic congestion
- Land owner – not available

SITE OPTION CS5:

Land south of Trumpington Meadows, Hauxton Road, Cambridge

Site Size: 32 hectares **District:** Cambridge / South Cambridgeshire

Support: 306 **Object:** 92 **Comment:** 32

Key issues in representations:**Support:**

- Good transport and road access, would bring sporting and community benefits, Available

Object:

- Traffic Congestion and Parking, Green Belt impact

SITE OPTION CS6:

Land between Milton and Impington, north of A14 (Union Place)

Site Size: 24 hectares **District:** South Cambridgeshire

Support: 12 **Object:** 46 **Comment:** 10

Key issues in representations:**Support:**

- Close to CRC

Object:

- Poor access, Isolated, Green Belt harm

SITE OPTION CS7:

Northstowe

Site Size: 432 hectares (with additional 60 hectares strategic reserve) **District:** South Cambridgeshire
Support: 11 **Object:** 37 **Comment:** 16

Key issues in representations:

Support:

- Outside Green Belt, Near Guided Bus

Object:

- Too far from City, Impact on other uses
- HCA - Not in Masterplan

SITE OPTION CS8:

Waterbeach Town New Option

Site Size: 558 or 280 hectares **District:** South Cambridgeshire

Support: 14 **Object:** 34 **Comment:** 13

Key issues in representations:

Support:

- Outside Green Belt, Near Railway, Support from landowners if need is established

Object:

- Too far from City, Long lead in time

SITE OPTION CS9:

Bourn Airfield New Village

Site Size: 141 hectares **District:** South Cambridgeshire

Support: 7 **Object:** 43 **Comment:** 10

Key issues in representations:

Support:

- Outside Green Belt

Object:

- Too far from City
- Lack of public transport
- Land owner – not available

ICE RINK AND CONCERT HALL

Question 8a:

Rather than identifying specific sites, should the Local Plans include a general policy to assist the consideration of any proposals for sub regional facilities such as ice rinks and concert halls, should they come forward?

(**S:** 32, **O:** 12, **C:** 14)

Main Views Received:

- There was majority support for including a general policy rather than allocating sites (30 respondents);
- However, several respondents suggested sites, and stated that proposals for sub-regional facilities would not progress without specific sites being identified;

- Several respondents stressed the need for any facilities to be accessible via sustainable transport modes;
- Several respondents stated that the need and business case for such facilities should be evidenced, and that the proposal must be commercially viable.

Question 8b:

Are the right principles identified? If not, what should be included?

(S: 28, O: 4, C: 15)

Main Views Received:

- There was majority support for the proposed policy principles (18 respondents);
- However, support from 5 respondents was conditional on no development in the Green Belt;
- Six respondents thought that accessibility by public transport such be maximised whilst stating that car parking will also be required;
- Five respondents questioned the viability of such development.

CAMBRIDGE EAST

SOUTH CAMBRIDGESHIRE DISTRICT COUNCIL. ISSUES AND OPTIONS 2 (2012)

Cambridge Airport (Issue 108)

Question 108:

What approach should the Local Plan take to Cambridge Airport?

- Retain the current allocation for development at Cambridge East. (S: 9 (2 PC), O: 2, C: 0)
 - Safeguard the site for development after 2031 or through a review of the Local Plan. (S: 18 (7 PC), O: 2, C: 0)
 - Return the whole site to the Green Belt or just the parts of the site which are open. (S: 14 (2 PC), O: 2, C: 2)
- Please provide any comments. (S: 1 (PC), O: 0, C: 7)

Main Views Received:

- **Marshalls of Cambridge** – most sustainable location and no exceptional circumstances to justify changes to Green Belt. Safeguard the site.
- **Cambridgeshire County Council** - retain a policy and safeguard land for post plan development. An HRC is still required in Cambridge East area.
- **Cambridge City Council** – both councils working together and consulting on options – results will inform preferred options in draft plans.
- Whilst Marshalls have no current intention to move, it may change in period 2011-31. Most sustainable location - should be retained.
- Marshalls indicated no longer looking to relocate - confirms it will not be delivered in foreseeable future. Unavailable - 'unsound' to retain. Return to Green Belt.
- Will not come forward in plan period. If it comes forward it can be reintroduced after thorough vetting.
- Provides green barrier and open space to this sector of Cambridge. If Marshalls left, a better use would be nature reserve or country park.
- Majority of (unbuilt) area should be returned to Green Belt, but built-up areas important for employment safeguarded as such.

- What was in Green Belt should be returned to ensure clear separation between city and villages. Return proposed green corridor west of Teversham to Green Belt and where possible increase biodiversity.
- Little point returning to Green Belt now it has been removed – may yet be windfall.

Land North of Newmarket Road, Cambridge East

Question 109:

What approach should the Council take to the potential for housing development on land north of Newmarket Road at Cambridge East?

- i. Conclude that development cannot be relied upon and the site be treated in the same way as Cambridge Airport? (S: 7, O: 0, C: 2)
 - ii. Rely upon the policies of the Cambridge East Area Action Plan to determine any planning applications for development? (S: 0, O: 0, C: 2)
 - iii. Include a new policy for the site in the Local Plan allocating the land for a housing-led development? (S: 6 (1PC), O: 0, C: 7)
- Please provide any comments. (S: 1, O: 0, C: 5)

Main Views Received:

- **Marshalls of Cambridge** – no changes have occurred since adoption of CEAAP to warrant reconsideration. Guidance and requirements of CEAAP are recent and remain relevant and accord with NPPF.
- **Cambridge City Council** – whilst land within SCDC, given the functional relationship with the city, the Council wishes to work together on long-term future of this site.
- **Cambridge Past, Present and Future** – obvious site for development provided public transport along Newmarket Road can be improved. Green corridor opposite Teversham should be retained as Green Belt.
- Almost certain to come forward before 2031 - need to take proactive approach.
- Probably not appropriate to rely on CEAAP as assumes whole area would be developed, therefore some facilities designed to support this site could be accommodated on airfield site.

CAMBRIDGE CITY COUNCIL CAMBRIDGE LOCAL PLAN – TOWARDS 2031 ISSUES AND OPTIONS REPORT (2012)

SECTION OF THE ISSUES AND OPTIONS REPORT (2012)	KEY ISSUES ARISING FROM CONSULTATION
Cambridge East – general comments	<ul style="list-style-type: none"> • The airport pollutes the city and is too near to built-up areas; • Designate the site in the plan as an airport; • Any future development should factor in the need for high quality provision for cycling in order to reduce impacts on the local transport infrastructure; • Retain the existing approach of 4 major growth areas, ensuring public transport connectivity; • Consider the need for provision for household recycling centre and a commercial waste management facility in the Cambridge East area.

<p>Option 34: Cambridge East – Retain current allocation</p> <p>Support = 5 Objections = 5</p>	<p>Arguments in support of this option:</p> <ul style="list-style-type: none"> • Housing is needed; • If this area is built out, consideration must be given to how people travel in to Cambridge as Newmarket Road is highly congested; • Marshall should be encouraged to relocate. <p>OBJECTIONS TO THE OPTION:</p> <ul style="list-style-type: none"> • Marshall confirms its intention to remain at Cambridge Airport for the foreseeable future; • We should not continue an approach predicated on Marshall moving away from Cambridge Airport, including the land North of Newmarket Road; • This option will have negative impacts on biodiversity according to the Sustainability Appraisal.
<p>Option 35: Cambridge East – Safeguarded Land</p> <p>Support = 7 Object = 5</p>	<p>Arguments in support of this option:</p> <ul style="list-style-type: none"> • Cambridge and its sub-region have a history of buoyant growth over many years. Growth will continue. Designating Cambridge East as safeguarded land reflects its inherent qualities as a sustainable location and will give flexibility in the longer term; • Support the retention of the allocation in the interests of safeguarding a direct cycleway between Cambridge East and Lode; • Marshall should be encouraged to relocate. <p>OBJECTIONS TO THE OPTION:</p> <ul style="list-style-type: none"> • Delays decision-making with associated waste and costs incurred from business uncertainty; • Transport infrastructure is inadequate to deliver a sustainable development in this location; • This option will have negative impacts on biodiversity according to the Sustainability Appraisal.
<p>Option 36 – Cambridge East – return land back to the Green Belt</p> <p>Support = 11 Object = 5</p>	<p>Arguments in support of this option:</p> <ul style="list-style-type: none"> • If Marshall decides to leave, the land should be returned to Green Belt. Currently, Marshall provides a green lung and barrier between the city and Cherry Hinton, as most of the land is grass around a runway, not intensively developed; • The land was only taken out of the Green Belt because it was to be used for housing. As it is not to be used for housing (for the foreseeable future) it should be returned to Green Belt; • The airport should remain where it is; • Option 36 is likely to deliver significant benefits in addressing key sustainability issues relating to transport, water, flood risk, landscape and biodiversity as compared to protecting this area for future development. <p>OBJECTIONS TO THE OPTION:</p> <ul style="list-style-type: none"> • Housing in sustainable locations is needed over Green Belt; • Successive studies have confirmed that land at Cambridge East does not fulfil any Green Belt function. The 2012 Green Belt Study by LDA Design confirms that. Green Belt

	<p>boundaries are to endure and should only be altered in response to exceptional circumstances. None exists (Marshall);</p> <ul style="list-style-type: none"> • Site is of little value ecologically in comparison to other Green Belt sites; • The Green Corridor opposite Teversham should be retained as Green Belt: the rest of the site should be Safeguarded Land outside Green Belt designation.
<p>Whilst in South Cambridgeshire District Council, what issues do you think there are for the city with development coming forward on land north of Newmarket Road?</p>	<ul style="list-style-type: none"> • Land north of Newmarket Road remains an obvious site for development, providing public transport along Newmarket Road corridor can be improved; • There should be a much more serious look at potential for enhanced flood risk caused by building on green areas. Permission for new development should only be granted if consistent with Strategic Objective 2 (reduction of flood risk); • A good opportunity for development - probably housing, but also a site for a football stadium; • This development would put yet more pressure on traffic on Newmarket Road; which is badly designed, badly congested and the least attractive approach to the city. The whole area from Barnwell Bridge to Elizabeth Way roundabout needs remodelling, including the retail park which could be reduced in size, with a service road to reduce pressure on the main road. Some scope for housing development if the retail area was reduced; • Development north of Newmarket Road should safeguard the open spaces between Cambridge and Fen Ditton to preserve an extensive area of open land in this part of the city and South Cambridgeshire given the increasingly intensive developments that are likely in the immediately adjacent urban areas; • Sustainable transport infrastructure is key to the development of this area;
<p>Are there any other reasonable alternatives that should be considered at this stage?</p>	<ul style="list-style-type: none"> • Retain Cambridge Airport and add new option to protect and develop the airport further.

CAMBRIDGE NORTHERN FRINGE EAST

SOUTH CAMBRIDGESHIRE DISTRICT COUNCIL. ISSUES AND OPTIONS 1 (2012)

Question 110: Key principles for the development of Cambridge Northern Fringe East?

- i. Do you agree the vision for the area of a high quality, high density, employment led redevelopment focussed on a new public transport interchange (guided bus and rail) at Chesterton Sidings? (S:21 (2 PC), O:1, C:6)
- ii. Have we identified the right principles for development? (S:7 (2 PC), O:2, C:8)
- iii. What sites should be included in the boundary of the area?
 - Need consistent approach by City Council and South Cambridgeshire.

- Sewage works (Cambridge City Council: explore down-sizing)
- Cowley Road & former P&R site
- Science Park Phase 1 (redevelopment)
- Chesterton Sidings
- Chesterton Fen, between Fen Road and railway line

Main views expressed:

- Overall support for making the most of the railway/guided bus interchange
- Last major redevelopment opportunity in/on edge of Cambridge
- Include a new road from Cowley Road area into Chesterton Fen (Milton PC & Fen Road residents association)
- Don't build houses – too accessible for London commute
- Include some housing as part of mix
- Include marina/boat yard
- Redevelopment should not prejudice operation of the sewage works (Anglia Water)
- Car parking should be underground

**CAMBRIDGE CITY COUNCIL CAMBRIDGE LOCAL PLAN - TOWARDS 2031
ISSUES AND OPTIONS REPORT (2012)**

Option 33 Northern Fringe East:

Number of Supports = 11

Number of Objections = 5

SECTION OF THE ISSUES AND OPTIONS REPORT (2012)	KEY ISSUES ARISING FROM CONSULTATION
General comments on the Northern Fringe East	<ul style="list-style-type: none"> • Mixed use aspect is critical, requiring local retail, commercial and domestic elements; • Support for the new Cambridge Science Park Station; • Need for an exciting wider vision for the area to complement the delivery of the new station; • Water treatment works should be downsized and recreated as a practical demonstration of a modern high tech sewage works; • Need to consider increased use of energy from waste; • Need to include provision of a new relief road linking Cowley Road and Fen Road; • Support for the Chisholm Trail cycle route and cycle and pedestrian bridge; • There is scope at Northern Fringe East for higher density but there must be full consultation with the local community to ensure that it does not detract from the character of the wider area; • Proposals for the Northern Fringe East will need to consider impacts on local biodiversity and identify suitable mitigation and enhancement options;

	<ul style="list-style-type: none"> • Water treatment works should be moved to free up valuable development land; • In order to meet the growth that is currently envisaged, Anglian Water has investment plans in place to expand and upgrade the wastewater treatment works at Cambridge. This work is currently at feasibility stage and could involve relocation of assets on the site. This does not necessarily mean that the footprint of the works will become smaller. In any event, Anglian Water cannot envisage any situation where housing development on or close to the Anglian Water site would be acceptable; • Need to understand the impact of the development on traffic problems in Fen Road; • CamToo will destroy Stourbridge Common and Ditton Meadows. Furthermore, the creation of a bridge link to Chesterton does not depend on a sporting facility; • Need to consider the impact of CamToo on biodiversity, landscape and visual amenity; • Land should not be safeguarded for a busway across Stourbridge Common and Ditton Meadows as it would impact on landscape quality and amenity; • Need to move the waste water treatment works; • Need for high quality cyclist and pedestrian facilities, including a high-quality cycle route to Waterbeach and completion of the Chisholm Trail; • Need to consider the wider impact on the level crossing on Fen Road and the need for alternative access arrangements; • Need for consideration of the mix of uses, particularly the desire and need for residential use and hotel development in the locality as a result of station development; • Route required to reduce pressure on Chesterton High Street; • Gentrification with improvements to landscape, sewerage, drainage and access.
Option 33: Northern Fringe East	<p>ARGUMENTS IN SUPPORT OF THIS OPTION:</p> <ul style="list-style-type: none"> • The three authorities need to work closely together to produce site-specific detailed analysis of the land use, transport, urban design and environmental planning options for the area's future use; • Need for unified development of the area; • Priority should be given to employment; • Need to provide a new relief road to link Cowley Road to Fen Road; • Need to improve access for and safety of cyclists and pedestrians; • Support the delivery of development at Northern Fringe East, which should not involve any further land being released from the Green Belt. <p>OBJECTIONS TO THIS OPTION:</p> <ul style="list-style-type: none"> • Need to consider revising the Northern Fringe East to

	<p>include the Fen Road area;</p> <ul style="list-style-type: none"> • Need for flexibility to be built into any site specific policy for the area to ensure that redevelopment proposals can respond to market conditions operating at the time of delivery of development; • Need to clarify the boundaries of the site; • Need to clarify the approach to building heights in this location; • Need for detailed environmental assessment to ensure no adverse effects.
<p>Question 4.45 What should the boundary be for this area?</p>	<ul style="list-style-type: none"> • The railway sidings and the land between the railway and Fen Road should be included leaving the river corridor between Fen Road and the river; • Bounded by the A1309, the line of the former railway line to the south of the Cambridge Business Park, the River Cam, taking in both sides of Fen Road, and the A14; • The railway line to the East should be the boundary, but the plan must allow for road access to Fen Road across the railway line; • The boundary should include Chesterton Fen, with a common interest in waste recycling and vehicle maintenance; • The boundary should include Chesterton Fen, there is scope for marina development independent of the CamToo project; • The boundary for commercial use should extend east of the railway up to Fen Road with an appropriate link road. To the east of Fen Road, it could be developed as a nature reserve; • The whole area on the map should be included; • No further than the city's northern boundary.
<p>What should be the vision for the future of this area?</p>	<ul style="list-style-type: none"> • Possibility for a trans-shipment centre to enable lorries of unsuitable sizes to be kept out of the city centre; • Science Park reaching maturity. A demonstration of sustainable development and as a flagship for the city of the 21st century; • Well-designed city district, with high-density buildings and areas of greenery. A good mix of locally owned shops, businesses and leisure facilities. Transport geared towards bicycles and pedestrians, with provision of the Chisholm Trail; • Preservation of the village of Chesterton with a prosperous community, incorporating industry, transport infrastructure, the commons, the river and leisure pursuits; • This is an area where more intensive development could provide real benefits and resolve adequate access to Chesterton Fen at the same time. It is also a site where taller buildings could be appropriate as long as they do not overpower Chesterton; • Planning of Northern Fringe East must take the Fen Road area into account, particularly in terms of transport infrastructure; • The operation of the waste water treatment works must not

	<p>be prejudiced by any other development in the area;</p> <ul style="list-style-type: none"> • The new station should meet the highest standards of design. Car parking should be multi-storey and partly underground. Space above the station should be used for shops and offices. The road layout should be planned strategically using minimum space. Separate road access to Chesterton Fen should be provided and pedestrian and cycle access points carefully considered to minimise the impact on existing residents and green spaces; • Area needs to be considered as a key transport interchange.
<p>What should the key land uses be within this area?</p>	<ul style="list-style-type: none"> • Employment-led, rather than provision of housing for commuters; • Provision of the community stadium at Northern Fringe East; • Sustainable industry with some on-site retail provision; • Residential, with supporting transport infrastructure; • Mixed use development incorporating employment, retail and residential uses; • Upgraded waste water treatment works, mixed use to maximise benefits of the station development and upgraded sewerage; • Upgraded transport infrastructure, particularly for Fen Road area; • Waste compatible development near to wastewater treatment works and safeguarding of land for sustainable transport infrastructure.
<p>Do you think land in this area should be safeguarded for sustainable transport measures?</p>	<ul style="list-style-type: none"> • Support for safeguarding land for sustainable transport measures; • Support for provision of the new railway station as part of a key transport interchange; • Endorsement of the extension of the guided busway or similar dedicated link along the railway line to Cambridge Station; • Improved bus links; • Monorail provision could be revisited; • Cycle route provision is essential; • Impact on on-street parking in wider area needs to be dealt with; • A new river crossing for pedestrians and cyclists is desirable; • New bridleways should also be included.
<p>Are there any other reasonable alternatives that should be considered at this stage?</p>	<ul style="list-style-type: none"> • Provision of a Community Stadium; • Provision of residential development, with supporting transport and other infrastructure.

Cambridgeshire & Peterborough Memorandum of Co-operation

Supporting the Spatial Approach 2011-2031



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Introduction: What is the Cambridgeshire & Peterborough Memorandum of Co-operation?

Why was it produced?

The Cambridgeshire & Peterborough Memorandum of Co-operation has been produced by the local authorities to support the development of a coherent and comprehensive growth strategy across Cambridgeshire & Peterborough. It has been developed in response to the removal of the statutory strategic planning tier⁹.

This Memorandum builds upon a strong legacy of the local authorities working together, most notably in producing the Cambridgeshire & Peterborough Structure Plan 2003, which first set out the current spatial strategy for the wider area, and continuing through the East of England Plan and joint development strategy statements published in 2010 and 2012 (the 2012 Joint Statement is included as an appendix to this document).

What does it do?

The Memorandum aims to contribute to the achievement of sustainable development in Cambridgeshire & Peterborough, in accordance with the National Planning Policy Framework (NPPF). Delivering sustainable development necessitates the local authorities actively working together across boundaries to “meet the development needs of their area”¹⁰. This collaborative approach is enshrined in the duty to co-operate included in the Localism Act 2011. Appendix 1 reflects the outcomes of co-operation across the wider housing market area to establish the levels of provision for additional housing.

Recognising the primary role that individual local authorities have in addressing the duty to co-operate through their statutory Local Plans, the overarching aim of the Memorandum is to provide *additional* evidence that the duty has been addressed. It does this by demonstrating that the emerging district-level development strategies contribute to an area-wide strategic vision, objectives and spatial strategy, and by addressing strategic spatial planning issues across the area. In this sense it fulfils the role envisaged for jointly-prepared, non-statutory documents in the NPPF¹¹.

What topics does it cover?

The Memorandum sets out the vision and objectives for the long-term development of the area, an overview of the evidence for future levels of growth, and the broad spatial approach that will help realise the vision and the area’s growth needs. These issues form this first part of the Memorandum, published in Spring 2013 to support the submission of Local Plans.

Additionally, a second part will address the main strategic planning priorities identified in the NPPF¹² (see Figure 1 below). To ensure that the Memorandum is truly strategic, and therefore complementary to the emerging Local Plans, issues arising under each priority have been tested to assess whether they meet the principle of “greater than local”; that is, whether the issue affects more than one district. This second part of the Memorandum will be available later in 2013.

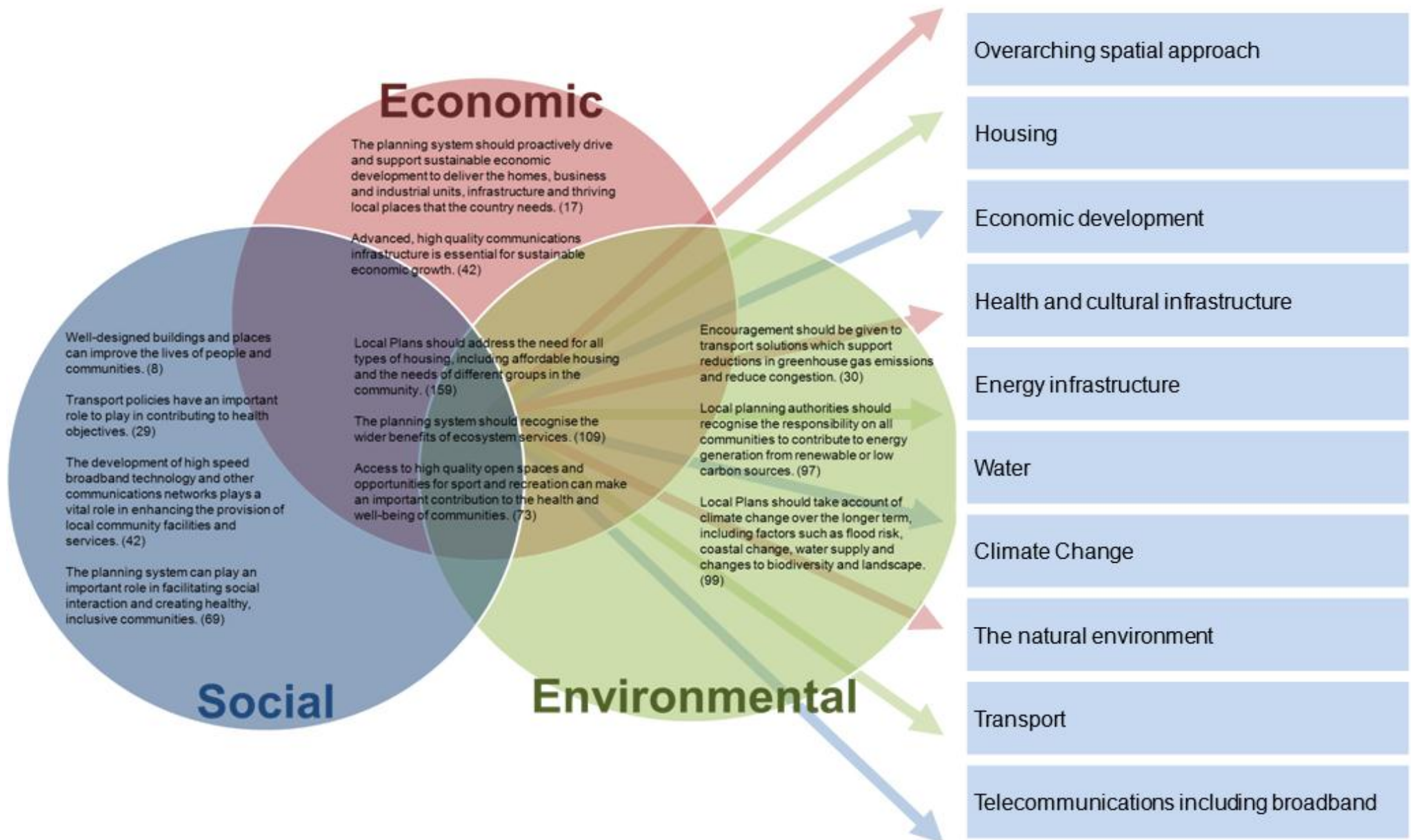
⁹ The East of England Plan was revoked in January 2013.

¹⁰ *National Planning Policy Framework*, paragraph 14.

¹¹ *Ibid*, paragraph 181.

¹² *Ibid*, paragraph 156.

Figure 1: Strategic priorities and the dimensions of sustainable development



What doesn't the Memorandum do?

In keeping with the principles of localism, this document respects the sovereignty of emerging Local Plans. Therefore, it does not set levels or locations for development or include prescriptive or directive policies.

What area does it cover?

The Memorandum focuses on the county of Cambridgeshire and the city of Peterborough. This area is covered by seven local authorities who worked together to create this document. These authorities are:

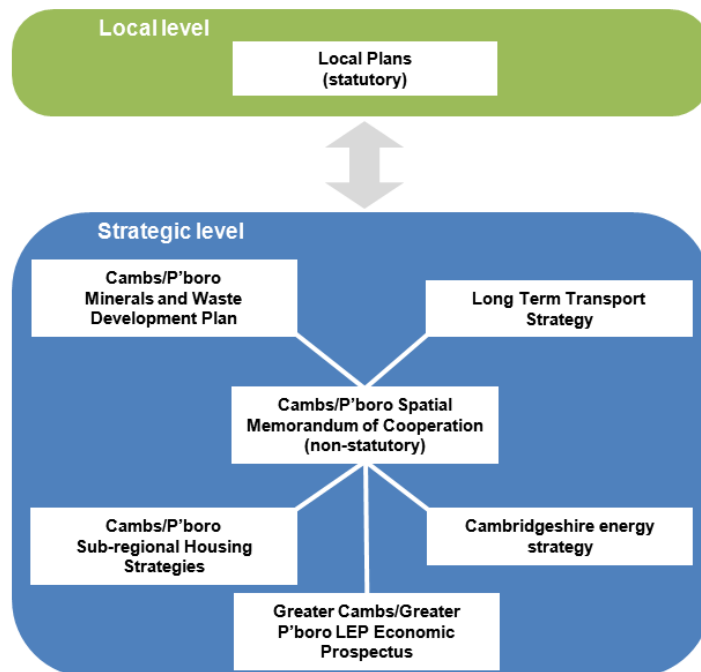
- Cambridge City Council
- Cambridgeshire County Council
- East Cambridgeshire District Council
- Fenland District Council
- Huntingdonshire District Council
- Peterborough City Council
- South Cambridgeshire District Council

However, in line with the NPPF, the Memorandum takes account of several different functional geographies which overlap the Cambridgeshire & Peterborough area. These include the Greater Cambridge Greater Peterborough Local Enterprise Partnership area, the respective Housing Market Areas for Cambridge and Peterborough, as well as the business planning areas covered by utilities providers and other stakeholders.

Who contributed to it?

The work has been developed alongside the LEP Economic Prospectus and the Cambridgeshire Long Term Transport Strategy. Figure 2 provides the context for the development of this strategic Memorandum.

Figure 2: Context of strategic planning work



What time-period does it cover?

This document mirrors current Cambridgeshire & Peterborough Local Plan horizons, looking for the most part to 2031, although it accounts for Huntingdonshire District Council's Local Plan horizon of 2036.

Spatial Portrait

The area covered by this Memorandum contains two cities, Cambridge and Peterborough, together with a number of market towns and numerous villages. Cambridge is at the heart of a city region of international importance and reputation. It includes a world-class university, a strong knowledge-based economy and a built and natural environment that is second to none. Peterborough has a wide sphere of influence based around its diverse economy, good strategic road and rail links and is gaining momentum towards realising its ambition of being national 'environment capital'. The area's economy has, as a whole, historically outperformed the national and regional economy and this continues to be the case, despite the challenges brought about by recession. However, economic prosperity is not spread evenly.

Many of the market towns in the south, including Huntingdon, St Neots and Ely, look to the Cambridge economy and services, although they continue to develop and strengthen their own local economies, retail and service offers. To the north there is a stronger relationship between places such as Ramsey and Whittlesey with Peterborough, while Wisbech is closer to King's Lynn.

The area contains a diverse range of natural environments. The Ouse and Nene Washes are of international importance for wildfowl and migratory birds, whilst low-lying fenland areas provide unique landscapes. Significant new and expanded habitat and green-space creation is a major objective for the area. Strategic examples include the award-winning Great Fen and Wicken Fen.

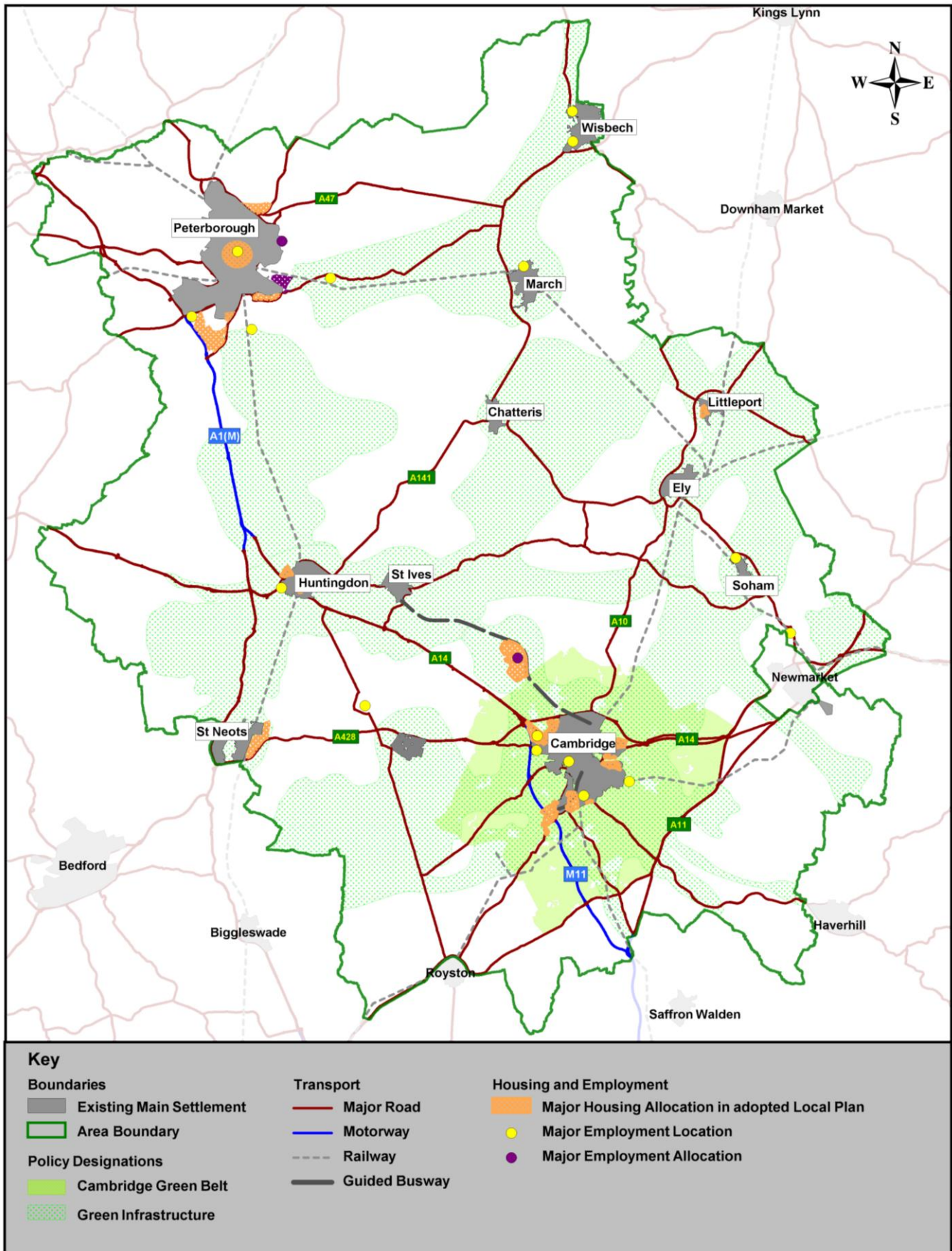
The area's economic strengths and related population growth have led to significant and continued pressure for growth over recent times. The development strategy established in the 2003 Structure Plan is currently being implemented, with major urban extensions and the new town of Northstowe coming forward. Cambridge University is planning a strategic expansion area to the north-west of the city, while the Addenbrookes biomedical campus has enhanced the institution's international reputation. Peterborough continues to implement a significant growth strategy through urban extensions, development at district centres and major city centre regeneration.

Housing affordability is acute in many parts of the strategic area, particularly to the south focused on Cambridge. It remains an important objective for the authorities to maximise affordable housing provision to support the social and economic well-being of the area and local communities.

The strategic road network is extremely busy and a number of key routes suffer congestion at peak times, particularly as a result of out-commuting from parts of the area. This reflects a need to create sustainable patterns of development, including access to public transport and a balance of jobs and homes.

The local authorities are working with government to address the current capacity challenges on the A14. There have been some successes in public transport, with the opening of the Cambridgeshire Guided Busway, Peterborough's TravelChoice Initiative, and increased use of park and ride services. However, public transport services and use vary across the county. In rural areas, bus services tend to be less frequent with longer journey times, therefore these areas often rely on the private car for transport. The area is well served by the strategic rail network, with the East Coast Main Line, Fen Line and others providing links to London, Ipswich, Norwich and further afield. Recent years have seen an increase in rail patronage.

Cambridgeshire & Peterborough in 2011



Scale (at A4): 1:400000

For more information please contact:
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Economic and Demographic Framework: estimating development needs in the future

Evidence sources

Government policy requires local planning authorities to provide for the homes that the local population will need in the future. The principal sources of evidence for estimating how many people and jobs there will be in the future, and therefore how many homes will be needed, are demographic and economic projections and forecasts. No model can predict the future with absolute accuracy, but such forecasts provide the best estimate of future change using the data available. The Cambridgeshire authorities have considered housing demand across the Housing Market Area using a variety of national, sub-national and local models. The outputs from these, together with a wide range of other factors, are reflected in the Strategic Housing Market Assessment.

A robust yet pragmatic approach to using these projections must be applied, recognizing the inherent uncertainty in predicting future trends, while needing to plan for a particular number of jobs and houses. The approach taken to assessing housing need and demand is set out in detail in the Cambridge sub-region Strategic Housing Market Assessment 2012, chapter 12.¹³

How many people?

Population growth is comprised of natural change (births and deaths) and migration (people moving in and out of an area). The assessment of population growth that has been undertaken takes account of economically-led population projections as well as demographically-led ones. Analysis of these projections suggests that 2011-31 there will be an increase of roughly 144,000 people in Cambridgeshire. Around 84% of this population growth is projected to consist of in-migration, a sign of the area's economic strengths and attractiveness to those seeking work.

Figure 3: Projected population change 2011-31

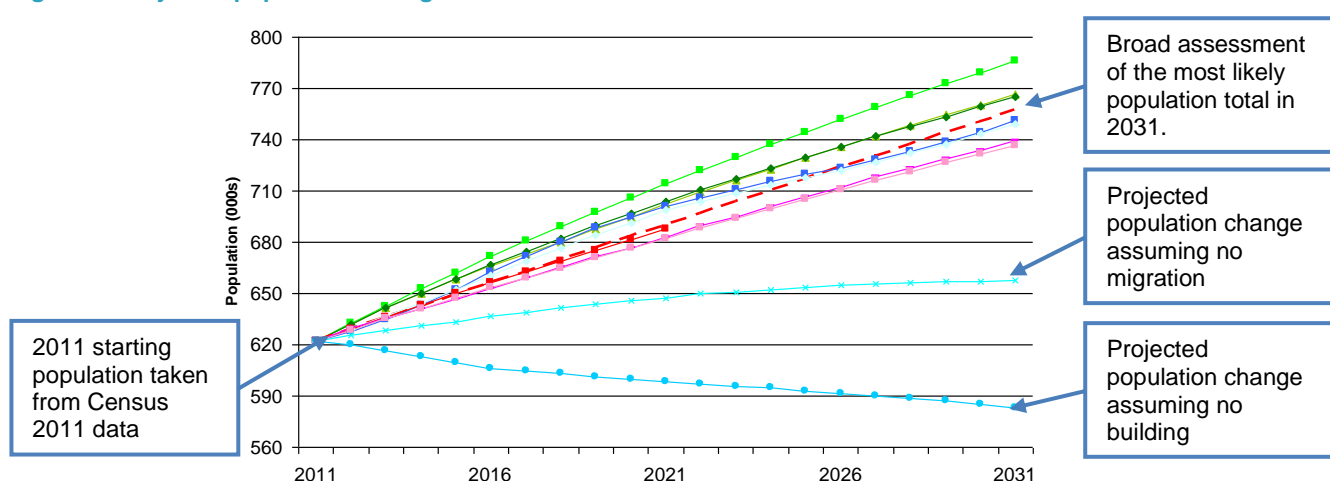


Table 1: Projected population change 2011-31

Area	2011	2031	Increase
Cambridgeshire	623,000	767,000	144,000

¹³ Visit www.cambridgeshireinsight.org.uk/housing to view the Cambridge sub-region SHMA.

How many jobs?

The two available economic models¹⁴ that project jobs numbers 2011-31 predict different trends of jobs change as the economy responds to the current recession. However, they show a similar total increase 2011-31 in the number of jobs arising in Cambridgeshire and Peterborough (see Fig. 4). In terms of employment sectors, both models forecast strongest jobs growth in financial and business services, and jobs decline in manufacturing. These baseline forecasts don't include assumed jobs growth at Alconbury Enterprise Zone, which should result in a further 8,000 jobs. The conclusion that can be drawn is that the Cambridgeshire and Peterborough economies will continue to perform strongly in a regional and national context, despite on-going economic challenges.

Figure 4: Projected Jobs Growth 2011-31

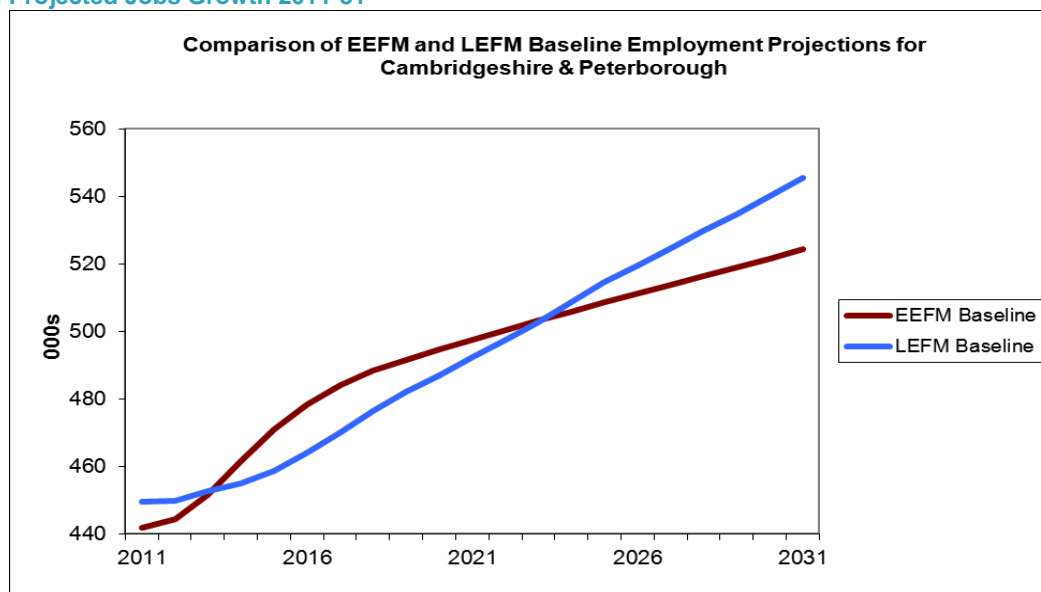


Table 2: Projected jobs growth 2011-31

Area	2011	2031	Increase
Cambridgeshire	325,000	396,000	71,000

How many homes?

The number of homes that are likely to be needed between 2011-31 is based upon our understanding of the jobs and people that will be in the area, as discussed above. These are derived from taking population figures at 2031 and applying assumed occupancy levels to achieve an indicative housing figure. The totals produced suggest that there will be a need 2011-31 for some 75,000 more homes in Cambridgeshire.

Table 3: Projected housing increase 2011-31

Area	2011	2031	Increase
Cambridgeshire	260,000	335,000	75,000

¹⁴ The East of England Forecasting Model, Spring 2012 run (EEFM Baseline in Figure 4), and the Local Economy Forecasting Model spring 2012 run (LEFM Baseline in Figure 4).

Peterborough

Peterborough's Local Development Framework, adopted in 2011, plans to provide 25,450 homes and 18,450 jobs between 2011 and 2026.

Spatial Vision

By 2031 Cambridgeshire and Peterborough will:

Offer attractive homes, jobs and a high quality of life in a range of distinctive urban and rural communities. This will provide opportunities for all residents and workers to achieve their maximum potential, and will facilitate healthy and sustainable lifestyles.

Have grown sustainably by locating new homes in and close to Cambridge and Peterborough and to other main centres of employment, including through planned urban extensions, and along key dedicated public transport routes, while avoiding dispersed or isolated new development which can increase unsustainable travel and restrict access to key services and facilities.

Be acknowledged as a world leader in innovation, new technologies, and knowledge-based business and research: yet more diverse in its economy across the area; including the expansion of appropriate-scale manufacturing and low carbon technologies, within and close to the main urban areas and at the Enterprise Zone at Alconbury.

Support the educational attainment and skills needed to realise the area's economic potential, via improved provision for further and higher education. In particular, the universities in Cambridge and Peterborough will have maintained and enhanced their reputations at national and international level as providers of high quality education and training.

Benefit from integrated transport networks, including being served by frequent high quality public transport within and between Cambridge, Peterborough and the market towns and district centres. There will be a closer relationship of homes to jobs and services, access to high quality routes for cycling and walking and good links to the countryside. A new station to the north of Cambridge and an enhanced east coast mainline will increase public transport accessibility, including to London.

Be an exemplar of low carbon living, efficient use of resources, sustainable development and green infrastructure; founded on Peterborough's eco-cluster and environment capital aspirations, Cambridge's emerging clean-tech cluster, the retention of Cambridge as a compact city, the development of Northstowe and the sustainable expansion of market towns and district centres with close links to village communities.

Be outstanding in the conservation and enhancement of its urban, rural and historic environment including vibrant city centres, attractive market towns, spacious fen landscapes, river valleys and a high degree of biodiversity.

Be well prepared for the impact of climate change and highly adapted to its effects, especially in the extensive low lying areas.

Spatial Objectives

<p>Development and growth</p>	<p>Plan for an overall level of growth that will support the economic, social and environmental needs of the area and result in sustainable patterns of development. Growth will need to be supported by:</p> <ul style="list-style-type: none"> a) Making best use of existing transport and other infrastructure (including ICT) b) Future investment in transport and other necessary infrastructure to be provided by developer contributions and other identifiable resources. A strategic infrastructure plan will identify key priorities across the area together with likely sources of funding. <p>Transport investment will be focussed on facilitating sustainable modes of travel or improving essential access in growth areas to make optimum use of the resources likely to be available.</p>
<p>Housing</p>	<p>Provide for a level and quality of housing growth to support the economic prospects and aspirations of local areas, while contributing to sustainable patterns of development across Cambridgeshire and Peterborough and to the health and well-being of communities.</p> <p>Support the delivery of a high proportion of affordable homes, including homes of various sizes, types, tenures and costs to provide for the diversity of the area's housing and economic needs. The aim is to support the creation of mixed, balanced and cohesive communities.</p>
<p>Economic Development</p>	<p>Economic prosperity will be promoted throughout the area. New development will be encouraged that:</p> <ul style="list-style-type: none"> • supports the growth of a sustainable low carbon economy in Cambridgeshire and Peterborough; • strengthens Peterborough and Cambridge's environment clusters, and both areas' high technology and knowledge-based clusters; and • is in locations that improve the alignment between homes and jobs. <p>Sustainable economic regeneration will be encouraged, particularly in Peterborough city centre, northern Cambridgeshire (for example, in the Nene port area), the rural areas and the urban centres of market towns.</p>
<p>Transport</p>	<p>Sustainable transport opportunities will be required as a key component of new development.</p> <p>All growth and infrastructure investment is to be planned to minimise the need for unnecessary travel. Where travel and mobility is beneficial or essential, the use of public transport or cycling and walking is to be given priority.</p> <p>Home working, remote working and IT developments that reduce the need to travel are to be facilitated, including through Broadband.</p>

Other infrastructure	<p>The Connecting Cambridgeshire project (including Peterborough) will support economic growth and reduce the digital divide by providing superfast broadband access to at least 90% of existing premises, and better broadband to the rest, by 2015.</p> <p>Take a coordinated and forward-looking approach to energy, including generation, distribution and use. Renewable energy opportunities will be proactively identified and delivered. New development will achieve high energy efficiency standards, and opportunities for on-site energy generation will be considered where relevant</p>
Water	<p>Take a co-ordinated approach to water through water cycle studies to address water supply, quality, wastewater treatment and flood risk. High standards of water efficiency should be achieved in new development and flood risk assessments should be used effectively to ensure development is located appropriately.</p>
Community and cultural infrastructure	<p>Development should promote opportunities for a high quality of community life, including access to work opportunities, community facilities, safe walkable streets and a network of open spaces and green infrastructure.</p> <p>Cultural diversity, recreation and the arts are an integral part of existing and new communities and relevant facilities should be provided through new development.</p> <p>Priority will be given to regeneration and renewal in disadvantaged or declining communities.</p> <p>Community involvement will be essential to the design and implementation of all new communities and major developments.</p>
Climate Change	<p>Ensure that the overriding need to meet the challenge of climate change is recognised through the location and design of new development, ensuring that it is designed and constructed to take account of the current and predicted future effects of climate change. This includes achieving the highest possible standards in reducing CO₂ emissions in the built environment and transport choices.</p>
The Natural Environment	<p>To conserve and enhance the environment of Cambridgeshire and Peterborough in relation to:</p> <ul style="list-style-type: none"> • landscape and water resources (including the Cam, the Great Ouse and Nene and associated Washes) • habitats and species (biodiversity) • public access to and enjoyment of the County's environmental assets in urban and rural areas (green infrastructure) • minimising waste and pollution.

Spatial Approach

Background

The existing development strategy originated in the Cambridgeshire and Peterborough Structure Plan 2003 and with the support of all of the Cambridgeshire local authorities was incorporated in the East of England Plan (the Regional Spatial Strategy) published in 2008. These strategic plans informed the development of the City and District Councils' current Local Plan and Local Development Frameworks.

The key objective of the strategy is to secure sustainable development by locating new homes in and close to Cambridge and Peterborough and to other main centres of employment, while avoiding dispersed development which increases unsustainable travel and restricts access to key services and facilities. Further sustainable locations for growth focus mainly on Cambridgeshire's market towns and Peterborough's city and district centres, with one large new town (Northstowe) to be connected to Cambridge and other key locations through a new dedicated public transport option, the Cambridgeshire Guided Busway.

Implementation of the strategy is on-going, with new urban extensions being delivered in Cambridge and Peterborough. Furthermore, the Busway is now operational and major developments, essential regeneration and infrastructure provision in Cambridgeshire's market towns continue to make positive progress.

The National Planning Policy Framework requires all local authorities to plan for sustainable development including planning positively for economic growth, with their local plans being prepared on the basis that objectively assessed development needs should be met. With the enactment of the Localism Act in 2011, all local authorities are now under a Duty to Co-operate in the preparation of their plans, both with each other and a range of other bodies.

Updating the Spatial Approach

The Cambridgeshire authorities are currently undertaking a review or roll forward of their existing plans. The need for this work results from a range of factors, including fostering continued economic growth, providing sufficient housing and the need for delivery of the necessary infrastructure to support the development of sustainable communities. The review or roll forward of plans will also need to take account of the fundamental changes that are likely to impact on the existing strategy – for example, the current unavailability of Cambridge Airport for housing development or the introduction of the Enterprise Zone at Alconbury. Peterborough City Council is not reviewing its existing development plan documents as these were recently adopted and provide an up-to-date and challenging growth strategy to 2026.

In undertaking the review or roll forward of their plans, the local authorities are clear that fundamentally they will continue to be guided by the strategic principles which underpinned the original growth strategy, first set out in the 2003 Structure Plan. Locating homes in and close to urban areas and to other main centres of employment is critical to ensure appropriate, sustainable development.

An updated approach across the area is informed fundamentally by an understanding of how much development is necessary over the defined period and where it will be located.

Collective work undertaken by the local authorities to understand future population levels and the development needs arising from this, estimates that some 75,000 homes and 71,000 jobs will need to be accommodated across Cambridgeshire by 2031. Peterborough is not reviewing its current plans and continues to address the challenging growth targets in its existing Core Strategy of 25,450 additional homes and 18,450 jobs by 2026.

Sustainable and deliverable locations and allocations in existing plans are likely to make up a significant proportion of the identified need for future land for homes and jobs. This is particularly the case where authorities have adopted core strategies or plans which have relatively long end dates. These existing allocations are founded on the principles of the existing overarching strategy and include development within and as major extensions to urban areas, and the planned new town of Northstowe.

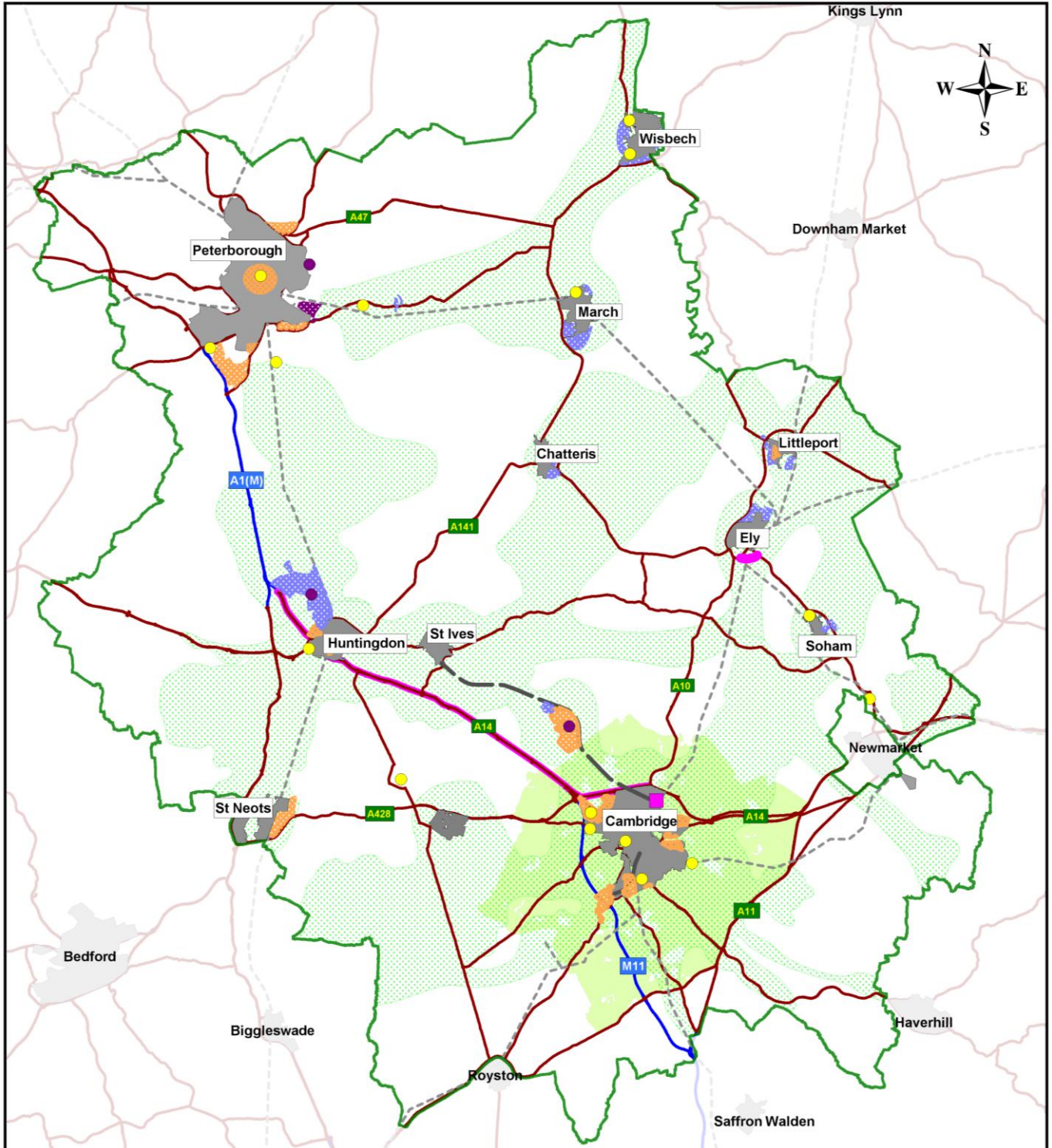
Further growth in Fenland will be directed towards the principal urban areas of March, Wisbech and Chatteris. A key objective is to ensure that growth complements and promotes sustainable economic regeneration. In East Cambridgeshire, a whole settlement masterplanning approach has been taken to planning for future development and this will lead to further planned development at Ely, Soham and to a lesser extent Littleport. The re-opening of Soham station and a southern bypass for Ely are important ambitions towards delivering sustainable growth. Increasing economic activity rates and diversifying the local economy remain important challenges in north Cambridgeshire as a whole.

Huntingdonshire will see a significant uplift in economic activity and population through the new Enterprise Zone on the former Alconbury Airfield. The increased population resulting from the creation of some 8,000 additional jobs will require a balanced and carefully planned approach to housing. Additional homes will be located close to these jobs and more generally population increases will be accommodated across the market towns and other sustainable locations. Ensuring sustainable travel choices are available is vital with the strategic scale of development anticipated at the Enterprise Zone. Key strategic elements could include a new rail station at Alconbury and links to the Cambridgeshire Guided Busway.

Cambridge and South Cambridgeshire have a strong geographic relationship. Interdependencies between the two administrative areas are well-established through the location of key employment sites and patterns of travel to work. Urban capacity within Cambridge will be an important source of future development opportunities. This includes expanded employment opportunities around the proposed new Science Park rail station to the north of the city. The authorities will need to consider carefully the balance of development across their areas, taking account of the purposes of the Cambridge Green Belt, the sustainability of existing settlements and the opportunities to create new settlements. It is not expected that any unplanned strategic scale development, including any additional new settlements, will be accommodated within Cambridgeshire once the local plans are adopted.

Creating sustainable transport links between the main urban areas and centres of employment is a current and longer term strategic aim. Key elements of this network are already in place with the Guided Busway and emerging plans for a new rail station to the north of Cambridge. The further development of these linkages will build on the area's economic strengths, including its good links to London. Eventually, this should enable sustainable movement between Cambridge, Northstowe, the Enterprise Zone and Peterborough. This enhanced public transport network will in turn provide a focus for future sustainable growth.

Cambridgeshire & Peterborough towards 2031



Key

Boundaries

- Existing Main Settlement
- Area Boundary

Policy Designations

- Cambridge Green Belt
- Green Infrastructure

Transport

- Major Road
- Motorway
- Railway
- Guided Busway
- New Major Transport Infrastructure

Housing and Employment

- Major Housing Allocation in adopted Local Plan
- Major Housing Allocation in Emerging Local Plan
- Existing Major Employment Location
- Major Employment Allocation

Scale (at A4): 1:400000

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Objectively Assessed Need for Additional Housing – Memorandum of Co-operation between the local authorities in the Cambridge Housing Market Area

1.0 Introduction

- 1.1 The National Planning Policy Framework (NPPF) requires local planning authorities to have a clear understanding of housing needs in their area. To achieve this, they should prepare a Strategic Housing Market Assessment (SHMA) to assess their full housing needs, working with neighbouring authorities where housing market areas cross administrative boundaries. The SHMA should identify the scale and mix of housing and the range of tenures that the local population is likely to need over the plan period¹⁵. This is a key part of the evidence base to address the NPPF requirement of ensuring that Local Plans meet the full, objectively assessed needs for market and affordable housing in the housing market area, as far as is consistent with the policies set out in the Framework¹⁶.
- 1.2 The Localism Act 2011 places a Duty to Co-operate on local planning authorities¹⁷. This requires them to engage constructively, actively and on an on-going basis in the preparation of development plan documents where this involves strategic matters. National policy in the NPPF adds to this statutory duty as it expects local planning authorities to demonstrate evidence of having effectively cooperated to plan for issues with cross-boundary impacts.

2.0 The Cambridge Sub-Region Housing Market Area

- 2.1 The Cambridge Sub Region Housing Market Area comprises all five Cambridgeshire districts (Cambridge City, East Cambridgeshire, Huntingdonshire, Fenland and South Cambridgeshire), plus the west Suffolk districts of Forest Heath and St Edmundsbury. Due to its historic and functional ties with Cambridgeshire, plus its own housing market area overlapping with the Cambridge Housing Market Area, Peterborough City Council has also collaborated with these local authorities.

3.0 Demonstrating the Duty to Co-operate

- 3.1 The seven districts within the housing market area, together with Peterborough City Council, have collaborated in recent months to meet the requirements of the NPPF set out in section 1.0. The outputs from this collaboration are a new chapter of the SHMA, which identifies the scale and mix of housing needed across the area by 2031 (and extending to 2036 for Huntingdonshire to meet its proposed local plan end date). Integral to this is a separate Technical Report, which provides an overview of the national, sub-national and local data drawn upon to inform the levels of housing need set out in the SHMA.
- 3.2 The outcome of this work is that an additional 93,000 homes are forecast to be needed across the housing market area between 2011 and 2031. The table below sets out the breakdown of this total figure in more detail.

¹⁵ National Planning Policy Framework, paragraph 159.

¹⁶ NPPF, paragraph 47.

¹⁷ Localism Act 2011, section 110.

All dwelling change 2011 to 2031

District	All dwelling change 2011 to 2031
Cambridge	14,000
East Cambridgeshire	13,000
Fenland	12,000
Huntingdonshire	17,000 (21,000 to 2036)
South Cambridgeshire	19,000
Cambridgeshire	75,000
Forest Heath	7,000
St Edmundsbury	11,000
Housing sub-region	93,000

Source: Strategic Housing Market Assessment

- 3.3 In determining housing targets in their local plans, local authorities should take account of the requirements of national policy and local circumstances.
- 3.4 In this regard, it should be noted that the Peterborough housing market area overlaps into Cambridgeshire. Peterborough is the largest urban centre within the travel to work area for the Cambridgeshire sub-region and is a major employment location with good transport links and infrastructure. On the basis of currently available figures, it has a net daily in-commute from Cambridgeshire of around 7,000 people. Peterborough has an up to date Local Plan (Core Strategy adopted in 2011 and a Site Allocations DPD adopted in 2012) with a substantial housing growth target of 25,450 between 2009-26.
- 3.5 Based on this background and engagement between all the local authorities listed in section 2.0, under the Duty to Co-operate, it is acknowledged by the authorities that Peterborough, in its up to date Local Plan, has already accommodated a proportion of the housing need arising in the Cambridge Housing Market Area, and it has been agreed that this proportion could reasonably be assumed to amount to approximately 2,500 homes (i.e. around 10% of its overall housing target).
- 3.6 Separately, Fenland and East Cambridgeshire District Councils have made considerable progress to date with their local plan reviews and, therefore, have established a good understanding of their areas' development opportunities and constraints. They have also taken account of the July 2012 joint statement by Peterborough and the Cambridgeshire authorities which confirmed that the 'strategy is to secure sustainable development by locating new homes in and close to Cambridge and Peterborough and to other main centres of employment, while avoiding dispersed development'¹⁸.
- 3.7.1 Based on all of the above, and agreement between all the local authorities working within the Duty to Co-operate, it has been agreed that, in their Local Plans, provision should be made for 11,000 dwellings in Fenland and 11,500 dwellings in East Cambridgeshire, rather than the full identified need set out in the table above.

¹⁸ Joint Statement on the Development Strategy for Cambridgeshire and Peterborough by the local authorities, July 2012.

3.7.2 Overall, and taking account of the 2,500 dwelling element of the Cambridge HMA's need already met in Peterborough's Local Plan, this leaves 90,500 dwellings to be provided in the Cambridge HMA to ensure that the full objectively assessed need for housing in the Cambridge HMA will be met in forthcoming Local Plan reviews. The level of provision to be made by district is set out in the table below.

All dwelling provision 2011 to 2031

District	All dwelling provision 2011 to 2031
Cambridge	14,000
East Cambridgeshire	11,500
Fenland	11,000
Huntingdonshire	17,000 (21,000 to 2036)
South Cambridgeshire	19,000
Cambridgeshire	72,500
Forest Heath	7,000
St Edmundsbury	11,000
Total	90,500

4.0 Conclusion

- 4.1 The purpose of this memorandum is to formally record and make public the local authorities' agreement under the Duty to Cooperate to the position as set out in this Memorandum, subject to ratification by their full Council as part of their individual Local Plan preparation.
- 4.2 The eight authorities that form signatories to this memorandum agree, therefore, that the figures in the table above (and taking account of provision already met within Peterborough) represent the agreed level of provision by district in order to meet the overall identified need for additional housing within the Cambridge Sub Region Housing Market Area.

Joint Statement on the Development Strategy for Cambridgeshire and Peterborough by the local authorities¹⁹

1.0 Introduction

- 1.1 In 2010 the Coalition Government announced its intention to abolish Regional Spatial Strategies (and by extension any 'saved' Structure Plan policies) and introduce a wholly locally-based planning system. In response to this changing policy environment the Cambridgeshire authorities issued a joint statement in autumn 2010 to set out their position in support of the existing, established development strategy for the County.
- 1.2 This statement updates and replaces that earlier one in the light of events since its publication in 2010. It is expanded to cover Peterborough in addition to Cambridgeshire, reflecting the history of joint working between the two areas, the shared objectives within the Local Enterprise Partnership, and the recent agreement to co-operate effectively and work together on strategic planning issues.

2.0 Background

- 2.1 The existing development strategy originated in the Cambridgeshire and Peterborough Structure Plan 2003 and with the support of all of the Cambridgeshire local authorities was incorporated in the East of England Plan (the Regional Spatial Strategy) published in 2008. These strategic plans informed the development of the City and District Councils' Local Plan and Local Development Frameworks, which currently are being implemented.
- 2.2 The key objective of the strategy is to secure sustainable development by locating new homes in and close to Cambridge and Peterborough and to other main centres of employment, while avoiding dispersed development which increases unsustainable travel and restricts access to key services and facilities. Further sustainable locations for growth focus mainly on Cambridgeshire's market towns and Peterborough's district centres, with one large new town (Northstowe) to be connected to Cambridge and other key locations through a new dedicated public transport option, the Cambridgeshire Guided Busway.
- 2.3 Implementation of the strategy is on-going, with new urban extensions being delivered in Cambridge and Peterborough. With the Busway now up and running, significant development activity is underway in

¹⁹ Cambridgeshire County Council, Cambridge City Council, East Cambridgeshire District Council, Fenland District Council, Huntingdonshire District Council, Peterborough City Council and South Cambridgeshire District Council.

Cambridge's southern and north-west fringes and an application for a first phase for the new town of Northstowe has been submitted. Major developments, essential regeneration and infrastructure provision in Cambridgeshire's market towns continue to make positive progress.

3.0 National and Local Developments

- 3.1 The National Planning Policy Framework, published recently, requires all local authorities to plan for sustainable development including planning positively for economic growth, with their local plans being prepared on the basis that objectively assessed development needs should be met. With the enactment of the Localism Act in 2011, all local authorities are now under a Duty to Co-operate in the preparation of their plans, both with each other and a range of other bodies.
- 3.2 The national economic situation has presented significant challenges in maintaining the pace of growth and the delivery of sufficient investment where it is most needed. In the face of these challenges, the Cambridgeshire and Peterborough local authorities have continued to take a positive attitude to delivery of the development strategy and have taken innovative approaches to funding challenges - for example, the equity investment in the southern fringe sites. This has enabled development to start earlier than would otherwise have been the case, whilst still securing a future financial return for the authorities, which can then be reinvested to support future high quality growth for the benefit of local communities.
- 3.3 The Greater Cambridge-Greater Peterborough Local Enterprise Partnership is now well-established and has secured the designation of an Enterprise Zone at the former Alconbury airfield. The County Council has also announced it is putting in place the funding to deliver a new rail station in the north of Cambridge, which will enhance public transport accessibility and provide some relief to congestion within the city. Work is now underway, led by the Department for Transport but working in partnership with the County and District Councils, to find a way forward for delivering improvements along the A14 corridor. The outcomes are critical in order to support a range of key development locations, including at Northstowe. An announcement from Government on the way forward is expected this summer.

4.0 The Response to these Challenges

- 4.1 Despite the clarity of and support for the existing development strategy, the local authorities realise the need to keep the broader, strategic perspective under consideration. As a result, all authorities except Peterborough City Council, which last year adopted a Core Strategy running to 2026, are undertaking a review or roll forward of their local plans.
- 4.2 The need for this work results from a range of factors, including fostering continued economic growth, providing sufficient housing and the need for delivery of the necessary infrastructure to support the

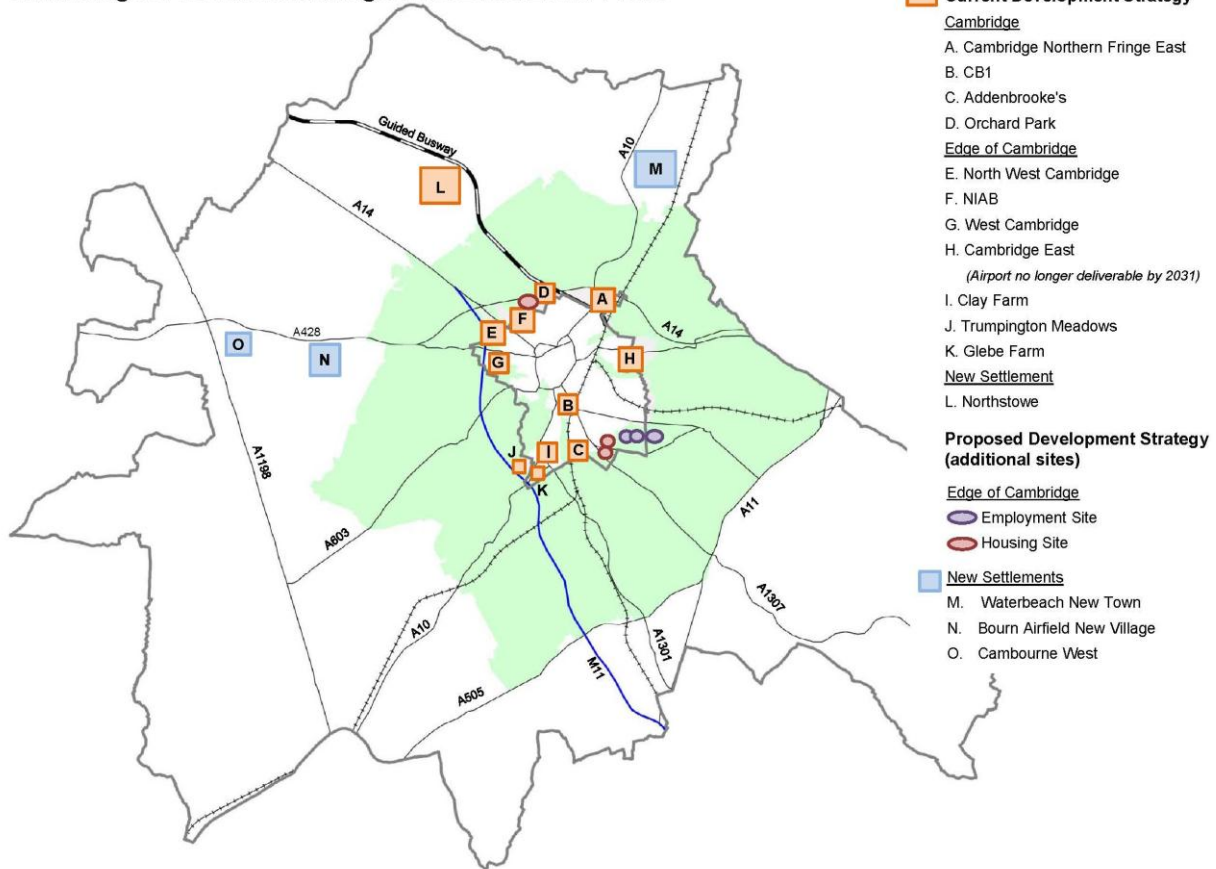
development of sustainable communities. The review or roll forward of plans will also need to take account of the fundamental changes that are likely to impact on the existing strategy – for example, the current unavailability of Cambridge Airport for housing development or the introduction of the Enterprise Zone at Alconbury. With regard to the Enterprise Zone the local authorities will need to consider and effectively respond to the wider spatial implications of that designation as a matter of urgency. Nevertheless, it is critical that a combined clear focus and effort remains on the effective delivery of the existing ambitious strategy and the major developments that are part of it; and to recognise that Cambridgeshire and Peterborough, as a whole, still have more than adequate land coming forward to effectively deliver sustainable growth, which can be continued as the strategy is updated.

- 4.3 Preparation of these updated plans will take account of policies outlined in the National Planning Policy Framework, including wide community engagement in accordance with the principles of localism. This will enable engagement around a range of development needs, including community-based, locally-generated proposals as well as those of more strategic significance. Furthermore, the local authorities will continue their long history of close collaboration and joint working as part of their Duty to Co-operate. This will include jointly gathering appropriate forms of evidence to both inform their plans and to shape the formulation of their strategies. Their work will be supported and constructively challenged at a strategic level by a newly-formed Joint Strategic Planning Unit. Close links to the Local Enterprise Partnership will also be further developed.
- 4.4 In undertaking the review or roll forward of their plans, the local authorities are clear that fundamentally they will continue to be guided by the strategic principles which underpinned the original growth strategy, first set out in the 2003 Structure Plan. Locating homes in and close to urban areas and to other main centres of employment is critical to ensure appropriate, sustainable development. It is essential, therefore, that the future development needs of the wider area are considered and agreed through a strategic plan-led approach, which takes account of identified local and national priorities.
- 4.5 Pending this review of the strategy, the local authorities are clear that they remain committed to delivering the existing planned strategy, and that significant capacity exists in terms of housing and employment land supply as we recover from the recession. During the transition period leading up to the introduction of their new, updated local plans, the local authorities will continue to give full weight to current, adopted planning policies.

July 2012

Appendix C: Map showing the suggested sustainable development strategy approach

Cambridge & South Cambridgeshire Draft Local Plans



Appendix D: Reviewing the Sustainable Development Strategy for the Cambridge Area

1. Cambridge City Council and South Cambridgeshire District Council are updating their Local Plans for the Cambridge area for the period up to 2031.
2. The existing development plans for the area are the Cambridge Local Plan (adopted 2006) and the South Cambridgeshire Local Development Framework (adopted between 2007 and 2010). They include a development strategy based on a sustainable development sequence focusing development on Cambridge, sites on the edge of Cambridge brought forward through a review of the Green Belt, a new town (Northstowe), and limited development in better served villages.
3. The updated local plans extend the plan period to 2031, and consider development needs for this period, and how they should be addressed. This paper considers the evolution of the development strategy for the Cambridge area, and how the preferred approach was identified.
4. It includes the following:
 - The Current Development Strategy for Cambridgeshire - How the existing strategy for development in the Cambridge area was developed.
 - Continuing a Sustainable Development Strategy – Considerations regarding how the strategy could be moved forward to 2031.
 - Considering Options for a new Development Strategy – How strategy options were considered through the Issues and Options process.
 - Existing Housing Supply – Details the existing supply of sites with planning permission or existing allocations, and how they relate to the development hierarchy.
 - Identifying New Site Options – How site options for testing were identified, how they were tested through the Sustainability Appraisal (SA) process, and how reasonable alternative allocations were distinguished from rejected options.
 - Identification of the proposed development strategy.

The Current Development Strategy for the Cambridge Area

5. Whilst regional and structure plans are no longer produced, throughout the plan making process South Cambridgeshire District Council has worked closely with Cambridge City Council. There is a strong interaction between the two administrative areas. South Cambridgeshire encircles Cambridge and many residents of the district look to the city for services and jobs.
6. The current development strategy for the Cambridge area stems from as far back as 1999, from the work undertaken by Cambridge Futures, which influenced the 2000 Regional Plan for East Anglia and the 2003 Cambridgeshire and Peterborough Structure Plan. Prior to that date, development in Cambridge had been constrained by the Green Belt. One of the effects of this constraint

was that housing development which would have taken place in Cambridge was dispersed to towns and villages beyond the outer boundary of the Green Belt, with people commuting back to jobs in Cambridge contributing to congestion, greenhouse gas emissions, air quality problems and other quality of life issues. The change in strategy introduced in the 2003 Cambridgeshire Structure Plan recognised that a significant change in the approach to the planning of the city was required in order to help redress the imbalance between homes and jobs in, and close to, Cambridge, whilst ensuring that the special qualities of Cambridge and the surrounding area which are protected by a Green Belt are maintained. It also needed to provide for the long-term growth of the University of Cambridge and Addenbrooke's Hospital, whilst minimising increases in congestion on radial routes into the city.

7. The existing Cambridge Local Plan (2006) and South Cambridgeshire Local Development Framework (adopted between 2007 and 2010) introduced a step change in levels of planned growth, unmatched since the interwar years. This was consistent with the agreed development strategy for the Cambridge area set out in the 2003 Cambridgeshire and Peterborough Structure Plan. The Plans released significant land from the Cambridge Green Belt and allocated a number of urban extensions to the city in the south, north west, north east and east of the city.
8. The strategy in the Cambridgeshire and Peterborough Structure Plan 2003 and carried into the two Councils' current plans aims to focus development according to a sustainable development sequence:
9. Current Development Sequence:
 1. Within the urban area of Cambridge
 2. On the edge of Cambridge
 3. In the new town of Northstowe
 4. At the market towns in neighbouring districts and in the better served villages.
10. The Cambridgeshire Structure Plan envisaged the following approach to Development following this sequence.

Structure Plan 2003 Development Sequence	Cambridge only	South Cambs Only	Cambridge and South Cambs	%
Cambridge	6,500	2,400	8,900	27
Edge of Cambridge	6,000	2,000	8,000	25
New settlement(s)		6,000	6,000	18
Villages		9,600	9,600	30
TOTAL 1999 to 2016	12,500	20,000	32,500	

11. The 2003 Structure Plan identified broad locations to be released from the Green Belt on the edge of Cambridge, which had been identified in Green Belt reviews as having less significance in terms of the purposes of the Cambridge Green Belt. The only exception to this was land in north west Cambridge to

meet the long term development needs of Cambridge University given its international significance. The strategy was put into effect through the Cambridge Local Plan, the South Cambridgeshire Local Development Framework, and the joint Area Action Plans for North West Cambridge and Cambridge East. All of these plans were subject to extensive periods of public consultation and examination by planning inspectors. The strategy was endorsed and included in the East of England Plan 2008. Significant progress is being made on the growth sites identified in the Councils' current plans, although progress was slowed just as sites were coming forward due to the effects of the recession when it took hold in 2008. However, almost all sites are now progressing well and are either under construction, with planning permission or at pre-application discussion stage.

12. At the heart of the strategy established in 2003 was the review of the Cambridge Green Belt which released land for a total of around 22,000 homes, of which some 10,000 to 12,000 were to be built at Cambridge East in both Cambridge and South Cambridgeshire. This included development that would take place beyond 2016 where it required the relocation of Cambridge Airport. In 2009, the landowner - Marshalls of Cambridge - advised that Cambridge Airport would not be made available in this plan period at least, as an appropriate relocation sites could not be found. This means that the major development opportunities at Cambridge East cannot be part of the development strategy in the new Local Plans, and so the full implementation of the current development strategy cannot take place in the plan period to 2031. Marshall has recently announced a renewed intention to develop the allocated site north of Newmarket Road for around 1,200 homes with a planning application expected in 2013 and development north of Cherry Hinton in both Councils' areas following later which the Councils consider could provide around 500 homes.

Continuing a Sustainable Development Strategy

13. Throughout the preparation of the existing plans, there was strong local acknowledgement of the growing need for future growth to follow a more sustainable spatial pattern of development in the Cambridge area to help mitigate commuting by car to jobs in and close to Cambridge and the resulting congestion and emissions, this included traffic restraint through the introduction of a congestion charge which was subsequently rejected.
14. As part of the review of the Regional Spatial Strategy (RSS) for the East of England, the Cambridgeshire authorities commissioned consultants to prepare the Cambridgeshire Development Study. The study was completed in 2009 and looked at how well the existing development strategy was working, forecasts for economic growth, taking account of the beginning of the downturn and how the strategy could be developed if further growth was needed.
15. The study identified a range of challenges for growth beyond the current development strategy. These included that significant additional expansion to Cambridge (where the economy is strongest) would impact on the integrity of

the Green Belt and the concept of Cambridge as a compact city. The study also concluded that without deliverable solutions for transport and land supply, Cambridge centred growth would be difficult to achieve, and would require a fundamental step change in traffic management and travel behaviour.

16. The study recommended a spatial strategy for Cambridgeshire that was based on delivering the current strategy with further balanced expansion through regeneration in selected market towns, and focussed on making best use of existing infrastructure. However, it did indicate that some additional growth could be located on the edge of Cambridge incorporating a limited review of the Green Belt boundary, in the long term. The key objective of the strategy was to locate homes close to Cambridge or other main employment centres, avoiding dispersed development, and ensuring that travel by sustainable modes is maximised through connections focussing on improved public transport and reducing the need to travel.
17. For the review of the development plans the Councils have considered whether the current strategy remains the most appropriate development strategy to 2031, or whether an alternative would be more suitable as a result of current circumstances. The interrelationship between Cambridge and South Cambridgeshire means that decisions cannot be taken in isolation and the future approach needs to remain joined up, as it has been in the past. This is also now a requirement on the authorities under the Duty to Cooperate introduced by the Localism Act 2011. On the whole, South Cambridgeshire looks towards Cambridge in functional terms whilst Cambridge is affected by a tight administrative boundary and surrounding Green Belt, and therefore any decision relating to the spatial strategy in South Cambridgeshire is likely to have an impact on Cambridge and vice versa.
18. The Councils have reviewed jointly how far the current sustainable development strategy has progressed, what evidence there is that it is achieving its original objectives and what a new sustainable development strategy looks like in view of changes in economic and other circumstances since the current strategy was adopted. It must balance the three strands of sustainability – economic, social, and environmental.
19. For plan making, Councils are required to positively seek opportunities to meet the objectively assessed development needs of their area in a flexible way, unless any adverse impacts of doing so would significantly and demonstrably outweigh the benefits.
20. Where Green Belts are defined, they should only be altered in exceptional circumstances when preparing a Local Plan. When reviewing Green Belt boundaries, Councils are required to take account of the need to promote sustainable development and consider the consequences for sustainable development of channelling development towards urban areas within Green Belts, to villages inset within the Green Belt and to locations beyond the Green Belt.

21. This sets a considerable challenge for the Cambridge area, in the context of:
- A strong and growing economy;
 - The need for new homes to support the jobs and the aim to provide as many of those new homes as close to the new jobs as possible to minimise commuting and the harmful effects for the environment, climate change and quality of life that it brings; and
 - A tightly drawn Green Belt to protect the unique character of Cambridge as a compact, dynamic city with a thriving historic centre, to maintain and enhance the quality of its setting, and to prevent it merging with the ring of necklace villages, that helps underpin the quality of life and place in Cambridge, fundamental to economic success
22. Achieving an appropriate balance between these competing arms of sustainable development is a key objective of the development strategy for the new Local Plans.

Note: The amount of development that should be planned for is addressed separately and not in this document.

Sustainable Development Strategy Review

23. The current sustainable development strategy was extensively scrutinised and challenged during its evolution through the regional plan and structure plan into the Cambridge Local Plan and South Cambridgeshire Local Development Framework (LDF). Independent planning inspectors confirmed it as the most sustainable development strategy for the two Districts to 2016 and beyond.
24. Moving forward into the new Local Plans and having regard to the new Duty to Co-operate, the recently established Cambridgeshire Joint Strategy Unit has worked with the Councils to carry out a further review of the sustainable development strategy for the two Councils' areas. Overall, the Cambridge and South Cambridgeshire Sustainable Development Strategy Review document concludes that the development strategy in the Cambridge Local Plan and the South Cambridgeshire LDF remains the most sustainable for the two areas, subject to striking the right balance between meeting the needs and demands for new homes and jobs, with environmental, infrastructure and quality of life factors. The most sustainable locations for development are within and on the edge of Cambridge and then in one or more new settlements close to Cambridge, which are connected to the city by high quality public transport and other non-car modes. Development in market towns (outside Cambridge and South Cambridgeshire) scores broadly similar to new settlements although travel distances are much further making non-car modes potentially less attractive than new settlements. Development in villages is the least sustainable option and only appropriate in the larger better served villages with good quality public transport.

25. The review concluded that in addition to the key sustainability considerations of proximity to employment, services and facilities and access to good public transport, the central themes that emerge from this broad assessment are:
- The need to have regard to the scale of development that is planned at different locations, not least to ensure that development allocations do not undermine the delivery of the existing sustainable development strategy and lead to a return to unsustainable patterns of development;
 - Its ability to deliver the necessary infrastructure to create sustainable communities; and
 - Overall delivery implications and timescales.
26. Whilst the new Local Plans need to add some supply to the significant existing supply of housing, planning permission already exists for more employment development than is forecasted by 2031. Whatever decisions are made on supplying additional houses, jobs growth will continue. The challenge will be to develop Local Plans that deliver a sustainable development strategy that balances employment growth with good quality and deliverable travel options with short journey times from the key locations for new and existing homes. Consideration also needs to be given to the special character of Cambridge and quality of life for existing and future residents.
27. In its National Planning Policy Framework (NPPF), the Government carries forward the advice from earlier Planning Policy Statements that, when drawing up or reviewing Green Belt boundaries, local planning authorities should take account of the need to promote sustainable patterns of development. They should consider the consequences for sustainable development of channelling development towards urban areas inside the Green Belt boundary, towards towns and villages inset within the Green Belt or towards locations beyond the outer Green Belt boundary. As part of preparing new Local Plans and given the change in circumstances since the current development strategy was agreed, it was therefore considered appropriate to look again at the inner Cambridge Green Belt boundary in order to establish whether there were any more options for development that should be consulted on.

Considering Options for a new Development Strategy

28. The Issues and Options consultations sought comments on whether the current development strategy remains the soundest basis for development in Cambridge and South Cambridgeshire for the period to 2031.

Cambridge

29. The Cambridge Issues and Options Report 2012 focussed on the City Council's area by assessing options for continued development within the urban area as well as exploring whether there should be further development on the edge of Cambridge in the Green Belt. This included:

- Whether there should be more development than is already committed in the 2006 Local Plan on the edge of Cambridge?
 - Should more land be released from the Green Belt?
 - If so, where should this be? Ten broad locations around Cambridge were included in the consultation document.
 - Whether there were any other approaches that should be considered at this stage?
30. There was also strong acknowledgement of the good progress that is being made towards implementing the current strategy, with development progressing on fringe sites on the edge of Cambridge.

South Cambridgeshire

31. The South Cambridgeshire Issues and Options 2012 consultation included a question on how the sustainable development strategy should be taken forward.
32. It explained that any development strategy for South Cambridgeshire needs to recognise the links with Cambridge, particularly in terms of providing employment to support the successful economy of Cambridge and South Cambridgeshire, and housing to provide opportunities for the workforce, both existing and new, to live close to where they work. As with the current strategy, the updated Local Plan is likely to need to be a combination of sites at different stages in the sequence in order to meet housing targets and in particular some village housing developments to provide a 5-year supply, given the long lead in time for new major developments which would realistically only start to deliver later in the plan period.
33. The options for the development strategy consulted on that lie within South Cambridgeshire were to:
- Focus on providing more development on the edge of Cambridge, in part to replace Cambridge East, through a further review of the Green Belt.
 - Focus on providing more development through one or more new settlements, of sufficient size to provide sustainable development, including provision of a secondary school, and with good public transport links to Cambridge.
 - Focus on providing development at the more sustainable villages that have the best levels of services and facilities and accessibility by public transport and cycle to Cambridge or, to a lesser extent, a market town.
 - A combination of the above.

Cambridge and South Cambridgeshire

34. Through the joint consultation in 2013, the Councils sought views on the appropriate balance between protecting land on the edge of Cambridge that is of high significance to Green Belt purposes, and delivering development away from Cambridge in new settlements and at better served villages

35. The majority of representations were that the Green Belt should be protected from further development. Development should be concentrated in new settlements and better served villages, to reduce congestion and avoid pressure on village infrastructure. Further urban extensions received a more limited level of support.

The Sustainability Appraisal of Strategic Approaches

36. The Sustainability Appraisal process has also been a key element of considering the relative merits of different strategic approaches.
37. Building on the Sustainability Appraisals supporting each of the Issues and Options consultations, Appendix 1 of this report includes a high level assessment of the sustainability implications of focusing on different stages of the development sequence (Cambridge Urban Area, Edge of Cambridge, New Settlements, more Sustainable villages, and less sustainable villages).
38. In outline, the benefits of utilising land within the urban area of Cambridge are the re-use of previously developed land and reducing the need for greenfield development. It also delivers housing closest to the highest concentration of jobs, services and facilities.
39. Development on the edge of Cambridge is the next closest option to the City, but would require use of greenfield land in the Green Belt. The purposes of the Cambridge Green Belt recognise the qualities and importance of the area for the landscape and townscape setting of the City and surrounding villages. The Green Belt review has shown that significant additional development would be detrimental to these purposes.
40. New settlements offer the opportunity to focus development in a way that would support delivery of new services, facilities and employment to meet the needs of residents. Whilst there would still be travel to Cambridge they offer a higher degree of self-containment than more dispersed strategies. They would enable the delivery of focused transport improvements, to deliver a higher share of travel by sustainable modes than more distributed strategies, although they would also focus traffic into specific corridors.
41. Village based strategies would disperse growth. It may enable incremental improvements to existing services and transport, but would provide less focus for delivery of high quality services, and could put pressure on existing village services where expansion could be challenging. There would be less access to high quality public transport, and the modal share of travel by car would be higher.

Existing Housing Supply

42. Notwithstanding the loss of a significant number of homes at Cambridge East, a significant supply of housing has already been identified through existing plans. This includes land with planning permission, and land that was identified and allocated in previous plans which remain available, suitable and deliverable, with these attributes being tested through Annual Monitoring Reports.

Within Cambridge

43. Since 2011, 280 homes have been built within the urban area of Cambridge. At the end of March 2013 there was an existing supply of 2,698 homes in Cambridge City Council's urban area of Cambridge either with planning permission or outstanding allocations. This excludes the major developments on the edge of Cambridge in the current Local Plan 2006, that are considered under the edge of Cambridge stage below. Orchard Park also forms part of the urban area of Cambridge, having been released in an earlier plan, although it lies within South Cambridgeshire. It is largely built, but a further 309 dwellings are expected to be built between 2011 and 2031. There is therefore a total existing supply of 3,287 homes within the urban area of Cambridge.

On the edge of Cambridge

44. Since 2011, 51 homes have been built at Trumpington Meadows and NIAB1. A further 11,310 new homes are already identified through the combined land released from the Green Belt in the Cambridge Local Plan 2006 and South Cambridgeshire LDF adopted between 2007 and 2010. This is a major part of the current development strategy and will remain so in the new Local Plans. After stalling at the beginning of the economic downturn, good progress in relation to the development of the fringe sites has been, and continues to be made. There is therefore a total existing supply of 11,361 homes on the edge of Cambridge.

New settlements

45. The new town of Northstowe is a key part of the current strategy. The town will comprise 9,500 dwellings in total, of which 5,965 are anticipated to come forward by 2031. Northstowe is located on the Guided Busway and will have good public transport links to Cambridge but at present the guided buses often get caught along with all other traffic on congested roads once they reach Cambridge. South Cambridgeshire District Council consulted on whether the reserve site at Northstowe should be allocated in the Local Plan but recognised that this would not increase the number of homes that could be built by 2031, but could provide flexibility in the way the town is built. It is not expected that the reserve land will increase the overall number of homes at Northstowe.

Development at larger villages

46. A total of 640 homes have been built in villages since 2011. There are outstanding commitments for 3,028 homes in the rural area as a whole as at end March 2012 and three site options that were subject to public consultation in the Issues and Options consultation of summer 2012 now have planning permission for a further 185 homes .

Total Existing Supply

47. Cambridge has an existing supply of 10,437, divided between the urban area, and sites on the fringe of the City.

CAMBRIDGE	Completions and Committed Dwellings (March 2013)	Percentage of existing total supply
Cambridge Urban Area	2,978	29
Cambridge Fringe Sites	7,459	71
TOTAL	10,437	

48. The total existing supply for South Cambridgeshire accounts for 14,029 dwellings.

SOUTH CAMBS	Completions and Committed Dwellings (March 2013)	Percentage of existing total supply
Cambridge Urban Area	309	2
Cambridge Fringe Sites	3,902	28
New Settlements	5,965	43
Villages	3,853	27
TOTAL	14,029	

49. The combined total of existing supply of the two districts is shown in the table below.

CAMBRIDGE AND SOUTH CAMBS	Completions and Committed Dwellings (March 2013)	Percentage of existing total supply
Cambridge Urban Area	3,287	13
Cambridge Fringe Sites	11,361	46
New Settlements	5,965	24
Villages	3,853	16
TOTAL	24,466	

50. The current commitments retain the Cambridge focus of the strategy originated in the Structure Plan, with around 60% in or on the edge of the City.
51. The objectively assessed housing needs identified in the Strategic Housing Market Assessment (SHMA), which the two Councils have committed to meeting

in full within their own areas under a country-wide Memorandum of Cooperation, are 14,000 homes for Cambridge and 19,000 homes for South Cambridgeshire for the plan period 2011-2031.

52. A housing requirement of 14,000 dwellings for Cambridge, means the new Local Plan needs to accommodate an additional 3,563 dwellings on top of current supply. A housing requirement of 19,000 for South Cambridgeshire, means the new Local Plan needs to identify sites to accommodate a further 4,971 dwellings.
53. Both individually and in combination, the new local plans of both districts will be determining the location of around 25% of the total development planned in the sub region 2011 to 2031. Whatever the outcome of the strategy a significant focus on Cambridge will remain.

Identifying New Site Options

54. Both Councils have explored a range of site options that could meet the additional development requirements to 2031 through their Issues and Options consultations.

Cambridge

55. Cambridge City Council has undertaken an extensive search for additional housing sites within the built-up area. This involved a Strategic Housing Land Availability Assessment (SHLAA) whereby the Council issued a general 'call for sites' to identify all possible sites that could accommodate housing development in the city as well as undertaking an extensive search for sites. Sites that were put forward were subject to a rigorous assessment leading to a shortlist of sites which could deliver an additional 2,060 homes. These sites were subject to public consultation in January 2013, including initial sustainability appraisal by Cambridge City Council.

On the edge of Cambridge (Cambridge and South Cambridgeshire)

56. The Green Belt surrounding Cambridge has been in place since the 1950s. Green Belt policy has maintained the setting and special character of Cambridge, avoided coalescence with the ring of villages closest to the city, protected the countryside from development and prevented urban sprawl. The result is that Cambridge remains a compact city, surrounded by attractive countryside and a ring of attractive villages to which there is easy access by foot and bicycle. The city centre is unusually close to open countryside, particularly to the west and south-west.
57. These characteristics are valued assets and significantly contribute to the character and attractiveness of the historic city and the wider Cambridge area, and the quality of life enjoyed here. The Green Belt around Cambridge has an inextricable relationship with the preservation of the character of the city, which

is derived from the interplay between the historic centre, the suburbs around it and the rural setting that encircles it.

58. The National Planning Policy Framework (NPPF) states that the Government attaches great importance to Green Belts, with the fundamental aim of Green Belt policy being to prevent urban sprawl by keeping land permanently open. The essential characteristics of Green Belts are their openness and their permanence. The NPPF continues the five long established national purposes of including land within Green Belts as being to:
- To check the unrestricted sprawl of large built-up areas;
 - To prevent neighbouring towns merging into one another;
 - To assist in safeguarding the countryside from encroachment;
 - To preserve the setting and special character of historic towns; and
 - To assist in urban regeneration, by encouraging the recycling of derelict and other urban land.
59. At the local level, the fourth bullet is of particular significance and the following purposes of the Cambridge Green Belt have been established in previous Local Plans:
- To preserve the unique character of Cambridge as a compact, dynamic city with a thriving historic centre;
 - To maintain and enhance the quality of its setting; and
 - To prevent communities in the environs of Cambridge from merging into one another and with the city.
60. Green Belt boundaries can only be established in Local Plans and according to the NPPF, once established they can only be altered in exceptional circumstances. The current inner Green Belt boundary has been established through the Cambridge Local Plan (2006) and South Cambridgeshire Local Development Framework (adopted between 2007 and 2010), including the Cambridge East Area Action Plan (2008) and North West Cambridge Area Action Plan (2009). The exceptional circumstances for establishing the Green Belt boundaries set out in existing plans came through the Cambridgeshire and Peterborough Structure Plan (2003), which sought to focus more growth close to Cambridge to increase the sustainability of development. The Structure Plan agreed broad locations where land should be released from the Green Belt.
61. In order to inform the current detailed Green Belt boundary, two important studies were undertaken. The first was the Inner Green Belt Boundary Study undertaken by Cambridge City Council in 2002 and the second was the Cambridge Green Belt Study by Landscape Design Associates for South Cambridgeshire District Council in September 2002.
62. The study for South Cambridgeshire District Council took a detailed look at the Green Belt around the east of Cambridge and a wider, more strategic look at the Green Belt elsewhere around the city, whilst the Inner Green Belt Boundary Study prepared by Cambridge City Council was carried out to specifically assist with identifying sites that could be released from the Green Belt for development

close to Cambridge without significant harm to the purposes of the Green Belt including the setting of the city.

63. The City Council also commissioned a specific Green Belt study by Landscape Design Associates (2003) in relation to land West of Trumpington Road. This was a requirement of the Structure Plan (2003). This study concluded that there was no case for a Green Belt release concerning the land West of Trumpington Road, in that the land provides a rural setting of arable farmland and water meadows close to the historic core, which is not found elsewhere around Cambridge. A smaller area of land including school playing fields and the golf course was assessed for development within this broad location and it was concluded that these were attractive features in their own right which contribute positively to the quality of the landscape setting of Cambridge, and the quality of life for people within the city.
64. The current Green Belt boundary around the city was established with the expectation that its boundaries could endure to the end of the plan period of 2016 and beyond. However, circumstances have changed, and whilst good progress has been made towards achieving the current development strategy, with development of the fringes all underway with the exception of the Cambridge East airport site, the Councils do need to consider as part of preparing their new Local Plans whether there are exceptional circumstances for reviewing Green Belt boundaries again. In reviewing Green Belt boundaries, the NPPF requires local planning authorities to take account of the need to promote sustainable patterns of development, and with consideration given to the consequences for sustainable development of channelling development outwards urban areas inside the Green Belt boundary, towards towns and villages inset within the Green Belt or towards locations beyond the outer Green Belt boundary.
65. The Councils took a joined up approach in the Issues and Options consultations in Summer 2012 and asked whether there should be more development on the edge of Cambridge, if there should be more land released from the Green Belt, and if so, where should this be. Ten Broad Locations around the edge of Cambridge were consulted on to explore whether any had potential to be released from the Green Belt for housing. A summary of the views received is contained in the Site Assessments for Edge of Cambridge Sites evidence document. The ten broad locations were also subject to sustainability appraisal in the Initial Sustainability Appraisal. Promoters of land on the edge of Cambridge through the Councils' respective SHLAA processes resubmitted their sites through the consultations.
66. To help inform the process in moving forward to identifying specific site options, the Councils carried out a joint review of the Inner Green Belt boundary. The purpose of the review was to provide an up to date evidence base for Councils' new Local Plans, and help the Councils reach a view on whether there are specific areas of land that could be considered for release from the Green Belt and allocated for development to meet their identified needs without significant harm to Green Belt purposes.

67. The Inner Green Belt Study Review 2012 builds on the studies that were undertaken in 2002 and 2003 as well as the broad updated appraisal of the Inner Green Belt boundary that the City Council undertook in March 2012 to sit alongside its Issues and Options consultation (Summer 2012). The appraisal of the inner Green Belt boundary areas was undertaken against the backdrop of the most recent land releases and how those releases have affected the revised inner Green Belt boundary. The appraisal specifically reconsidered zones of land immediately adjacent to the city in terms of the principles and function of the Green Belt.
68. In summary, both steps have found that releases of land on the edge of the city through the current Local Plans are sound. However, as a consequence of the releases, the adjacent rural land surrounding these sites now has increased value for Green Belt purposes and to the setting of the city. This increase in value for Green Belt purposes comes from three considerations:
- New developed edges are being created on land released from the Green Belt by previous plans and these edges are moving the city further into its rural surroundings and therefore lessening the extent of the Green Belt;
 - The new edges are different from those previously seen on the edge of the city being more densely developed and usually higher and not so easily softened by vegetation; and
 - Views of the city will be foreshortened as the edge advances into the rural surroundings sometimes making the foreground noticeably more important for the setting of the city.
69. The work concluded that areas where the city is viewed from higher ground or generally has open aspects, or where the urban edge is close to the city centre are more sensitive and cannot accommodate change¹ easily. Areas of the city that have level views and where the edge has mixed foreground can sometimes accommodate change more easily. On a comparative basis these areas have a lesser importance to the setting of the city and to the purposes of Green Belt.
70. Given that the inner Green Belt boundary was looked at very closely only a decade ago it should not be unexpected that the new review has found that most of the inner Green Belt continues to be important for Green Belt purposes and specifically important to protect the setting and special character of Cambridge as a historic city.
71. The work also confirmed that in areas where changes to the city edge are currently envisaged and they are adjacent to important view-points such as motorways or elevated vantage points, there needs to be an appropriately sized area of land retained as Green Belt between any future urban edge and the view/vantage point to still provide a green foreground setting to the city. This green foreground should be retained as Green Belt. This need is vital because development requires a minimum distance between it and the viewpoint to avoid

¹ 'Change' means the introduction of a different feature into the rural/agricultural landscape. This could be an electricity pylon, built development or even a bio-mass crop, but in this instance it is built development.

a harmful effect on the setting of the city. This can be demonstrated on the northern edge of the city where development in places now abuts the A14 with no foreground between the viewpoint and the development. As a result, the development cannot be viewed in any sort of landscape context or setting making it appear severe and discordant.

72. Having thoroughly tested the inner Green Belt boundary, the Inner Green Belt Study Review 2012 found that there are a limited number of small sites, which are of lesser importance to Green Belt purposes. The review also concluded that the significant majority of the remaining Green Belt close to Cambridge is fundamentally important to the purpose of the Cambridge Green Belt and should not be developed. This is considered to be the tipping point, at which if you extend beyond this point for development, the Green Belt purposes and setting of the city are compromised. Any further significant development on the inner edge of the Green Belt would have significant implications for Green Belt purposes and fundamentally change Cambridge as a place. The 2012 study confirmed the conclusions of the Green Belt Study 2002 by Landscape Design Associates, that despite extensive development to the south-east, east and north of the historic core, the scale of the core relative to the whole is such that Cambridge still retains the character of a city focussed on its historic core. The findings of the study were incorporated into the technical assessments of potential site options.

Identifying site options on the Edge of Cambridge

73. Following the identification and testing of broad locations in the 2012 Issues and Options consultation, a long list of sites at the fringe of Cambridge was developed within these broad locations drawing on two sources: Developers' site boundaries received from the 'call for sites' for the Strategic Housing Land Availability Assessments (SHLAAs) carried out by both authorities and also pursued through the 2012 Issues and Options consultations; and additional sites identified through the 2012 Inner Green Belt Review as fulfilling Green Belt purposes to a lesser degree. This resulted in an initial list of 41 sites.
74. These sites were assessed utilising a site assessment pro forma, which was developed jointly to take into account both authorities' Sustainability Appraisal objectives. The pro forma was specifically developed to fully integrate the sustainability appraisal process into site assessment. The criteria in the pro forma take into account the social, environmental and economic sustainability themes and objectives identified in the Sustainability Appraisal Scoping Reports of both Councils. Ensuring that the criteria take into account the SA is the most effective way of ensuring that the SA is central to the appraisal of sites. In this way, the potential effects of bringing forward alternative sites for development can be thoroughly tested and compared. Consultants URS, who are carrying out the Sustainability Appraisal (SA) of the Cambridge Local Plan review, advised on the development of the joint pro forma to ensure that it meets the requirements of SA and the Strategic Environmental Assessment (SEA) Directive. The pro forma also includes planning and deliverability criteria which

do not directly relate to the SA, but are important in order to ensure that the Local Plans are deliverable.

75. The Joint Green Belt Site Assessment Pro forma can be found at Appendix 1 of the Interim Sustainability Appraisal of Issues and Options 2 Part 1. For each criterion there is an explanation as to which of the Cambridge SA topics and South Cambridgeshire SA objectives it relates to. A traffic light system has been used to score the sites from 'red red' (a significant negative impact) to 'green green' (no impact or minor impact which can be mitigated). In most cases there were three potential scores (red, amber, green), but in some cases this was extended at either end to five categories to give a finer grained assessment. The grading range provides a means by which the relative sustainability of each site can be established in comparison with other sites.
76. The pro forma is split into two parts. The first part is a high level sieve (Level 1). It includes strategic considerations, including impact on the Green Belt, flood risk, national biodiversity and heritage designations. It also addresses key deliverability issues. This stage is effective for identifying issues that mean a site should be rejected.
77. Level 2 of the assessment considered a range of issues including accessibility to services and sustainable transport, pollution, historic environment and biodiversity. Although a number of sites were considered to merit rejection following the Level 1 assessment, they were also assessed by the Level 2 criteria in order to give the most comprehensive and robust assessment possible.
78. Map 2 and Appendix 1 in the Issues & Options 2, Part 1 – Joint Consultation of Development Strategy & Site Options on the Edge of Cambridge (November 2012) illustrate the site options tested. The completed pro formas for all of the sites assessed can be found in the 'Technical Background Document – Part 1' at the following link: www.cambridge.gov.uk/ccm/navigation/planning-and-buildingcontrol/planning-policy/background-documents/
79. The individual site pro formas show how each site performs against the criteria that relate to the sustainability objectives.
80. In order to draw information together in an accessible form, and reach an overall conclusion on the merits of the sites assessed, key elements from the pro formas were combined in a series of summaries by broad location which enable the most and least sustainable sites to be identified. These can be found in Appendix 2 of the Issues and Options 2 (2013) Part 1 document.
81. Following the assessment, 6 sites in the Green Belt on the edge of Cambridge were identified as being sites with development potential, albeit with some constraints or adverse impacts (with an overall score of amber). These include two housing sites, two employment sites, one site which could be developed for either housing or employment and one which could be potentially developed for housing, employment or a community stadium. Five of these sites are located

to the south of Cambridge and one is to the north of Cambridge. Four of the sites are within the Cambridge City Council boundary and two fall within South Cambridgeshire. These were subject to public consultation in the joint Issues and Options 2: Part 1 consultation in January 2013.

82. The other sites assessed have been rejected as options for development, due to either their significance to Green Belt purposes and/or for other reasons including planning constraints such as archaeological merit. Reasons for rejection are summarised in Appendix 3 of the Issues and Options 2: Part 1 document.

Identifying Site Options – The Rest of South Cambridgeshire

83. In order to identify reasonable site options, South Cambridgeshire District Council has drawn on its Strategic Housing Land Availability Assessment (SHLAA). The National Planning Policy Framework (NPPF) (March 2012) requires the preparation of Strategic Housing Land Availability Assessments (SHLAA), by local planning authorities, to establish realistic assumptions about the availability, suitability, and likely economic viability of land to meet the identified need for housing over the plan period. A 'Call for Sites' was issued in 2011, and nearly 300 site options with development potential were submitted and subject to testing.
84. Each of the sites was also subject to Sustainability Appraisal. This tested the impact of development on the 23 South Cambridgeshire Sustainability Objectives, identified through the sustainability appraisal scoping process. To assist in making this assessment quantifiable, measurable and transparent, and for direct comparison between sites to be made, the Site Assessment Matrix in appendix 2 of the Initial Sustainability Appraisal indicates how the impact of individual sites against each objective has been determined. For a number of objectives, quantifiable grading was identified to provide a means by which the relative sustainability of each site can be established in comparison with other sites.
85. In order to combine the results of the SHLAA and SA to assist plan making, a summary assessment that draws together the two assessments and reaches a view on the 'Sustainable Development Potential' of each site was prepared. Appendix 6 of the SHLAA document includes detailed assessments of all sites and can be viewed on South Cambridgeshire District Council's website: www.scambs.gov.uk/ldf/shlaa .
86. Annex 1 of the Initial Sustainability Appraisal Report 2012 includes detailed sustainability appraisals of all sites, and Annex 2 the summary assessment for each site.
87. The South Cambridgeshire SHLAA and Sustainability Assessments identify key constraints and considerations relating to potential development sites including suitability, availability and achievability. In order to draw information together in

an accessible form, and reach an overall conclusion on the merits of the sites assessed, key elements from both assessments were combined in a series of settlement summaries which enable the most and least sustainable sites in each settlement to be identified. This was collated in Annex 2 of the Initial Sustainability Appraisal Report 2012. These assessments explore issues in two groups, providing an assessment of the impact and its significance, using a similar mechanism to the SA of identifying a range from significant positive to significant negative impacts. The first group of issues comprises:

- Strategic considerations identified in the SHLAA – Identifies if a site is subject to any strategic considerations that have the potential to make the site unsuitable for development e.g. flood risk, impact on SSSI or Listed Buildings (reflects tier 1 of the SHLAA site assessment. Green Belt impact was drawn out separately).
- Green Belt – Sites in the Green Belt are identified by a negative score, sites outside as neutral. If it is in the Green Belt, impact on the function of the Green Belt was considered, and the scale of impact identified. The assessment included in the SHLAA utilised the LDA Green Belt Study 2002 to guide consideration. Green Belt as a matter of principle was NOT used as an exclusionary factor at this stage.
- SHLAA significant local considerations – Identifies if a site is subject to heritage, environmental and physical considerations, from tier 2 of the SHLAA Assessment (note landscape and townscape impact drawn out separately)
- Landscape and townscape impact – reflects the conclusions of the SHLAA and the Sustainability Appraisal.
- SHLAA site specific factors – Considers the availability and achievability of the site. If a site is scored as a significant negative, it is rejected, as it cannot be delivered.(Reflects tier 3 of the SHLAA assessment).
- Access to key local services, distance to key local services, accessibility by sustainable transport modes – draws on the Sustainability Appraisal to consider transport accessibility.

88. Each summary concludes with the ‘Sustainable Development Potential’. This draws on the SHLAA Assessment and the Sustainability Appraisal. It categorises sites as follows:

- More Sustainable Sites with Development Potential (few constraints or adverse impacts) GREEN
- Less sustainable but with development potential (some constraints or adverse impacts) AMBER

- Least Sustainable, with no significant development potential (significant constraints or adverse impacts) RED
89. The entries in the summary assessment sometimes represent a judgement about a number of separate criteria from the SHLAA and Sustainability Appraisal assessments and represent a balanced view of the overall performance of that site across a range of criteria.
 90. The settlement summaries taken together with the full assessments allow for sites to be selected to meet a number of different options relating to the scale of growth and spatial development strategies. They have also helped to make the process and findings accessible for the public during the Issues and Options consultations.
 91. Sites identified as 'Least Sustainable, with no significant development potential' have been rejected at this stage, because they are not considered reasonable options for development.
 92. The approach to village sites has taken into account the village hierarchy, developed following a review of the sustainability of settlements (South Cambridgeshire Village Classification Report 2012), and included in the Spatial Strategy chapter of the Local Plan. This identifies Rural Centres as the most sustainable villages in the district, with the highest level of access to a combination of services, facilities, employment and public transport, providing services to a small rural hinterland. Minor Rural Centres are the next in the hierarchy, offering a lower level of services and facilities, but still more than smaller villages. Sites that were consulted on as potentially falling in a new category 'Better Served Group Villages' provide a lower level of services and facilities, but could be differentiated from Group villages, which only benefit from a low level of services but include a primary school. At the bottom of the hierarchy, infill villages do not have a primary school, and are generally the smallest villages in the District.
 93. After reviewing the potential development sites, it was clear that sufficient sites could be identified as higher levels of the hierarchy, without relying on allocations in the smallest villages, which would lead to a dispersed pattern of development where the fewest services and facilities are available. Therefore sites at Group and Infill villages were not considered reasonable alternatives and were not consulted on, even if they scored Amber in the assessments. Such sites may be capable of development as windfalls or as rural affordable housing exception sites depending on their location and scale, but they would not reflect a sustainable form of development in the context of a district wide strategy and so have not been considered as options for development site allocations in the Local Plan.

New settlements

94. A total of 14 sites which would either deliver new standalone settlements, or expand existing new settlements, were tested through the SHLAA and Sustainability Appraisal process.
95. Five options were subsequently identified for consultation in Issues and Options 2012. The Strategic Reserve at Northstowe, identified in the current Local Development Framework, was identified, but is unlikely to deliver additional dwellings at Northstowe during the plan period and may simply help provide the planned 9,500 homes in a high quality form of development. Potential new settlements were identified at Waterbeach Barracks, with three different scale options identified. A new village at Bourn Airfield was also identified as an option.
96. New settlement options could deliver significant numbers of new homes but they have major infrastructure requirements, particularly in terms of transport measures.. High quality, sustainable transport solutions would be essential to minimise commuting by private car.
97. New settlements also require long lead in times before they can deliver homes on the ground and therefore could only provide homes for the second half of the plan period, although they would continue to provide housing beyond the plan period. A new town at Waterbeach Barracks may only deliver 1,400 dwellings during the plan period. A new village at Bourn Airfield may have greater potential to deliver in the plan period if appropriate.

Larger, better served villages

98. South Cambridgeshire District Council consulted in Issues and Options 2012 on site options that could deliver a total of 5,850 new homes on village sites. This included a strategic scale development at Cambourne.
99. In response to Issues and Options 2012 consultation, 58 new sites were submitted to the Council for consideration. Those in Group and Infill villages were not assessed, because they are the villages with limited services and facilities and the least sustainable locations for development. The 30 sites in identified Better Served Group Villages and above were assessed and 10 additional site options were identified for consultation in the I&O2. These sites could deliver an additional 1,245 new homes. This gives options for a total of 7,095 additional new homes at this lowest stage in the development sequence.

Public Consultation

100. Site options were subject to public consultation through the Issues and Options Consultations, including the joint consultation in January 2013.

101. Over 38,000 representations have been submitted to the councils in response to the two issues and options consultations that have taken place so far. Summaries of the representations, as well as the individual representations, are available to view on the Councils' websites.
102. The Councils have reviewed and considered the comments received, including Member Workshops for South Cambridgeshire Members and the Development Plan Scrutiny Sub-Committee for Cambridge City Council Members. The Councils have also considered a range of possible options that flow from the development strategy options and the site options consulted on and tested those through the SA process. They have also been tested through transport modelling and as the long list of site options has been narrowed down, key stakeholders have been asked again for their views on the emerging shortlist of sites to help further refine the preferred strategy and package of sites, such as the education authority.
103. As referred to earlier, the SA of the broad strategy options at Appendix 1 demonstrates that focusing development on Cambridge remains the most sustainable location for additional development and the Cambridge SHLAA has identified 6,302 new homes through windfall sites or allocations within the urban area in the new Local Plan.
104. The edge of Cambridge is the next most sustainable location against a range of objectives for growth in the development sequence, but the SA identifies the importance of balancing the accessibility aspects of sustainable development and the environmental and social benefits it brings, with the significant harm to the landscape and setting environmental aspects of sustainability that development on land in the Green Belt would have, with the resulting irreversible adverse impacts on the special character and setting of Cambridge as a compact historic city and the risks that could have to the economic success of the Cambridge area, which is in part built on its attractiveness as a place to live and work. The detrimental impacts of further major development on the edge of Cambridge was demonstrated in the Inner Green Belt Study Review 2012 and major extensions to Cambridge were rejected as reasonable options and not consulted on in Issues and Options 2 in 2013. The assessment process identified six Green Belt sites as potential options for development and this limited refinement of the Green Belt would mean that Cambridge is able to meet its full objectively assessed needs within its administrative area. Results of consultation on the appropriate balance between edge of Cambridge or new settlements and better served villages was strongest to protect the Green Belt.
105. The effect of decisions on reasonable site options on the edge of Cambridge is to require development away from Cambridge to meet the remaining development needs of the wider Cambridge area. The SA of broad locations at Appendix 1 confirms earlier findings from the Regional Spatial Strategy review and Structure Plan that new settlements are the next most sustainable location for growth and that development at villages should be limited for sustainability reasons.

106. South Cambridgeshire's SHLAA and Initial Sustainability Report demonstrate that there are 2 new settlement options that can be considered for development in the new Local Plan: a new town at Waterbeach and a new village at Bourn Airfield. The other new settlement options put to the Council were rejected in the SHLAA and initial SA process. The 2 sites identified scored as Amber in the assessment largely because it is inevitable that such a major development will have some adverse impact on some aspects of sustainability, but it was considered that they would be capable of mitigation through carefully designed development proposals. The results of consultation supported concentration on new settlements rather than focus on edge of Cambridge due to Green Belt impacts
107. At the more sustainable village stage of the sequence, South Cambridgeshire consulted on a range of housing site options across the district. The largest of these was a major extension to Cambourne, through a fourth linked village to the west of the existing village. The results of consultation offered some support to better served villages, although to a lesser extent than new settlements.

Consideration of alternative packages of sites

108. The Councils have followed an iterative process of developing the preferred strategy.
109. For Cambridge, the level of objectively assessed need is such that all reasonable options have needed to be included in the Local Plan and Cambridge City Council does not consider that any reasonable alternatives exist for meeting need beyond this, in view of the outcome of work to consider potential for Green Belt review.
110. For South Cambridgeshire, having jointly reached the view on the edge of Cambridge, the options available are around the number of new settlements identified in the new Local Plan, the possible timing and level of delivery that could be secured in the plan period from those sites, whether to include a major expansion of the previously established new village of Cambourne, and the implications for level of village provision that would need to be made and identifying the best available sites in the better served villages.
111. Important issues for shortlisting the preferred village sites included:
- providing homes close to the jobs in and around Cambridge,
 - providing homes close to the jobs south of Cambridge in view of the predominance of new housing in villages to the north over many years and substantial jobs growth in the south,
 - focus on more sustainable villages with high quality public transport links to Cambridge
 - making best use of brownfield land
 - Avoid green spaces, and areas of flood risk
 - sites with parish council and local support

112. A range of options around the new settlement options, major expansion of Cambourne and the best available sites at villages have been identified and tested through SA, to consider the relative impact of different development packages. This included looking at different levels of growth at some of the site options to minimise adverse impacts and secure the most sustainable form of development. Details are included in appendix 2 of this report.

The Revised Strategy

113. The Councils are now at the stage of identifying the preferred package of housing sites to include in their Local Plans to meet their identified objectively assessed needs. Given the significant level of supply from each Council's current plans of 10,400 for Cambridge and 14,000 for South Cambridgeshire, the Councils need to allocate land for a further 3,600 and 5,000 homes respectively.
114. Cambridge City Council has identified sites for 3,324 new homes through new allocations and windfall development in the urban area of Cambridge. In addition, land north and south of Worts Causeway is proposed to be removed from the Green Belt and allocated for housing to deliver 430 dwellings. This would enable the City Council to meet its full identified housing needs within its administrative area.
115. It is also proposed to allocate the 3 sites on Fulbourn Road close to ARM for employment, 2 in Cambridge City Council's area and 1 in South Cambridgeshire.
116. A small expansion of the existing NIAB2 housing site in South Cambridgeshire between Huntingdon and Histon roads is also proposed, although this would not increase the overall number of homes currently planned but instead provide more room to ensure a high quality development. It is not proposed to include employment on the site so that there is sufficient room for the supporting infrastructure necessary for the housing development to retain a green foreground to Cambridge Road.
117. Strategic options for new development in South Cambridgeshire focus on new settlements and previously established new settlements, with new allocations for:
- New town at Waterbeach Barracks – 8,000 homes, 1,400 of which by 2031.
 - New village at Bourn Airfield – 3,500 homes, 1,470 of which by 2031.
 - Cambourne West – 1,500 homes, all by 2031.
118. The preference to allocate all three strategic sites has been influenced by the long lead in times for new settlements which will therefore come forward later in the plan period and continue developing beyond 2031. Without also including major expansion of Cambourne, a significant amount of development would be required at villages and would result in the sort of dispersed development strategy previously having been found to be unsustainable. Bourn Airfield new

village would be delayed by two years to come forward slightly later in the plan period than it otherwise might, so that the remainder of Cambourne is well progressed before any development starts at Bourn Airfield. This will also help provide additional flexibility. The strategic sites will provide 4,370 homes in the plan period. Starting Waterbeach towards the end of the plan period has the benefit of ensuring that Northstowe will be well established before another new town development begins.

119. The major sites will be supported by limited development at the more sustainable villages in the order of 900 homes to provide flexibility and help ensure a continuous supply of housing land over the plan period, including if there is any delay in progress on any of the major sites.

(Note: the preferred village sites will be considered at South Cambridgeshire's Planning Policy and Localism Portfolio Holder's meeting on 11 June)

120. The table below shows the level of development proposed at each stage of the development sequence:

CAMBRIDGE AND SOUTH CAMBRIDGESHIRE HOUSING 2011 TO 2031	Existing Completions and Commitments (both areas)	New Sites Cambridge	New Sites South Cambs	TOTAL	Percentage
Cambridge Urban Area	3,287	3,324	0	6,611	20
Edge of Cambridge	11,361	430	100	11,891	35
New Settlements	5,965	0	4,370	10,335	31
Villages	3,853	0	895	4,748	14
TOTAL	24,466	3,754	5,365	33,585	100

121. The development strategy identified includes development at a number of levels in the sequence taking account of the opportunities and constraints identified.
122. Cambridge remains the focus of the development strategy comprising 55% of the housing requirement 2011 to 2031. This is comparable with and slightly higher than the 52% in the Structure Plan strategy.
123. Only minor additional Green Belt development potential was identified on the edge of Cambridge in addition to the extensive existing commitments because of the significant harm this would cause to the purposes of the Green Belt. The additional dwellings, added to those already committed, mean that 35% of all new development is planned on the edge of Cambridge, compared with 25% in the Structure Plan.
124. In addition to the new settlement at Northstowe, the strategy proposes additional new settlements at Bourn Airfield, and in the longer term Waterbeach Barracks. This will enable infrastructure investment to be focused to maximise benefits, maximise travel by non-car modes, support the re-use of significant previously

developed sites, and reduce the need for further development at villages as the final and least sustainable stage in the development sequence, although some village development is proposed to provide flexibility.

125. At the village level, development will be focused on the more sustainable villages with the best range of services and facilities, including taking account of opportunities to utilise previously developed land.

126. A comparison with the Structure Plan 2003 strategy is provided below.

	Structure Plan 1999 to 2016	Percentage	New Strategy 2011 - 2031	Percentage
Edge of Cambridge	8,000	25	11,891	35
New Settlements	6,000	18	10,335	31
Villages	9,600	30	4,748	14

APPENDIX 1

The sustainability implications of focusing development at different spatial locations

The following builds on the assessment of South Cambridgeshire Issues and Options 2012 Issue 9: Development Strategy, which considered the broad implications of focusing development at different locations in the development sequence. It additionally includes a comparison with development within the Cambridge urban area to cover the whole of the development sequence. It has also been reviewed by Environ, who are completed the Final Sustainability Appraisal of the South Cambridgeshire Local Plan.

The appraisal is structured around the South Cambridgeshire sustainability objectives, established through the South Cambridgeshire Sustainability Appraisal Scoping Report. The linkages to the Cambridge City Sustainability Appraisal Framework and its Objectives have been considered, and the relationship between the sustainability objectives is detailed at the end of this note.

	1. Land	2. Waste	3. Air quality and environmental pollution	4. Designated sites and protected species	5. Habitats and species	6. Access to wildlife and green spaces	7. Landscape and townscape character	8. Historic Environment	9. Good Spaces	10. Climate Change Mitigation	11. Climate Change Adaptation	12. Human health	13. Crime	14. Public Openspace	15. Housing	16. Inequalities	17. Services and Facilities	18. Involvement	19. Economy	20. Access to Work	21. Infrastructure	22. Sustainable Travel	23. Transport infrastructure
Cambridge Urban Area	+++	~	?	~	?	~	+	~	~	~	~	?	~	~	~	~	+++	~	~	+++	+++	+++	+++
Edge of Cambridge	-	~	?	?	?	+++	--	-	~	~	~	?	~	~	~	~	+ / +++	~	~	+++	+++	+++	+++
New settlements	+	~	~	?	?	+++	-- / ?	~	~	+++ / ?	~	~	~	~	~	~	+ / +++	~	~	+++ / ?	+++	+ / ++	+++
More sustainable villages	-	~	~	?	?	+	- / ?	~	~	~	-	~	~	~	~	~	+	~	~	+	+	-	-
Smaller less sustainable villages	-	~	~	?	?	+	- / ?	~	~	~	~	~	~	~	~	~	--	~	~	--	-	--	--

ASSESSMENT KEY

Symbol	Likely effect against the SA Objective
+++	Potentially significant beneficial impact, option supports the objective
+	Option supports this objective although it may have only a minor beneficial impact
~	Option has no impact or effect is neutral insofar as the benefits and drawbacks appear equal and neither is considered significant
?	Uncertain or insufficient information on which to determine the assessment at this stage
-	Option appears to conflict with the objective and may result in adverse impacts
---	Potentially significant adverse impact, conflict with the objective

This assessment considers the range of broad strategies / options available for growth. This is a high level appraisal of strategic options and actual impacts on many objectives would depend on the specific site options identified for development, and therefore these are more appropriately explored elsewhere.

Cambridge

Development in Cambridge offers opportunities to re-use previously developed land, making use of the existing urban area, reducing the need to develop greenfield / agricultural land. Cambridge provides the highest concentration of jobs, and high order services and facilities in the Cambridge area, placing residential development in the urban area would enable the closest access to these. With regard to air quality, the central area of the city is identified as an AQMA, and therefore further development could include placing further population in this area. However, development in the urban area has best opportunity to support non-car modes of transport, and the compact nature of the city makes it particularly suitable for cycling in addition to walking.

Edge of Cambridge

An edge of Cambridge focus would involve Green Belt development, and loss of significant amounts of high grade agricultural land. The review of the Green Belt identified that it would not be possible to deliver significant additional development on the edge of Cambridge without significant detriment to the specific purposes of the Cambridge Green Belt. These purposes highlight the importance to the historic City of Cambridge of the quality of its setting as well as the usual role of Green Belts in preventing communities from merging with one another. The recent review of the Green Belt released large areas of less significance to Green Belt purposes, and the land that remains on the inner edge becomes increasingly important.

Development on the edge of Cambridge would be the next closest development option to the urban area of the city, supporting access opportunities by alternative modes, although access to public transport services is better close to radial routes with good services, and some areas around the City currently have more limited access to high quality public transport. Larger developments could include their own local centres, and be accessed by new public transport routes.

Development on the edge of Cambridge could bring dwellings closer to the M11 or A14, areas of relatively poor air quality (with an AQMA on the A14). Major development has the potential to worsen air quality, although it would support greater use of non-car modes than more distributed patterns of development. Development near to busy routes would still add to congestion at peak times.

Green Infrastructure opportunities would vary by site, but larger scale development could support delivery of significant green infrastructure. A number of larger site proposals specifically reference the potential to deliver significant open space or Green Infrastructure beyond the minimum required by policy.

New Settlements

A focus on new settlements could utilise previously developed land opportunities, such as former airfields or military barracks, although they would also be likely to still utilise significant areas of greenfield land. New settlements could incorporate significant public transport routes to Cambridge, and new town and local centres as appropriate, to ensure that residents have convenient access to local services and facilities by walking, cycling and public transport. They have the potential to enable focussed investment in public transport and cycling infrastructure, delivering high quality services to provide a significantly higher modal share of travel by non-car modes than village based growth options. The greater distance from Cambridge would mean higher levels of car use (although significantly better than dispersed villages based strategies), and it would result in focused pressure on specific routes. This could have local air quality implications.

New settlements could be developed with a mix of uses with employment delivering jobs locally and their own services and facilities of higher order than smaller scale growth at existing villages. This could provide a degree of self-containment, by providing opportunities to live and work in the same place, however, the greatest concentration of jobs will remain in and close to Cambridge.

The scale and mixed use nature of new settlements offer specific opportunities for renewable energy based upon potential for combined heat and power.

Impact on landscape would depend on the site, but the scale of a new settlement means that impacts could be significant. Some sites were tested with more limited wider landscape impacts. Located outside the green belt they would have a lesser impact on townscape, and the setting of Cambridge. Sites tested were all outside the Green Belt. New settlements could provide opportunity to deliver significant green infrastructure.

More Sustainable Villages

A focus on the more sustainable villages would focus development on villages where there is the best access to local services and facilities and best public transport to access higher order services and facilities in Cambridge, but comparatively villages offer a reduced range of opportunities, and the need to travel would be greater than in other options.

There are likely to be significantly less opportunities to deliver sustainable transport than a Cambridge focused or new settlement option, as spreading development around villages would be likely to deliver incremental improvements at best, rather than focused investment. Traffic impacts would be spread more around the district, but there would be a higher modal share for car use. Outside the Rural Centres public transport services are generally limited in terms of frequency and journey time. Cycling opportunities would also be lower than other strategy approaches, as distances to Cambridge or market towns would be greater, and would often rely on rural roads rather than dedicated routes.

A distribution to smaller sites would have a more incremental impact on the landscape and townscape, but village expansions could negatively impact on village character. The most sustainable villages are inset into the Green Belt close to Cambridge. A village based option would require incremental improvement to village infrastructure. This could put pressure on existing village services and facilities, such as schools, doctors and utilities. A more distributed pattern of village development would provide no direct opportunities to deliver significant scale green infrastructure. In order to identify the quantity of sites required to deliver required levels of development through a village focus, it could require the use of some sites in flood zone 2.

Other Villages

Focusing more development into less sustainable villages (group and infill villages) would have significant adverse impacts on access to services and facilities, employment, and sustainable transport. A village based strategy requiring development at lower levels of the village hierarchy would increase the proportion of growth at greater distances from major employment areas than other strategic approaches. In many cases public transport in smaller villages is extremely limited, and most lack any significant services and facilities, therefore increasing the journey length to access these.

Key to Sustainability Objectives

Further information on the objectives can be found in the individual districts sustainability appraisal scoping reports.

South Cambridgeshire Sustainability Objectives		Cambridge City Sustainability Objectives
LAND	1. Minimise the irreversible loss of undeveloped land, economic mineral reserves, productive agricultural holdings, and the degradation / loss of soils	1. Communities and Wellbeing
	2. Minimise waste production and support the reuse and recycling of waste products	
POLLUTION	3. Improve air quality and minimise or mitigate against sources of environmental pollution	4. Water 1. Communities and Wellbeing
BIODIVERSITY	4. Avoid damage to designated sites and protected species	8. Biodiversity and Green Infrastructure
	5. Maintain and enhance the range and viability of characteristic habitats and species	
	6. Improve opportunities for people to access and appreciate wildlife and green spaces	
LANDSCAPE, TOWNSCAPE AND CULTURAL HERITAGE	7. Maintain and enhance the diversity and local distinctiveness of landscape and townscape character	7. Landscape, Townscape and Cultural Heritage
	8. Avoid damage to areas and sites designated for their historic interest, and protect their settings.	
	9. Create places, spaces and buildings that work well, wear well and look good	
CLIMATE CHANGE	10. Minimise impacts on climate change (including greenhouse gas emissions)	6. Climate change mitigation and renewable energy
	11. Reduce vulnerability to future climate change effects	5. Flood risk including climate change adaptation

HEALTH	12. Maintain and enhance human health	1. Communities and Wellbeing
	13. Reduce and prevent crime and reduce fear of crime	
	14. Improve the quantity and quality of publically accessible open space.	
HOUSING	15. Ensure everyone has access to decent, appropriate and affordable housing	
INCLUSIVE COMMUNITIES	16. Redress inequalities related to age, disability, gender, race, faith, location and income	
	17. Improve the quality, range and accessibility of services and facilities (e.g. health, transport, education, training, leisure opportunities)	
	18. Encourage and enable the active involvement of local people in community activities	
ECONOMIC ACTIVITY	19. Improve the efficiency, competitiveness, vitality and adaptability of the local economy.	2. Economy
	20. Help people gain access to satisfying work appropriate to their skills, potential and place of residence	
	21. Support appropriate investment in people, places, communications and other infrastructure	
TRANSPORT	22. Reduce the need to travel and promote more sustainable transport choices.	3. Transport.
	23. Secure appropriate investment and development in transport infrastructure, and ensure the safety of the transport network.	

Appendix 2 Site Package Options for Sustainability Appraisal

In order to compare the sustainability of delivering the remaining housing needs for South Cambridgeshire at different locations, packages of sites have been identified and tested, to compare the cumulative impacts.

Eight different packages were identified, each with a different focus for the remaining development. It would not be reasonable to test every potential combination of options, but the aim has been to providing a good coverage of strategic alternatives that could be delivered with the site options available taking account of the issue and options and initial sustainability appraisal process.

Where new settlements have been considered, the deliverability and potentially longer lead in times have been taken into account. The phasing relative to other options has also been considered, in order to achieve the development needed in the plan period. In some cases different amounts of a site being developed in the plan period have been considered, with the remainder being developed later.

Further details of this assessment will be included in the South Cambridgeshire Final Sustainability Report, which will accompany the draft Local Plan.

Option 1 - Waterbeach New Town, Cambourne West and Village Focus

This option includes provision from the partial completion by 2031 of a new town at Waterbeach, with the remainder after 2031, the completion of an extension to the existing new settlement at Cambourne and development at a range of villages down to the 'Better Served Group Village' level.

Option 2 - Bourn Airfield New Settlement and Village Focus

This option includes the completion of a new settlement at Bourn Airfield within the plan period, and limited development in Rural Centres and Minor Rural Centre villages to meet the remaining requirement.

Option 3 - Cambourne and Village Focus

This option is a village focused approach. It includes completion of an extension to the existing new settlement at Cambourne, with the remainder of new development focused on other villages. At Waterbeach, there would be no new settlement, but the redevelopment of the barracks themselves would accommodate around 900 dwellings.

Option 4 - Waterbeach New Town, Bourn Airfield New Settlement, and Cambourne West Focus

This option includes provision from the partial completion by 2031 of a new town at Waterbeach, the partial completion of a new settlement at Bourn Airfield, the completion of an extension to the existing new settlement at Cambourne. This would be supported by selected development at Rural Centres and Minor Rural Centres.

Option 5 - Waterbeach New Town, Bourn Airfield New Settlement and Village Focus

This option includes provision from the partial completion by 2031 of a new town at Waterbeach, the partial completion of a new settlement at Bourn Airfield (but more than Option 4 assumes), and development at Rural Centres and Minor Rural Centres.

Comparing with Green Belt strategies

As detailed earlier, the assessment of 41 individual potential site options highlighted the potential harm to the Green Belt and the setting of the City of significant further development. Only 6 site options were identified, and all have been included within the proposed development strategy.

The sustainability appraisal earlier identified potential benefits on some sustainability objectives of further development in the Green Belt. In order to provide a comparison with other strategies, packages have been tested which include further development in the Green Belt, building on the assessments of tested but rejected sites. Testing has considered the overall impact of identifying the quantum of development in the broad locations available, rather than identifying specific rejected site options.

Option 6 - Cambridge Green Belt and Village Focus

This option assumes 2 or 3 large urban extensions to Cambridge on land currently in the Green Belt. This would accommodate around 4000 dwellings. This would be supported by selected village sites at Rural Centres and Minor Rural Centres, with a focus on previously developed land.

Option 7 - Cambridge Green Belt, Waterbeach New Town, Cambourne West and Village Focus

This option assumes 1 or 2 large urban extensions to Cambridge on land currently in the Green Belt, accommodating around 2000 dwellings. The remaining development needs would be accommodated through the partial completion of a new town at Waterbeach, the completion of an extension to the existing new settlement at Cambourne and limited development at villages.

Option 8 - Cambridge Green Belt, Waterbeach New Town, Bourn Airfield New Settlement, Cambourne West and Village Focus

This option assumes delivery of smaller sites on land currently in the Green Belt on the edge of Cambridge, provision from the partial completion of a new town at Waterbeach, the completion of an extension to the existing new settlement at Cambourne and selected development at Rural Centres and Minor Rural Centres.

Table 1 Development Packages for Sustainability Appraisal

Options by Development Sequence (South Cambs only)	Existing Supply	Opt 1		Opt 2		Opt 3		Opt 4 (was 9)	
		Existing Supply & New Sites	New Sites Only	Existing Supply & New Sites	New Sites	Existing Supply & New Sites	New Sites	Existing Supply & New Sites	New Sites
Cambridge urban area	309	309	0	309	0	309	0	309	0
Cambridge fringe sites	3,902	4,002	100	4,002	100	4,002	100	4,002	100
New settlement(s)	5,965	7,365	1,400	9,465	3,500	5,965	0	8,835	2,870
Rural Centres	1,779	4,314	2,535	2,444	665	4,314	2,535	3,969	2,190
Minor Rural Centres	1,082	2,182	1,100	1,597	515	3,477	2,395	1,287	205
Group Villages	846	846	0	846	0	846	0	846	0
Infill Villages	147	147	0	147	0	147	0	147	0
TOTAL	14,029	19,164	5,135	18,809	4,780	19,059	5,030	19,394	5,365

Options by Development Sequence (South Cambs only)	Existing Supply	Opt 5		Opt 6		Opt 7		Opt 8	
		Existing Supply & New Sites	New Sites	Existing Supply & New Sites	New Sites	Existing Supply & New Sites	New Sites	Existing Supply & New Sites	New Sites
Cambridge urban area	309	309	0	309	0	309	0	309	0
Cambridge fringe sites	3,902	4,002	100	8,002	4,100	6,002	2,100	5,032	1,130
New settlement(s)	5,965	9,665	3,700	5,965	0	7,365	1,400	7,865	1,900
Rural Centres	1,779	2,444	665	1,999	220	3,479	1,700	3,499	1,720
Minor Rural Centres	1,082	1,422	340	1,422	340	1,082	0	1,597	515
Group Villages	846	846	0	846	0	846	0	846	0
Infill Villages	147	147	0	147	0	147	0	147	0
TOTAL	14,029	18,834	4,805	18,689	4,660	19,229	5,200	19,294	5,265

Each package of sites has been tested utilising the Sustainability Objectives developed through the South Cambridgeshire Sustainability Appraisal Scoping Report, by consultants Environ.



South Cambridgeshire Local Plan Sustainability Appraisal

Draft SA Results for Packages of Sites

Prepared for:
**South Cambridgeshire District Council
Cambourne**

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1 Introduction

This draft report outlines the results of a sustainability appraisal of site packages for the South Cambridgeshire Local Plan. These packages have been selected as the reasonable alternatives which could deliver the additional 4,971 dwellings need to meet the South Cambridgeshire identified housing needs. The preferred package, when chosen following the sustainability appraisal, will contribute to a much larger development strategy for the Cambridge area, involving almost 55 % of development (18,000) houses in and on the edge of Cambridge.

This assessment builds upon work undertaken by South Cambridgeshire District Council for its site assessments.

The purpose of this assessment is to identify, describe and evaluate the likely significant effects on the environment¹ and sustainability, of the reasonable alternative packages of sites. There are 8 reasonable alternative packages which have been subject to assessment.

2 Sustainability Appraisal Methodology

This assessment builds on comprehensive assessment work at the site level which has already been undertaken by the South Cambridge District Council. It uses the same SA Framework as these previous assessments.

Key to the appraisal scoring:

Symbol	Likely effect against the SA Objective
+++	Potentially significant beneficial impact
+	Policy supports this objective although it may have only a minor beneficial impact
0	Policy has no impact or effect is neutral insofar as the benefits and drawbacks appear equal and neither is considered significant
?	Uncertain or insufficient information on which to determine or base the assessment at this stage
-	Policy appears to conflict with the objective and may result in adverse impacts
---	Potentially significant adverse impact

¹ As required by the Article 5 SEA Directive.

Option 2 - Bourn Airfield New Settlement and Village Focus

PACKAGE 2															
	Site name/category	NIAB3	BA	Rural Centres				Minor Rural Centres				Overall			
1	Previously developed land	0	+	+++	0	0	0	+++	0	0	0	+++	0	0	+
	Agricultural land	-	---	0	-	-	-	0	-	-	-	0	-	-	---
	Mineral reserves, soils	0	0	0	0	0	0	0	0	0	0	0	0	0	0
3	Air quality	-	-	0	0	0	0	0	0	0	0/-	0	0	0	-
	Noise, light pollution, odour & vibration	0	-	+++	0	0	0	-	-	-	-	+++	0	0	-
	Land contamination	+	+	+	0	0	+/0	+	0	+	+	+	0	+	+
	Water environment	0	0	0	0	0	0	0	0	0	0	0	0	0	0
4	Nature conservation interest & geodiversity	0	0	0	0	0	0	0	0	0	0	0	0	0	0
5	Habitat fragmentation, native species, habitat restoration	+	0	0	+	+	+	0	0	0	0	0	0	0	+
6	Access to wildlife & green spaces	0	+	0	0	0	0	0	0	0	+	0	0	0	+
7	Landscape character	-	0	+	0/+	0/+	0/+	0	-	0	---/-	0	0	0	-
	Townscape character	-	0	0/+	0	0	0	+++	-	-	---/-	+	0	0	-
8	Historical, archaeological, cultural	0	0/-	0	0	0/-	0	0	0	0	0	+/0	0	0	0
10	Renewable energy resources	0	+/+++	0	0	0	0	0	0	0	0	0	0	0	+
11	Flooding, SUDS	0	0	0	0	0	0	0	0	0	0	0	0	0	0
14	Open space	+++	+	0	0	+	0	0	0	0	+	0	0	0	+
16	accessibility to local services/ facilities	+++	+	+	+	+	+	+++	0	0	0	0	0	0	+
	Distance to centre	+	0	---	---	-	---	---	---	---	-	+++	-	-	-

PACKAGE 2															
	Site name/category	NIAB3	BA	Rural Centres					Minor Rural Centres					Overall	
	Quality & range of local services & facilities	0	+++/+	0	+	+	0	0/-	0	0	+	0	0	0	+++
17	Ability of people to influence decisions	0	0	0	0	0	0	0	0	0	0	0	0	0	0
18	Engagement with community activities	0	+++	0	+/0	+/0	0	0	0	0	+	0	0	0	+++
19	Business development & competitiveness	+	+++	-/0	0	0	0	0/-	0	0	0	0	0	0	+++
	Shopping hierarchy	0	0	0	0	0	0	0/-	0	0	0	0	0	0	0
20	employment opportunities in accessible locations	+++	+/+++	+	+	+	+	+++	+	+	+	0	+++	+++	+
21	investment in key community services & infrastructure	-	-	-	-	-	-	+	+++/+	+++/+	+	+	+++/+	+++/+	-
	access to education & training, & provision of skilled employees	+	-	-	-	-	-	+	+	+	-	+	+++	+++	-
22	shorter journeys, improve modal choice & integration modes	+++	0	0	0	0	0	+++	+	+	+	0	+	+	+
	distance to bus stop / rail station	+++	0	0	-	0	-	+++	+++	+	+	+++	+	+	+
	frequency of Public Transport	+	+	+	+	+	+	+++	+	+	+	---	-	-	+
	typical Public Transport Journey Time to City Centre or Market Town	+++	0	-	0	0	-	+++	0	0	0	+	+++	+++	+
	distance for cycling to City Centre or Market Town	+++	0	+	+	0	+	+++	+	+	+	+	+++	+++	+
23	safe access to the highway network	-	0/-	0	0	0/-	0	0	0	0	0	0	0	0	-

PACKAGE 2														
Site name/category	NIAB3	BA	Rural Centres				Minor Rural Centres					Overall		
safer transport network & promote use of non-motorised modes	+	+++	+	0	0	0	+++	+	+	+/+++	+	+	+	+++

Option 3 - Cambourne and Village Focus

PACKAGE 3																																						
	Site name/category	NIAB 3	CW	Rural Centres										Minor Rural Centres																Overall								
1	Previously developed land	0	0	+++	0	0	0	0	+++	0	0	0	0	0	0	0	+++	0	0	0	+++	0	0	+++	0	0	0	0	0	0	0	0	0	0	0	0	+	
	Agricultural land	-	---	0	-	-	-	-	0	-	-	-	-	-	-	-	0	0	-	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	-	
	Mineral reserves, soils	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
3	Air quality	-	0	0	0	0	0	0	0	-/0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	-	
	Noise, light pollution, odour & vibration	0	0/-	+++	0	0	0	0	-	0	0	0	0/-	-	-	-	0	-	-	-	+++	0	0	---	0	0	0	0	0	0	0	0	0	0	0	0	0/-	0/-
	Land contamination	+	0	+	0	0	+/0	0	+	0	+	+	0	0	+	+	+	0	+/0	0	+	0	0	+	0	+	+	+	+	0	0	0	+	0/+	+	+	+	
	Water environment	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
4	Nature conservation interest & geodiversity	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
5	Habitat fragmentation, native species, habitat restoration	+	+/0	0	+	+	+	0	0	0	0	0	+	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	+
6	Access to wildlife & green spaces	0	+/++ +	0	0	0	0	0	0	0	0	0	0	0	0	+	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	+
7	Landscape character	-	0/-	+	0/+	0/+	0/+	0	0	-	-	-	-	-	0	---	-	0	-	-	-	0	+	0	0/-	0	0	0/-	0/-	-	0	0	---	-	-	-	---	
	Townscape character	-	0	0/+	0	0	0	0	+++	-/0	-	-	-	-	-	---	-	0	-	-	-	+	0	0	-/0	0	0	0	0	-	0	0	---	-	-	-	---	
8	Historical, archaeological, cultural	0	0	0	0	0/-	0	0	0	0	-	-	0	0	0	0	0	0	0	0	+/0	0	0/-	-	0	0	0	0	0	0	0	0	0	0	0	0	-	
10	Renewable energy resources	0	0/+	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
11	Flooding, SUDS	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	-	
14	Open space	+++	+/++ +	0	0	+	0	0	0	+	+	+	0	0	0	+	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	+
16	accessibility to local services/ facilities	+++	+	+	+	+	+	+	+++	+	+	+	+	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	+	
	Distance to centre	+	---	---	---	-	---	---	---	-	+	0	---	---	---	-	---	-	0	-	+++	+	+	0	-	-	0	-	-	0	0	---	+++	+	+++	---		

Option 4 - Waterbeach New Town, Bourn Airfield New Settlement, and Cambourne West Focus

PACKAGE 4																	
	Site name/category	NIAB3	WNT	BA	Rural Centres							CW	Minor Rural Centres			Overall	
1	Previously developed land	0	+++	+	+++	0	0	0	+++	0	0	0	0	0	+++	0	+++
	Agricultural land	-	---	---	0	-	-	-	0	-	-	---	-	-	0	-	---
	Mineral reserves, soils	0	-	0	0	0	0	0	0	0	0	0	0	0	0	0	-
3	Air quality	-	-	-	0	0	0	0	0	0	0	0	0	0	0	0	-
	Noise, light pollution, odour & vibration	0	0	-	+++	0	0	0	-	0	0	0/-	0	0	+++	-	-
	Land contamination	+	+	+	+	0	0	+0	+	+	+	0	0	+	+	+	+
	Water environment	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
4	Nature conservation interest & geodiversity	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
5	Habitat fragmentation, native species, habitat restoration	+	+++	0	0	+	+	+	0	0	0	+0	0	0	0	0	+
6	Access to wildlife & green spaces	0	+++	+	0	0	0	0	0	0	0	+0/+++	0	0	0	0	+
7	Landscape character	-	-	0	+	0/+	0/+	0/+	0	-	-	0/-	0	0	0	-	-
	Townscape character	-	0	0	0/+	0	0	0	+++	-	-	0	0	0	+	-	-
8	Historical, archaeological, cultural	0	-	0/-	0	0	0/-	0	0	-	-	0	0	0	+0	0	-
10	Renewable energy resources	0	+++	+0/+++	0	0	0	0	0	0	0	0/+	0	0	0	0	+
11	Flooding, SUDS	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
14	Open space	+++	+++	+	0	0	+	0	0	+	+	+0/+++	0	0	0	0	+++
16	accessibility to local services/ facilities	+++	+	+	+	+	+	+	+++	+	+	+	0	0	0	0	+
	Distance to centre	+	0	0	---	---	-	---	---	+	0	---	-	-	+++	-	---
	Quality & range of local services & facilities	0	+++	+0/+++	0	+	+	0	0/-	+	+	+0/+++	0	0	0	0	+++

PACKAGE 4																	
	Site name/category	NIAB3	WNT	BA	Rural Centres							CW	Minor Rural Centres				Overall
17	Ability of people to influence decisions	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
18	Engagement with community activities	0	+++	+++	0	+/0	+/0	0	0	0	0	+/+++	0	0	0	0	+++
19	Business development & competitiveness	+	+++	+++	-/0	0	0	0	0/-	0	0	+/+++	0	0	0	0	+++
	Shopping hierarchy	0	0	0	0	0	0	0	0/-	0	0	0/+	0	0	0	0	0
20	employment opportunities in accessible locations	+++	0/+++	+/+++	+	+	+	+	+++	+++	+++	0	+++	+++	0	+	+
21	investment in key community services & infrastructure	-	-	-	-	-	-	-	+	+	+	-	+++/+	+++/+	+	+++	-
	access to education & training, & provision of skilled employees	+	-	-	-	-	-	-	+	+	+	-	+++	+++	+	-	-
22	shorter journeys, improve modal choice & integration modes	+++	+	0	0	0	0	0	+++	+++	+++	0	+	+	0	0	+
	distance to bus stop / rail station	+++	0	0	0	-	0	-	+++	+++	+++	0	+	+	+++	+	+
	frequency of Public Transport	+	+/?	+	+	+	+	+	+++	+	+	+	-	-	---	-	+
	typical Public Transport Journey Time to City Centre or Market Town	+++	+/?	0	-	0	0	-	+++	+++	+++	0	+++	+++	+	0	+
	distance for cycling to City Centre or Market Town	+++	+	0	+	+	0	+	+++	+	+	0	+++	+++	+	+	+
23	safe access to the highway network	-	---	0/-	0	0	0/-	0	0	0	-/0	0/-	0	0	0	---/-	---
	safer transport network & promote use of non-motorised modes	+	+++	+++	+	0	0	0	+++	+	+	+	+	+	+	0	+++

Option 5 - Waterbeach New Town, Bourn Airfield New Settlement and Village Focus

PACKAGE 5														
	Site name/category	NIAB3	WNT	BA	Rural Centres				Minor Rural Centres				Overall	
1	Previously developed land	0	+++	+	+++	0	0	0	+++	0	+++	0	0	+
	Agricultural land	-	---	---	0	-	-	-	0	-	0	-	-	---
	Mineral reserves, soils	0	-	0	0	0	0	0	0	0	0	0	0	-
3	Air quality	-	-	-	0	0	0	0	0	0/-	0	0	0	-
	Noise, light pollution, odour & vibration	0	0	-	+++	0	0	0	-	-	+++	0	0	-
	Land contamination	+	+	+	+	0	0	+/0	+	+	+	0	+	+
	Water environment	0	0	0	0	0	0	0	0	0	0	0	0	0
4	Nature conservation interest & geodiversity	0	0	0	0	0	0	0	0	0	0	0	0	0
5	Habitat fragmentation, native species, habitat restoration	+	+++	0	0	+	+	+	0	0	0	0	0	+
6	Access to wildlife & green spaces	0	+++	+	0	0	0	0	0	+	0	0	0	+
7	Landscape character	-	-	0	+	0/+	0/+	0/+	0	---/-	0	0	0	-
	Townscape character	-	0	0	0/+	0	0	0	+++	---/-	+	0	0	-
8	Historical, archaeological, cultural	0	-	0/-	0	0	0/-	0	0	0	+/0	0	0	-
10	Renewable energy resources	0	+++	+/+++	0	0	0	0	0	0	0	0	0	+
11	Flooding, SUDS	0	0	0	0	0	0	0	0	0	0	0	0	0
14	Open space	+++	+++	+	0	0	+	0	0	+	0	0	0	+
16	accessibility to local services/ facilities	+++	+	+	+	+	+	+	+++	0	0	0	0	+
	Distance to centre	+	0	0	---	---	-	---	---	-	+++	-	-	-
	Quality & range of local services & facilities	0	+++	+++/+	0	+	+	0	0/-	+	0	0	0	+++

PACKAGE 5														
	Site name/category	NIAB3	WNT	BA	Rural Centres				Minor Rural Centres				Overall	
1 7	Ability of people to influence decisions	0	0	0	0	0	0	0	0	0	0	0	0	0
1 8	Engagement with community activities	0	+++	+++	0	+/0	+/0	0	0	+	0	0	0	+++
1 9	Business development & competitiveness	+	+++	+++	-/0	0	0	0	0/-	0	0	0	0	+++
	Shopping hierarchy	0	0	0	0	0	0	0	0/-	0	0	0	0	0
2 0	employment opportunities in accessible locations	+++	0/+++	+/+++	+	+	+	+	+++	+	0	+++	+++	+
2 1	investment in key community services & infrastructure	-	-	-	-	-	-	-	+	+	+	+++/+	+++/+	-
	access to education & training, & provision of skilled employees	+	-	-	-	-	-	-	+	-	+	+++	+++	-
	shorter journeys, improve modal choice & integration modes	+++	+	0	0	0	0	0	+++	+	0	+	+	+
	distance to bus stop / rail station	+++	0	0	0	-	0	-	+++	+	+++	+	+	+
2 2	frequency of Public Transport	+	+/?	+	+	+	+	+	+++	+	---	-	-	+
	typical Public Transport Journey Time to City Centre or Market Town	+++	+/?	0	-	0	0	-	+++	0	+	+++	+++	+
	distance for cycling to City Centre or Market Town	+++	+	0	+	+	0	+	+++	+	+	+++	+++	+
2 3	safe access to the highway network	-	---	0/-	0	0	0/-	0	0	0	0	0	0	-
	safer transport network & promote use of non-motorised modes	+	+++	+++	+	0	0	0	+++	+/+++	+	+	+	+++

Option 6 - Cambridge Green Belt and Village Focus

PACKAGE 6										
	Site name/category	NIAB3		GB		Rural Centres		Minor Rural Centres		Overall
1	Previously developed land	0	0	+++	+++	0	+++	0	0	+
	Agricultural land	-	---	0	0	-	0	-	-	---
	Mineral reserves, soils	0	0	0	0	0	0	0	0	0
3	Air quality	-	---	0	0	0/-	0	0	0	---
	Noise, light pollution, odour & vibration	0	0	+++	-	-	+++	0	0	+
	Land contamination	+	+	+	+	+	+	0	+	+
	Water environment	0	0	0	0	0	0	0	0	0
4	Nature conservation interest & geodiversity	0	0	0	0	0	0	0	0	0
5	Habitat fragmentation, native species, habitat restoration	+	0 / +	0	0	0	0	0	0	+
6	Access to wildlife & green spaces	0	+++	0	0	+	0	0	0	+++
7	Landscape character	-	---	+	0	---/-	0	0	0	---
	Townscape character	-	---	0 / +	+++	---/-	+	0	0	---
8	Historical, archaeological, cultural	0	0/-	0	0	0	+/0	0	0	0
10	Renewable energy resources	0	0	0	0	0	0	0	0	0
11	Flooding, SUDS	0	0	0	0	0	0	0	0	0
14	Open space	+++	+++/?	0	0	+	0	0	0	+++/?
16	accessibility to local services/ facilities	+++	+++	+	+++	0	0	0	0	+++
	Distance to centre	+	0/+	---	---	-	+++	-	-	?
	Quality & range of local services & facilities	0	+++	0	0/-	+	0	0	0	+++
17	Ability of people to influence decisions	0	0	0	0	0	0	0	0	0
18	Engagement with community activities	0	+	0	0	+	0	0	0	+
19	Business development & competitiveness	+	+/?	-/0	0/-	0	0	0	0	+/?
	Shopping hierarchy	0	0	0	0/-	0	0	0	0	0
20	employment opportunities in accessible locations	+++	+++	+	+++	+	0	+++	+++	+++
21	investment in key community services & infrastructure	-	-	-	+	+	+	+++/+	+++/+	-
	access to education & training, & provision of skilled employees	+	-	-	+	-	+	+++	+++	-
22	shorter journeys, improve modal choice & integration modes	+++	+++	0	+++	+	0	+	+	+++
	distance to bus stop / rail station	+++	+/+++	0	+++	+	+++	+	+	+

PACKAGE 6										
	Site name/category	NIAB3		GB		Rural Centres		Minor Rural Centres		Overall
	frequency of Public Transport	+	+/+++	+	+++	+	---	-	-	+
	typical Public Transport Journey Time to City Centre or Market Town	+++	+/+++	-	+++	0	+	+++	+++	+
	distance for cycling to City Centre or Market Town	+++	+++	+	+++	+	+	+++	+++	+++
2	safe access to the highway network	-	-	0	0	0	0	0	0	-
3	safer transport network & promote use of non-motorised modes	+	+++/?	+	+++	+/+++	+	+	+	+++/?

Option 7 - Cambridge Green Belt, Waterbeach New Town, Cambourne West and Village Focus

PACKAGE 7							
	Site name/category	NIAB3	GB	WNT	CW	Rural Centres	Overall
1	Previously developed land	0	0	+++	0	+++	+
	Agricultural land	-	---	---	---	0	---
	Mineral reserves, soils	0	0	-	0	0	-
3	Air quality	-	---/-	-	0	0	-
	Noise, light pollution, odour & vibration	0	0	0	0/-	+++	+
	Land contamination	+	+	+	0	+	+
	Water environment	0	0	0	0	0	0
4	Nature conservation interest & geodiversity	0	0	0	0	0	0
5	Habitat fragmentation, native species, habitat restoration	+	0 / +	+++	+/0	0	+
6	Access to wildlife & green spaces	0	+++	+++	+/+++	0	+++
7	Landscape character	-	---	-	0/-	+	---
	Townscape character	-	---	0	0	0 / +	---
8	Historical, archaeological, cultural	0	0/-	-	0	0	-
10	Renewable energy resources	0	0	+++	0/+	0	+
11	Flooding, SUDS	0	0	0	0	0	0
14	Open space	+++	+++/?	+++	+/+++	0	+
16	accessibility to local services/ facilities	+++	+++	+	+	+	+++
	Distance to centre	+	0 / +	0	---	---	-
	Quality & range of local services & facilities	0	+++	+++	+/+++	0	+++
17	Ability of people to influence decisions	0	0	0	0	0	0
18	Engagement with community activities	0	+	+++	+/+++	0	+
19	Business development & competitiveness	+	+/?	+++	+/+++	-/0	+/?
	Shopping hierarchy	0	0	0	0/+	0	0
20	employment opportunities in accessible locations	+++	+++	0/+++	0	+	+
21	investment in key community services & infrastructure	-	-	-	-	-	-
	access to education & training, & provision of skilled employees	+	-	-	-	-	-
22	shorter journeys, improve modal choice & integration modes	+++	+++	+	0	0	+
	distance to bus stop / rail station	+++	+/+++	0	0	0	+
	frequency of Public Transport	+	+/+++	+/?	+	+	+

PACKAGE 7							
	Site name/category	NIAB3	GB	WNT	CW	Rural Centres	Overall
	typical Public Transport Journey Time to City Centre or Market Town	+++	+ / +++	+ / ?	0	-	+
	distance for cycling to City Centre or Market Town	+++	+++	+	0	+	+
23	safe access to the highway network	-	-	---	0/-	0	-
	safer transport network & promote use of non-motorised modes	+	+++ / ?	+++	+	+	+++

Option 8 - Cambridge Green Belt, Waterbeach New Town, Bourn Airfield New Settlement, Cambourne West and Village Focus

PACKAGE 8														
	Site name/category	NIAB3	GB	BA	CW	Rural Centres		Minor Rural Centres					Overall	
1	Previously developed land	0	0	+	0	+++	+++	0	0	0	+++	0	0	+
	Agricultural land	-	---	---	---	0	0	-	-	-	0	-	-	---
	Mineral reserves, soils	0	0	0	0	0	0	0	0	0	0	0	0	0
3	Air quality	-	-	-	0	0	0	0/-	0	0	0	0	0	-
	Noise, light pollution, odour & vibration	0	0	-	0/-	+++	-	-	-	-	+++	0	0	-
	Land contamination	+	+	+	0	+	+	+	0	+	+	0	+	+
	Water environment	0	0	0	0	0	0	0	0	0	0	0	0	0
4	Nature conservation interest & geodiversity	0	0	0	0	0	0	0	0	0	0	0	0	0
5	Habitat fragmentation, native species, habitat restoration	+	0/+	0	+0	0	0	0	0	0	0	0	0	+
6	Access to wildlife & green spaces	0	+0/+++	+	+0/+++	0	0	+	0	0	0	0	0	+
7	Landscape character	-	---	0	0/-	+	0	---/-	-	0	0	0	0	---
	Townscape character	-	---	0	0	0/+	+++	---/-	-	-	+	0	0	---
8	Historical, archaeological, cultural	0	0/-	0/-	0	0	0	0	0	0	+0	0	0	0
10	Renewable energy resources	0	0	+0/+++	0/+	0	0	0	0	0	0	0	0	+
11	Flooding, SUDS	0	0	0	0	0	0	0	0	0	0	0	0	0
14	Open space	+++	+++/?	+	+0/+++	0	0	+	0	0	0	0	0	+
16	accessibility to local services/ facilities	+++	+++	+	+	+	+++	0	0	0	0	0	0	+
	Distance to centre	+	0/-	0	---	---	---	-	---	---	+++	-	-	-
	Quality & range of local services & facilities	0	+0/+++	+++0/+	+0/+++	0	0/-	+	0	0	0	0	0	+
17	Ability of people to influence decisions	0	0	0	0	0	0	0	0	0	0	0	0	0

PACKAGE 8														
	Site name/category	NIAB3	GB	BA	CW	Rural Centres		Minor Rural Centres						Overall
18	Engagement with community activities	0	+	+++	+ /+++	0	0	+	0	0	0	0	0	+
19	Business development & competitiveness	+	+/?	+++	+ /+++	-/0	0/-	0	0	0	0	0	0	+/?
	Shopping hierarchy	0	0	0	0/+	0	0/-	0	0	0	0	0	0	0
20	employment opportunities in accessible locations	+++	+++	+ /+++	0	+	+++	+	+	+	0	+++	+++	+
21	investment in key community services & infrastructure	-	-	-	-	-	+	+	+++ /+	+++ /+	+	+++ /+	+++ /+	-
	access to education & training, & provision of skilled employees	+	-	-	-	-	+	-	+	+	+	+++	+++	-
22	shorter journeys, improve modal choice & integration modes	+++	+++	0	0	0	+++	+	+	+	0	+	+	+
	distance to bus stop / rail station	+++	+ /+++	0	0	0	+++	+	+++	+	+++	+	+	+
	frequency of Public Transport	+	+ /+++	+	+	+	+++	+	+	+	---	-	-	+
	typical Public Transport Journey Time to City Centre or Market Town	+++	+ /+++	0	0	-	+++	0	0	0	+	+++	+++	+
23	distance for cycling to City Centre or Market Town	+++	+++	0	0	+	+++	+	+	+	+	+++	+++	+
	safe access to the highway network	-	-	0/-	0/-	0	0	0	0	0	0	0	0	-
	safer transport network & promote use of non-motorised modes	+	+/?	+++	+	+	+++	+ /+++	+	+	+	+	+	+++

3.2 Cumulative performance of packages

This table presents the cumulative performance for each packages against the SA Objectives and sub-objectives.

	Package No.	1	2	3	4	5	6	7	8
1	Will it use land that has been previously developed?	+++	+	+	+++	+	+	+	+
	Will it protect and enhance the best and most versatile agricultural land?	---	---	-	---	---	---	---	---
	Will it avoid the sterilisation of economic mineral reserves? Will it minimise the degradation / loss of soils due to new development'?	-	0	0	-	-	0	-	0
3	Will it maintain or improve air quality?	-	-	-	-	-	---	-	-
	Minimise, and where possible improve on, unacceptable levels of noise, light pollution, odour and vibration?	-	-	-	-	-	+	+	-
	Will it minimise, and where possible address, land contamination?	+	+	+	+	+	+	+	+
	Will it protect and where possible enhance the quality of the water environment?	0	0	0	0	0	0	0	0
4	Will it conserve protected species and protect sites designated for nature conservation interest and geodiversity?	0	0	0	0	0	0	0	0
5	Will it reduce habitat fragmentation, enhance native species, and help deliver habitat restoration (helping to achieve Biodiversity Action Plan Targets)?	+	+	+	+	+	+	+	+
6	Will it improve access to wildlife and green spaces, through delivery and access to green infrastructure?	+	+	+	+	+	+++	+++	+
7	Will it maintain and enhance the diversity and distinctiveness of landscape character?	---	-	---	-	-	---	---	---
	Will it maintain and enhance the diversity and distinctiveness of townscape character?	-	-	---	-	-	---	---	---
8	Will it protect or enhance sites, features or areas of historical, archaeological, or cultural interest (including conservation areas, listed buildings, registered parks and gardens and scheduled monuments)?	-	0	-	-	-	0	-	0
10	Will it support the use of renewable energy resources?	+	+	0	+	+	0	+	+
11	Will it minimise risk to people and property from flooding, and incorporate sustainable drainage measures?	0	0	-	0	0	0	0	0
14	Will it increase the quantity and quality of publically accessible open space?	+++	+	+	+++	+	+++/?	+	+
16	Will it improve accessibility to key local services and facilities, including health, education and leisure (shops, post offices, pubs, sports facilities etc?)	+	+	+	+	+	+++	+++	+
	Sub-Indicator: Distance to centre	---	-	---	---	-	?	-	-
	Will it improve quality and range of key local services and facilities including health, education and leisure (shops, post offices, pubs etc?)	+++	+++	+	+++	+++	+++	+++	+
17	Will it increase the ability of people to influence decisions, including 'hard to reach' groups?	0	0	0	0	0	0	0	0

	Package No.	1	2	3	4	5	6	7	8
18	Will it encourage engagement with community activities?	+++	+++	+	+++	+++	+	+	+
19	Will it support business development and enhance competitiveness, enabling provision of high-quality employment land in appropriate locations to meet the needs of businesses, and the workforce?	+++	+++	+	+++	+++	+/?	+/?	+/?
	Will it protect the shopping hierarchy, supporting the vitality and viability of Cambridge, town, district and local centres?	0	0	0	0	0	0	0	0
20	Will it contribute to providing a range of employment opportunities, in accessible locations?	+	+	+	+	+	+++	+	+
21	Will it improve the level of investment in key community services and infrastructure, including broadband?	-	-	?	-	-	-	-	-
	Will it improve access to education and training, and support provision of skilled employees to the economy?	-	-	-	-	-	-	-	-
22	Will it enable shorter journeys, improve modal choice and integration of transport modes to encourage or facilitate the use of modes such as walking, cycling and public transport?	+	+	+	+	+	+++	+	+
	Sub-indicator: Distance to bus stop / rail station	+	+	+	+	+	+	+	+
	Sub-indicator: Frequency of Public Transport	+	+	+	+	+	+	+	+
	Sub-indicator: Typical Public Transport Journey Time to Cambridge City Centre or Market Town	+	+	+	+	+	+	+	+
23	Sub-indicator: Distance for cycling to City Centre or Market Town	+	+	+	+	+	+++	+	+
	Will it provide safe access to the highway network, where there is available capacity?	---	-	-	---	-	-	-	-
	Will it make the transport network safer for and promote use of non-motorised modes?	+++	+++	+	+++	+++	+++/?	+++	+++

3.3 Comparative Performance of Packages against each SA Objectives

SA Objective 1

Will it use land that is previously developed?

There is a limited supply of previously developed land available for development in the district, and this was reflected in the options identified through the plan making process. Therefore, all packages perform positively against this sub-objective because areas within each of the packages perform either neutrally, or have minor positive impacts, leading to a positive cumulative performance. The only packages which could utilise significant areas of previously developed land include either or both of two new settlement options, at Waterbeach and Bourn Airfield. In particular the Waterbeach new town option would involve the redevelopment of the large barracks site. There are options at the village level that would utilise previously developed land, particularly at Sawston and Gamlingay. As a result, packages 1 and 4 offer potentially significant beneficial impacts. This largely stems from the relative reliance in these packages on Waterbeach New Town which scores highly on

this sub-objective to deliver a large proportion of their housing allocations. The other packages which include this site are less reliant on it in terms of overall housing provision and include other sites with less positive performance.

Will it protect and enhance the best and most versatile agricultural land?

The scale of development needed in the district means that impact on this objective will be significant, with unavoidable loss of high grade agricultural land. All packages therefore perform poorly in relation to this sub-objective.

The major development site options are all identified as having significant negative impact on the objective, as they would involve large areas of high grade agricultural land. Some smaller villages were identified avoiding the high grade agricultural land, but they would not be sufficient to deliver the total.

Whilst the impact of a number of village sites was indicated as only minor due to their smaller scale, cumulatively packages involving a number of these sites would impacts would still be significant. Package 3 performs slightly better overall because a significant proportion of housing provision, around 34%, in this package comes from rural centres and several minor rural centre sites which have a neutral impact on the best and most versatile agricultural and from the redevelopment of the barracks at Waterbeach, However, the cumulative impact of this package of sites on agricultural land should still be noted, even if it is marginally less significantly adverse than the other packages.

Will it avoid the sterilisation of economic mineral reserves? Will it minimise the degradation / loss of soils due to new development'?

Mineral reserves are identified on the proposals map of the Cambridgeshire and Peterborough Minerals and Waste Local Development Framework. Of particular prevalence in the area are reserves of sand and gravel. The most significant site within areas identified is the Waterbeach New Town, therefore packages 1, 4, 5 and 7 conflict with this sub-objective. The other packages have no impact on this sub-objective or the effects are considered to be neutral.

SA Objective 2

This objective was scoped out of the assessment as it is not a location specific issue.

SA Objective 3

Will it maintain or improve air quality?

Growth on the scale envisaged will inherently generate traffic movements, thereby having a negative impact on air pollution regardless of location of new development.

New settlements options identified are located in areas of good air quality, but an increase in traffic and static emissions could potentially affect local air quality.

The individual assessments of large scale development sites needed to deliver this volume of development were identified as having significant negative impacts on air quality. Package 6 could have potentially significant adverse impacts because it incorporates large scale development on the edge of Cambridge (4,000 homes). In addition, sites in locations near to the A14 or the M11 would be near to areas of poor air quality, including the identified Air Quality Management Area.

This objective is intrinsically linked with the transport objectives particularly objective 22 on sustainable travel. Therefore, when considering the impacts on air quality from development of a given package, consideration also needs to be given to the performance of the package against objective 22, positive performance against which can mitigate for potential air quality impacts identified under this objective.

Minimise, and where possible improve on, unacceptable levels of noise, light pollution, odour and vibration?

It is generally possible to avoid light pollution through sensitive lighting design, in all but the darkest of landscapes.

The initial assessment of the Bourn Airfield new settlement site highlighted a potential conflict with the adjoining industrial area. This had historically resulted in noise complaints from nearby residential areas. This site was proposed in representations for redevelopment for employment uses which are more compatible with residential development, and subject to consultation through Issues and Options 2. The issue is therefore now capable of appropriate mitigation and the site's performance against this objective has therefore improved. This is case for packages 2, 4, 5 and 8.

The development packages avoid significant cumulative negative performance overall, but nonetheless there are potential minor adverse impacts. A small number of village sites offered specific opportunities to address issues, such as redevelopment of industrial areas in residential areas.

On the edge of Cambridge, package 6 has the potential to bring development closer to the M11 and A14 and therefore people closer to potential noise pollution. The individual site assessments within the package highlight these issues, but also indicate that impacts are likely to be capable of mitigation and consequently this package performs positively overall.

Package 7 has the potential for a minor positive performance for this objective, because the majority of its sites are considered to have neutral impact on achieving this objective and one has the potential for a major positive performance.

Will it protect and where possible enhance the quality of the water environment?

All packages have a neutral performance for this objective. Parts of the south east of South Cambridgeshire are identified as groundwater protection zones, associated with the underlying chalk. The majority of development within the packages would avoid these areas. Some site options around villages in these areas, like Sawston would fall within groundwater protection zones, but appropriate mitigation measures could be included to protect water quality.

SA Objective 4

Will it conserve protected species and protect sites designated for nature conservation interest and geodiversity?

All sites are outside protected areas and it has been assumed that mitigation measures could be implemented appropriately for all options, as would be required by law and planning policy.

SA Objective 5

Will it reduce habitat fragmentation, enhance native species, and help deliver habitat restoration (helping to achieve Biodiversity Action Plan Targets)?

None of the sites included in any of the packages is considered to be in conflict with this sub-objective. All packages are considered to have a cumulative positive performance since they all include sites where there are opportunities for positive enhancements to be secured through development.

Major development options identified include opportunities for habitat linkage/enhancement/restoration, and the creation of new Green Infrastructure which would provide net benefits. Waterbeach New Town (included in packages 1, 4, 5 and 7), offers potentially significant beneficial impacts through habitat creation in the north of the site, as part of mitigation measures required to preserve the setting of Denny Abbey. Packages including this site therefore perform well for this sub-objective. Although village sites may offer fewer opportunities for enhancement in terms of overall net gains, the significance of their contribution to ecological coherence of strategic habitat networks is highly dependent upon their location and the type of habitat they could provide.

SA Objective 6

Will it improve access to wildlife and green spaces, through delivery and access to green infrastructure?

The greatest potential to directly deliver new green infrastructure is with major development sites. Larger sites on the edge of Cambridge have potential to include green infrastructure, as do new settlements. Smaller village sites generally offer less potential, although they may still contribute financially to improving green space provision and access through Section 106 agreements or the Community Infrastructure Levy (CIL), they are less likely to be able to secure increases in provision levels directly.

SA Objective 7

Will it maintain and enhance the diversity and distinctiveness of landscape character?

All packages include some sites which conflict with the protection of landscape character, and therefore negative performances have been recorded.

Packages involving development on the edge of Cambridge are likely to have a significant negative impact on the landscape Character objective. The review of the Green Belt identified that it would not be possible to deliver significant additional development on the edge of

Cambridge without significant detriment to the specific purposes of the Cambridge Green Belt. These purposes highlight the importance to the historic City of Cambridge of the quality of its setting as well as the usual role of Green Belts in preventing communities from merging with one another.

The scale of the new settlement options mean that they will also impact on this objective, but they are likely to offer greater potential for mitigation, and are located in areas of lower landscape sensitivity. The setting of Denny Abbey is a particular issue for the Waterbeach new town option, and mitigation will be required to maintain its setting.

Will it maintain and enhance the diversity and distinctiveness of townscape character?

All packages include some sites which conflict with the protection of townscape character, and therefore negative performances have been recorded. Packages which include significant green belt release on the edge of Cambridge (6, 7 and 8) would have significant negative impacts on this objective. The rationale for this being that the Green Belt setting of Cambridge is identified as being particularly important to the historic character and setting of the City. The townscape impact of the new settlement options is identified as being less significant as they lie outside the Green Belt, away from Cambridge.

SA Objective 8

Will it protect or enhance sites, features or areas of historical, archaeological, or cultural interest including conservation areas, listed buildings, registered parks and gardens and scheduled monuments)?

Only packages 2, 6 and 8 have a neutral performance for this objective. A number of sites included in the packages have been assessed as being in conflict with this objective. This includes Waterbeach New Town (included in packages 1, 4, 5 and 7), where the key issue is the impact on Denny Abbey. Mitigation measures could be implemented, but there would be likely minor negative residual impacts.

The Green Belt Study 2012 highlights the importance of the Green Belt as part of the setting for the historic City of Cambridge. Packages involving development on the edge of Cambridge could negatively impact on this setting.

SA Objective 9

This objective has been scoped out of this assessment as it is not location specific. All developments will be required to be built to a high standard of design and create good spaces through the plan's policy requirements.

SA Objective 10

Will it support the use of renewable energy resources?

Large developments present potential opportunities for district heating/combined heat and power. New settlements, with a large scale, mixed uses and potentially higher density centres may offer the greatest opportunities. This accounts for the positive performance for most packages

in relation to this sub-objective. Large scale development sites on the edge of Cambridge could offer opportunities, but they are not as large as the eventual scale of the potential new settlements, hence package 6 has a neutral performance for this sub-objective. However, the potential for such low carbon energy developments is dependent on factors which are highly site-specific, which means that some caution should be applied in interpreting these performances. The focus of package 3 on smaller scale village development means that this package is the least likely to offer opportunities for district heating or combined heat and power, meaning that this package is unlikely to positively support this sub-objective and is more likely to have a neutral effect.

Two SA sub-objectives have been scoped out, because all new development will be required to promote energy efficiency, and minimise contributions to climate change through sustainable construction practices. This will be ensured by adherence with building regulations and through policies within the plan.

SA Objective 11

Will it minimise risk to people and property from flooding, and incorporate sustainable drainage measures?

All of the packages are seen to be neutral in relation to this sub-objective apart from package 3, which includes a site which is partially in flood zones 2 and 3.

The SA sub-objective regarding sustainable water use has been scoped out as this development design rather than development location specific and all development will have to be implemented to enable and encourage high levels of water efficiency.

SA Objectives 12 and 13

These two objectives have been scoped out because they relate predominantly to design specific issues rather than locational issues.

SA Objective 14

Will it increase the quantity and quality of publically accessible open space?

No sites within any of the packages have a negative performance for this objective and all packages perform positively for the provision of public open space. General planning policies require provision of open space to meet the needs generated through new development.

Package 3 because of its dispersed approach to development around villages, may give rise to fewer opportunities to deliver more than the minimum open space requirements, and such infrastructure investment will inherently be more dispersed, but in doing so it could achieve a wider spatial distribution of new provision. Specific opportunities will depend on how the developments evolve.

Waterbeach New Town (included in packages 1, 4, 5 and 7), offers potentially significant beneficial impacts because of the new open space which would be provided as part of this development.

SA Objective 15

All the housing sub-objectives have been scoped out of this assessment because they relate primarily to the type and mix of provision which will be controlled through the plan policies are therefore not specific to location of development.

All of the sites were generally assumed to be neutral in relation to the sub-objective for provision of accommodation for gypsies, travellers and travelling show people, because the plan is proposing no specific site allocations.

SA Objective 16

This objective has been scoped out because all developments will be expected to improve social relations.

SA Objective 17

Will it improve accessibility to key local services and facilities, including health, education and leisure (shops, post offices, pubs, sports facilities etc?)

Packages 6 and 7, which include the most significant levels of development on the edge of Cambridge, offer potentially the most significant positive performance in relation to this sub-objective because of the proximity of development to the higher order services and facilities available within Cambridge. Development of a new town would include its own town centre and facilities, although in the case of Waterbeach much of this would be delivered beyond the plan period, and so the short and medium term performance for this sub-objective would be less positive than in the longer term.

Other packages include development at the Rural Centre / Minor Rural Centre level, ensuring that new housing would be accessible to local services and facilities. Package 3, which has the most village focus, incorporates the most sites with a negative score against this sub-objective but, on balance, even this package scores positively overall. Because none of the packages include housing provision on new sites beyond the better served group villages, none of the packages is in conflict with this sub-objective overall.

Distance to local centres is one measure of accessibility, and this varies by individual site. Significant major developments would be likely to incorporate new local centres, thereby ensuring services and facilities are accessible to the new population. Smaller developments are more likely to be reliant on existing centres.

Most village level options are located on the edges of villages, meaning that in some cases site score relatively poorly against the objective. In the case of package 7 and 8, which would include some development on the edge of Cambridge, smaller urban extensions may not include new local centres, and site specific appraisals indicated that some sites were a significant distance from existing local centres.

Packages 1, 3 and 4 incorporate a relatively high level of housing provision in villages so are in conflict with this sub-objective and may result in potentially significant adverse impacts as many village sites are at some distance from existing village centres. They also rely on development

in Cambourne west, which generally performs poorly against distance to centre, although it does adjoin a new secondary school so its performance for education access is good. There is also a small supermarket nearby in Lower Cambourne. In particular, package 4 relies on it to deliver over a quarter of its housing provision. The overall performance of Cambourne west depends upon whether it is likely to deliver a local centre, and therefore provision of a local centre should be an integral part of the development delivery.

In contrast, the other packages have a greater reliance on new settlements and/or major development sites and generally these perform better because it is assumed that they would be able to deliver new local centres through masterplanning of these sites. Overall, however, these packages are still in conflict with this sub-objective.

Will it improve quality and range of key local services and facilities including health, education and leisure (shops, post offices, pubs etc?)

The assessment of individual sites assumed that larger focused developments have more potential to deliver a range of new services, whilst more scattered village development would reduce the likely impact of investment, and could put additional pressure on existing village services.

Consequently, package 3 performs less positively as it does not include a new settlement and is additionally the most reliant on village development. By comparison, the other packages perform well for this objective.

SA Objective 18

Will it encourage engagement with community activities?

New development is required by plan policies to provide community facilities to meet the needs generated, and will therefore contribute to supporting engagement with community activities. The assessment of individual sites assumed that larger more focused developments are more likely to be able to deliver a wider range of new services. On this basis packages 1, 2, 4 and 5, which include new settlements, are more likely to perform well and provide positive support for this sub-objective. Conversely, that scattered village development would be less likely to be able to, and could in some cases put additional pressures on existing village services. On this basis Package 3 does not include a new settlement, performs less positively.

SA Objective 19

Will it support business development and enhance competitiveness, enabling provision of high-quality employment land in appropriate locations to meet the needs of businesses, and the workforce?

New settlements would be mixed use developments incorporating provision of employment land, hence the strongly positive performance for the packages providing new settlements (1, 2, 4, 5, 7 and 8) and the less positive performance for package 3, which would not deliver a new settlement. Some development proposals on the edge of Cambridge would also be mixed use. It should be noted, however, that much of the employment at Waterbeach (included in options 1, 4, 5 and 7) may be delivered beyond plan period.

Will it protect the shopping hierarchy, supporting the vitality and viability of Cambridge, town, district and local centres?

The individual site assessments assumed that the plan's policy requirements would mean that new centres may be delivered to meet local needs, but that they would be required not to be of such a scale to harm the shopping hierarchy. Therefore, all packages are deemed to have a neutral performance for this sub-objective.

SA Objective 20

Will it contribute to providing a range of employment opportunities, in accessible locations?

The site assessments focused on accessibility to major employment opportunities, using accession modelling for journey lengths. All of the packages support this objective, with package 6 offering potentially significant beneficial impacts because of the concentration of development on the edge of the most significant existing employment area, that being Cambridge. New settlement sites are currently not as close to major employment areas, but as mixed use used new employment opportunities are likely to lead to increased access to employment in the longer term, and therefore these are likely to perform slightly better than the village focused packages.

SA Objective 21

Will it improve the level of investment in key community services and infrastructure, including broadband?

During the earlier assessment of individual sites it was assumed that larger sites will need investment in infrastructure and that they cannot rely on existing provision. Since all packages include large sites they all record a negative performance against this sub-objective except for package 3. Package 3 incorporates a diversity of sites including sites with significantly positive and minor negative performance for this sub-objective, such that an overall performance is difficult to judge with any level of certainty.

Will it improve access to education and training, and support provision of skilled employees to the economy?

Even after allowing for surplus school places, development on the scale incorporated in each of the packages would require an increase in school planned admission numbers, which would require the expansion of existing schools and/or provision of new schools. All of the packages therefore conflict with this objective and may result in adverse impacts unless new schools were provided.

SA Objective 22

Will it enable shorter journeys, improve modal choice and integration of transport modes to encourage or facilitate the use of modes such as walking, cycling and public transport?

Sub-indicator: Distance to bus stop / rail station

Sub-indicator: Frequency of Public Transport

Sub-indicator: Typical Public Transport Journey Time to Cambridge City Centre or Market Town

Sub-indicator: Distance for cycling to City Centre or Market Town

All of the packages support this sub-objective and score positively against the sub-indicators.

Development close to the edge of Cambridge would support access opportunities by alternative modes, although access to public transport services is better close to radial routes with good services, and some areas around the City currently have more limited access to high quality public transport. Larger developments could be accessed by new public transport routes. This means that package 6 would perform particularly well against this objective because of the concentration of development on the edge of Cambridge.

New settlements (included in packages 1, 2, 4, 5, 7 and 8) could incorporate significant public transport routes to Cambridge, and new town and local centres as appropriate, to ensure that residents have convenient access to local services and facilities by walking, cycling and public transport. They have the potential to enable focussed investment in public transport and cycling infrastructure, delivering high quality services to provide a significantly higher modal share of travel by non-car modes than village based growth options. Dispersing development around villages would be more likely to deliver incremental improvements, rather than focused investment. But this could benefit existing communities. Traffic impacts would be spread more around the district, but there would be a higher modal share for car use. Outside the Rural Centres public transport services are generally limited in terms of frequency and journey time. Cycling opportunities would also be lower than other strategy approaches, as distances to Cambridge or market towns would be greater, and would often rely on rural roads rather than dedicated routes. This would particularly impact on package 3 as the most village based option.

The sub-objective on the movement of freight has been scoped out of this assessment because this assessment is dealing specifically with housing allocations.

SA Objective 23

Will it provide safe access to the highway network, where there is available capacity?

A wide range of sites are in conflict with this sub-objective, which results in a negative performance for all packages. A major negative performance is recorded for packages 1 and 4 because of their reliance on Waterbeach New Town. The site assessment suggests that this development may result in potentially significant adverse impacts because of insufficient capacity on existing roads although mitigation measures are being explored to address this, including improved access to rail, road improvements and bus improvements. It should also be noted that by the end of the plan period, only a small proportion of the new town will be built, reducing the scale of the impacts at that time.

Will it make the transport network safer for and promote use of non-motorised modes?

The site assessments for the new settlements at Waterbeach New Town and Bourn Airfield suggest that they could potentially lead to significant improvement to public transport, walking or cycling facilities. Transport evidence suggests this would increase modal share by sustainable modes compared to more dispersed development strategies.

Similarly, the greenbelt developments are seen to be of a sufficient scale to enable associated improvements to the transport network. This accounts for the strongly positive performances for all packages except package 3, although there is some uncertainty as it would depend on the opportunities provided by specific sites. Nonetheless, package 3 includes a larger number of smaller developments, which would offer less potential to generate significant investment in transport infrastructure.

3.4 Commentary on Sustainability Performance of Packages

This section describes how each package performs across the range of SA objectives and sub-objectives. This section does not seek to describe all the effects, but to highlight the significant sustainability effects of the packages, or those effects which differentiate the packages' performances.

Option 1 - Waterbeach New Town, Cambourne West and Village Focus

This package includes provision from a new town at Waterbeach, the completion of an extension to the existing new settlement at Cambourne and development at a range of villages down to the Better Served Group Village level.

Waterbeach New Town scores strongly against a relatively large number of sub-objectives and, because of its relative reliance on this site, this is reflected in the overall scores for this package. It performs strongly in relation to:

- Use of previously developed land;
- Provision of open space;
- Quality and range of local services and facilities;
- Engagement with community activities;
- Business development and competitiveness; and
- Safety of the transport network and promotion of non-motorised modes

As with all of the packages, it performs poorly in relation to the use of agricultural land. Both Waterbeach New Town and Cambourne West would involve the loss of significant amounts of agricultural land and this would be compounded by cumulatively significant further loss from a large number of village sites.

The inclusion of a large number of village sites which are considered to be sensitive in landscape terms means that the cumulative impact on landscape character is likely to be significant in this package. Significant mitigation measures will be required, particularly when the town would reach its eventual size.

Its inclusion of a large number of village sites, many of which are some distance from existing centres, also means it scores poorly in relation to the 'distance to centre' sub-indicator. The issues with highway capacity for the Waterbeach New Town site also result in this package performing poorly in terms of providing safe access to the highway network.

In relation to the infrastructure objectives, there is a contrast between the more positive scores for the sites in minor village centre and the more negative scores for the new settlements and larger village sites, where investment in infrastructure would be required. In spite of the inclusion of a significant number of smaller village sites, we have assessed the balance overall as being negative.

Option 2 - Bourn Airfield New Settlement and Village Focus

This package includes the completion of a new settlement at Bourn Airfield within the plan period, and limited development in Rural Centres and Minor Rural Centre villages to meet the remaining requirement.

Unlike Waterbeach New Town, only approximately one third of the Bourn Airfield site is previously developed land and it also scores less strongly in relation to the provision of open space. Because of its heavy reliance on the Bourn Airfield site, this is reflected in the overall scores for this package, with fewer strongly positive scores than package 1.

However, it performs slightly better than package 1 in relation to the distance to centre sub-indicator because so much of the provision in this package would be served by a new centre on the Bourn Airfield site, with less provision on village sites. The absence of significant capacity constraints on the highway network for the Bourn Airfield site also means it performs better than package 1 in relation to the sub-indicator for safe access to the highway network.

Option 3 - Cambourne and Village Focus

This package adopts a village-focused approach. It includes completion of an extension to the existing new settlement at Cambourne, with the remainder of new development focused on other villages. At Waterbeach, there would be no new settlement, but the redevelopment of the barracks themselves would accommodate around 900 dwellings.

Overall, this package does not strongly support any of the sub-objectives.

Although the Waterbeach barracks development would not result in the loss of agricultural land, the cumulative loss of agricultural land across a large number of village sites means that there is still conflict with this sub-objective, albeit to a lesser degree than the other packages as it could deliver the largest number of houses without using agricultural land.

Although individual site impacts may be relatively minor, the cumulative impacts on landscape and townscape character from this package are likely to be significant, although some impacts may be capable of partial mitigation through design and siting.

As with the other packages with a strong reliance on village development, it scores poorly in relation to access to services and facilities, placing larger amounts of development in lower order centres than any other package.

Larger scale developments are more likely to incorporate new provision of services, facilities, employment space and transport facilities. The reliance on smaller sites in this package therefore results in this package performing less positively in relation to:

- Quality and range of local services and facilities;
- Engagement with community activities;
- Business development and competitiveness;
- Safety of the transport network and promotion of non-motorised modes.

Option 4 - Waterbeach New Town, Bourn Airfield New Settlement, and Cambourne West Focus

This package includes provision from the partial completion by 2031 of a new town at Waterbeach, the partial completion of a new settlement at Bourn Airfield, the completion of an extension to the existing new settlement at Cambourne. This would be supported by selected development at Rural Centres and Minor Rural Centres.

The overall scores for this package largely mirror the scores for package 1, with strongly positive scores for:

- Use of previously developed land;
- Provision of open space;
- Quality and range of local services and facilities;
- Engagement with community activities;
- Business development and competitiveness;
- Safety of the transport network and promotion of non-motorised modes.

It has strongly negative scores for use of agricultural land, distance to centre and (because of the highways issues relating to Waterbeach New Town) provision of safe access to the highway network.

It does, however, represent a lower level of landscape impact than package 1 in terms of landscape character because the large number of sensitive village sites in option 1 are largely replaced in this package with the Bourn Airfield site, which is not considered to be sensitive. It is probably also marginally less sensitive in terms of townscape character, although the differences are too subtle to be picked up in terms of the overall performance of the packages at this level of assessment.

Option 5 - Waterbeach New Town, Bourn Airfield New Settlement and Village Focus

This package includes provision from the partial completion by 2031 of a new town at Waterbeach, the partial completion of a new settlement at Bourn Airfield (but more than Option 4 assumes, which is offset by less reliance on development at Rural Centres and Minor Rural Centres).

Its relative reliance on the Bourn Airfield site means that its scores largely mirror the scores for package 2. The focus on new settlements means that it is likely to result in provision of new services, facilities, employment space and transport facilities, meaning it performs strongly in relation to:

- Quality and range of local services and facilities;
- Engagement with community activities;
- Business development and competitiveness;
- Safety of the transport network and promotion of non-motorised modes.

The relatively low provision in villages also means that this package is likely to have less cumulative impact on landscape and townscape character than those with a strong reliance on village development or on other sensitive sites.

Option 6 - Cambridge Green Belt and Village Focus

This package assumes 2 or 3 large urban extensions to Cambridge on land currently in the Green Belt. This would accommodate around 4000 dwellings. This would be supported by selected village sites at Rural Centres and Minor Rural Centres, with a focus on previously developed land.

Delivering this scale of development on the edge of Cambridge would require sites which would have a significant negative impact on the landscape and townscape character objectives and on air quality. The review of the Green Belt identified that it would not be possible to deliver significant additional development on the edge of Cambridge without significant detriment to the specific purposes of the Cambridge Green Belt. These purposes highlight the importance to the historic City of Cambridge of the quality of its setting as well as the usual role of Green Belts in preventing communities from merging with one another.

The major Green Belt sites could offer significant potential for the provision of green infrastructure, which results in this package and package 7 performing strongly in relation to this sub-objective. Because of the proximity of much of the development to Cambridge, these packages also strongly support the sub-objective of improving accessibility to key local services and facilities. In addition, the provision of new services and facilities which would be required as part of the urban extensions included in this package mean that this package would improve the quality and range of key local services and facilities.

The edge of Cambridge focus of this package also results in strongly positive scores for a number of the sustainable travel and transport infrastructure sub-objectives, including: contributing to provision of employment opportunities in accessible locations; and enabling shorter

journeys, improving modal choice and integration of transport modes. It also performs well against the sub-indicator for 'distance for cycling to city centre'.

Option 7 - Cambridge Green Belt, Waterbeach New Town, Cambourne West and Village Focus

This option assumes 1 or 2 large urban extensions to Cambridge on land currently in the Green Belt, accommodating around 2000 dwellings. The remaining development needs would be accommodated through the partial completion of a new town at Waterbeach, the completion of an extension to the existing new settlement at Cambourne and development at 1 village.

Delivering this scale of development on the edge of Cambridge would require sites which would have a significant negative impact on the landscape and townscape character objectives. The review of the Green Belt identified that it would not be possible to deliver significant additional development on the edge of Cambridge without significant detriment to the specific purposes of the Cambridge Green Belt. These purposes highlight the importance to the historic City of Cambridge of the quality of its setting as well as the usual role of Green Belts in preventing communities from merging with one another.

The major Green Belt sites could offer significant potential for the provision of green infrastructure, which results in this package and package 6 performing strongly in relation to this sub-objective. Because of the proximity of much of the development to Cambridge, these packages also strongly support the sub-objective of improving accessibility to key local services and facilities. It performs less well than package 6 for access to employment opportunities, although still positively. In addition, the provision of new services and facilities which would be required as part of the urban extensions included in this package mean that this package would improve the quality and range of key local services and facilities.

As with all the packages this one would lead to loss of high grade agricultural land. As above the scale of development on the edge of Cambridge would result in significant negative impact on the landscape and townscape objective.

There are fewer strongly positive scores, for example regarding sustainable travel and transport infrastructure sub-objectives.

Option 8 - Cambridge Green Belt, Bourn Airfield New Settlement, Cambourne West and Village Focus

This option assumes delivery of smaller sites on land currently in the Green Belt on the edge of Cambridge, the partial completion of a new settlement at Bourn Airfield, the completion of an extension to the existing new settlement at Cambourne and selected development at Rural Centres and Minor Rural Centres.

Delivering this scale of development on the edge of Cambridge would require sites which would have a significant negative impact on the landscape and townscape character objectives. The review of the Green Belt identified that it would not be possible to deliver significant additional development on the edge of Cambridge without significant detriment to the specific purposes of the Cambridge Green Belt. These purposes highlight the importance to the historic City of Cambridge of the quality of its setting as well as the usual role of Green Belts in preventing communities from merging with one another.

As with all the packages this one would lead to significant loss of high grade agricultural land. This package would result in significant harm to landscape and townscape character on the edge of Cambridge. There are some larger sites in the package which have negative or uncertain performances for safe highway access.

The package performs less well than package 6 for access to employment opportunities, although still positively.

The only strongly positive performance is for this package is for objective 23, relating to the sub-objective of transport network safety and promoting the use of non-motorise transport modes.

APPENDIX 6: AUDIT TRAIL FOR REJECTED SITE ALLOCATIONS

ISSUES AND OPTIONS 2: SUMMARY REPRESENTATIONS AND KEY ISSUES FOR SITES WHICH WERE NOT PUT FORWARD FOR ALLOCATION IN THE CAMBRIDGE LOCAL PLAN 2014: PROPOSED SUBMISSION

1. This is part of the audit trail setting out the origin and evaluation of sites brought forward for allocation in the Cambridge Local Plan 2014: Proposed Submission. The schedule below addresses the responses only to five proposed site allocations within the Issues and Option 2 Part 2 consultation, where the sites have not gone forward as a part of the Proposed Submission consultation. The approach has been to:

1. Summarise the issues under sub heading of support, object and comment;
2. Distil out a small number of key issues that fundamentally affect the appropriateness of allocating the site; and
3. Set out a short response to these issues.

2. A red, amber or green ranking was awarded to each site in the schedule on the basis of this analysis:

Red – Major planning objections to the allocation

Amber – Significant planning concerns expressed, but can be addressed

Green – No significant planning objections to the allocation (including any existing Local Plan and Area Action Plan sites)

Rejected Sites from Chapter D: Residential Site Options Within Cambridge (Issues and Options 2 consultation)

Site Number: R18		
Location: 21-29 Barton Road		
Total representations: 16		
Object: 8	Support: 4	Comment: 4
KEY ISSUES ARISING FROM CONSULTATION		
Objections	<ul style="list-style-type: none"> • Loss of existing buildings and trees – demolition of flats would harm area • Flats should be retained and listed • Inappropriate high density proposed • 3-4 storeys not acceptable • Adverse impact on amenity of Millington Road Nursery School • Increased traffic 	
Support	<ul style="list-style-type: none"> • Fully support development • Would improve sub standard accommodation • Replacement of warehouse welcome 	

Comments	<ul style="list-style-type: none"> • For student accommodation • Refurbish existing buildings for student use • Preserve communal gardens • Must be high quality development • Need to consider traffic options • Access onto Barton Road should be achievable • No access to Millington Road • Provide adequate parking in redevelopment
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ANLYSIS OF KEY ISSUES AND OFFICER RESPONSE

Representations: total 16; object 8; support 4; comment 4.

Key issues are:

- i. The loss existing buildings, trees and garden at front of site
 - a. The group of buildings does contribute positively to the Conservation Area and English Heritage has made major representation to this effect. There is an opportunity for refurbishment and renewal.
- ii. Need for careful design in sensitive location
 - a. This can be addressed through planning and design, however, it is by no means certain that a sufficiently sensitive scheme will be realised
- iii. Ensuring satisfactory access
 - a. The County Council raises no highway objections and says access onto Barton Road should be achievable

The consultation has raised no issues not identified in the Issues and Options 2 Part 2 report.

Red – Major planning objections to the allocation (This site has been removed because of conservation issues.)

Site Number: R20		
Location: Abbey Football Stadium		
Total representations: 45		
Object: 34	Support: 1	Comment: 10
KEY ISSUES ARISING FROM CONSULTATION		
Objections	<ul style="list-style-type: none"> • Preserve historic communal site • Will result in relocation to less appropriate greenfield site • Relocation will make it difficult to re-establish League Football in Cambridge • Loss of sports ground must be mitigated without impact on Green Belt • Support development of better community stadium • Expand and improve stadium • Ice rink could fit into stadium area • Loss of allotments • Loss of green space around stadium • Over development • Adverse impact on neighbouring properties • Increased flood risk 	

	<ul style="list-style-type: none"> • Adverse impact on traffic and parking
Support	<ul style="list-style-type: none"> • Support development if stadium can be relocated successfully
Comments	<ul style="list-style-type: none"> • Alternative stadium must be provided • Develop full community stadium by taking in allotments, which should be relocated • Suitable for student accommodation, stand alone or mixed use • Give back some land to allotments • Development must not impact on Coldham's Common and spoil views, no overlooking • Respect passage right of way to 536-554 Newmarket Road • Concern about impact on traffic and parking • Need to consider traffic options • Review public transport access and pedestrian and cycle links • Existing junction at Newmarket Road/Ditton Walk should be reviewed and need for improvements taken into consideration • Consider increased use of the cyclist path over Coldham's Common

ANLYSIS OF KEY ISSUES AND OFFICER RESPONSE

Representations: total 45; object 34; support 1; comment 10. The consultation elicited a large number of objections. Many of these were concerned with the impact on the allotments; and there were significant concerns about the relocation of the stadium

Key issues are:

- i. The successful reallocation of the stadium onto an acceptable site
 - a. The stadium meets a clear and important need and no satisfactory alternative location has been found
- ii. The impact on allotments, including the restoration of those previously taken
 - a. Importance agreed and will be taken into account in future discussions on the future of the stadium
- iii. Ensuring satisfactory access
 - a. The County Council raises no highway objections, but says the existing junction at Newmarket Road/Ditton Walk should be reviewed and the need for improvements taken into consideration

The consultation report raised the option of development on the allotment land to the south, but did not address this in the pros and cons. Otherwise the consultation has raised no issues not identified in the Issues and Options 2 Part 2 report. However, in the absence of finding an acceptable site for a replacement stadium this allocation is withdrawn.

Red – Major planning objections to the allocation (This site has been removed because of the failure to find an alternative location for this important facility.)

Rejected Sites from Chapter H: Employment site options within Cambridge (Issues and Options 2 consultation)

Site Number: E1		
Location: Orwell House, Orwell Furlong		
Total representations: 12		
Object: 2	Support: 6	Comment: 4
KEY ISSUES ARISING FROM CONSULTATION		
Objections	<ul style="list-style-type: none"> • Need new sites to create further capacity for employment • Will exacerbate congestion on Milton Road 	
Support	<ul style="list-style-type: none"> • Agree with allocation • Should be included in masterplan for Cambridge Northern Fringe East • With improved priority for cycles 	
Comment	<ul style="list-style-type: none"> • Possible site for community stadium • Possible site for student accommodation, either as stand alone scheme or as part of mixed use • Include some residential development • Consider connection to new Chesterton Station • Access onto Cowley Road should be achievable • Within consultation zone for Waste Water Treatment Works (WWTW) and assessment indicated risk of odour nuisances 	
ANALYSIS OF KEY ISSUES AND OFFICER RESPONSE		
<p>Representations: total 12; object 2; support 6; comment 4. There is significantly more support and comment than objection.</p> <p>Key issues are:</p> <ol style="list-style-type: none"> i. Need to be part of planning for Northern Fringe East <ol style="list-style-type: none"> a. Agreed the site will be covered by a policy looking at the long term, comprehensive redevelopment of the area ii. The inclusion of alternative uses <ol style="list-style-type: none"> a. The inclusion of alternative uses, including residential, is not likely in the short term while the WWTW continues to emit odour. Other uses may be considered. iii. Potential adverse impact of proximity to WWTW <ol style="list-style-type: none"> a. Can be dealt with through planning and design for appropriate mitigation iv. Traffic and access <ol style="list-style-type: none"> a. The County Council raises no highway objections and says access to Cowley road should be achievable <p>Apart from the issue of alternative uses, the consultation has raised no fundamental issues not identified in the Issues and Options 2 Part 2 report.</p>		
<p>Green – No significant planning objections to the allocation (Not proposed to allocate because the future Cambridge Northern Fringe East Area Action Plan will determine final development opportunities in this area.)</p>		

Site Number: E2		
Location: St John's Innovation Park		
Total representations: 14		
Object: 2	Support: 7	Comment: 5
KEY ISSUES ARISING FROM CONSULTATION		
Objections	<ul style="list-style-type: none"> • Need new sites to create further capacity for employment 	
Support	<ul style="list-style-type: none"> • Agree with allocation • Should be included in masterplan for Cambridge Northern Fringe East 	
Comment	<ul style="list-style-type: none"> • St John's site provides good quality buildings – not sure further development is needed • Car parking already a problem in the area – provide underground car park • Support with transport improvements • Consider connection to new Chesterton station • WWTW should be moved as a priority • Within consultation zone for the WWTW and assessment indicated risk of odour nuisances 	
ANALYSIS OF KEY ISSUES AND OFFICER RESPONSE		
<p>Representations: total 14; object 2; support 7; comment 5. There is significantly more support and comment than objection.</p> <p>Key issues are:</p> <ol style="list-style-type: none"> i. Need to be part of planning for Northern Fringe East <ol style="list-style-type: none"> a. Agreed the site will be covered by a policy looking at the long term, comprehensive redevelopment of the area ii. The need for this site to be redeveloped <ol style="list-style-type: none"> a. There may be potential for new buildings in the short term, over a longer period some buildings may be redeveloped iii. Potential adverse impact of proximity to WWTW <ol style="list-style-type: none"> a. A long term strategy for the area will be developed that allows for, in the short term, the continued operation of the WWTW, but allows for potential changes to be considered in the long term. In the short term odour impacts can be dealt with through planning and design and appropriate mitigation measures iv. Traffic and access <ol style="list-style-type: none"> a. The County Council raises no highway objections <p>Apart from the issue of whether the site needs to be redeveloped, the consultation has raised no fundamental issues not identified in the Issues and Options 2 Part 2 report.</p>		
<p>Green – No significant planning objections to the allocation (Not proposed to allocate because the future Cambridge Northern Fringe East Area Action Plan will determine final development opportunities in this area.)</p>		

Site Number: E3		
Location: Merlin Place		
Total representations: 8		
Object: 2	Support: 4	Comment: 2
KEY ISSUES ARISING FROM CONSULTATION		
Objections	<ul style="list-style-type: none"> • Need new sites to create further capacity for employment • Will exacerbate congestion on Milton Road 	
Support	<ul style="list-style-type: none"> • Agree with allocation • Should be included in masterplan for Cambridge Northern Fringe East • Need for transport improvements 	
Comment	<ul style="list-style-type: none"> • Consider connection to new Chesterton station • Within consultation zone for sewage treatment works and assessment indicated risk of odour nuisances 	
ANALYSIS OF KEY ISSUES AND OFFICER RESPONSE		
<p>Representations: total 8; object 2; support 4; comment 2. There are more support and comment representations than objection.</p> <p>Key issues are:</p> <ol style="list-style-type: none"> i. Need to be part of planning for Northern Fringe East <ol style="list-style-type: none"> a. Agreed the site will be covered by a policy looking at the long term, comprehensive redevelopment of the area ii. The relocation of the WWTW <ol style="list-style-type: none"> a. A long term strategy for the area will be developed that allows for, in the short term, the continued operation of the WWTW, but allows for potential changes to be considered in the long term. iii. Potential adverse impact of proximity to WWTW <ol style="list-style-type: none"> a. Can be dealt with through planning and design for appropriate mitigation iv. Traffic and access <ol style="list-style-type: none"> a. The County Council raises no highway objections <p>The consultation has raised no fundamental issues not identified in the Issues and Options 2 Part 2 report.</p>		
<p>Green – No significant planning objections to the allocation (Not proposed to allocate because the future Cambridge Northern Fringe East Area Action Plan will determine final development opportunities in this area.)</p>		

APPENDIX 7: PUBLIC NOTICE FOR CONSULTATION ON THE CAMBRIDGE LOCAL PLAN 2014: PROPOSED SUBMISSION

Cambridge City Council Cambridge Local Plan Review

Notice of publication of the Cambridge Local Plan 2014 – Proposed Submission (2013) for public consultation



Cambridge City Council is in the process of preparing a new Local Plan. We are now ready to go out to consultation with a Proposed Submission version of the Cambridge Local Plan 2014 and its associated Policies Map. This plan (if approved) will replace the current Cambridge Local Plan 2006. This consultation follows on from the Issues and Options Consultation held in June/July 2012 and the Issues and Options 2 consultation held in January/February 2013. The City Council has worked closely with South Cambridgeshire District Council on the development strategy for the wider Cambridge area and site allocations on the edge of Cambridge, which were also consulted upon during the Issues and Options 2 consultation

The Cambridge Local Plan 2014 – Proposed Submission and the Policies Map guide decisions on matters ranging from the location of new housing, schools, parks and open spaces to the design requirements of new buildings and also allocate land for future development. The Plan covers the whole of the administrative area of Cambridge City Council.

The ten-week consultation period on the documents and their associated Sustainability Appraisal is from **9am on 19th July 2013 until 5pm on 30th September 2013.**

The Cambridge Local Plan 2014 – Proposed Submission, the Policies Map, the associated Sustainability Appraisal and the Statement of Consultation undertaken in preparing the Plan are available for inspection:

- Online on the City Council's website:
<https://www.cambridge.gov.uk/draft-local-plan-2014>
- At Cambridge City Council's Customer Service Centre at Mandela House, 4 Regent Street, Cambridge, CB2 1BY at the following times: Monday: 8am to 5.15pm, Tuesday: 9am to 5.15pm, Wednesday: 9am to 6pm, Thursday: 9am to 5.15pm, Friday: 9am to 5.15pm

You can also visit exhibitions and speak to representatives of the Council as follows:

- 22 July – Trumpington Pavillion, Paget Road, Cambridge - 2.30pm to 7.30pm
- 23 July – Large Hall, Guildhall, Market Square, Cambridge - 2.30pm to 7.30pm
- 24 July - the Dublin Suite, Cambridge United Football Club, Newmarket Road, Cambridge - 2.30pm to 7.30pm
- 26 July - Memorial Hall, Woollards Lane, Great Shelford - 2.30pm to 7.30pm

- 26 July - Large Meeting Room, Cherry Hinton Village Centre, Colville Road, Cambridge - 2.30pm to 7.30pm
- 29 July – Seminar Room, Wolfson College, Barton Road, Cambridge – 2.30pm to 7.30pm
- 31 July - Meadows Community Centre, 1 St Catharine's Road, Cambridge - 2.30pm to 7.30pm
- 27 August - Castle Street Methodist Church, Castle Street, Cambridge - 2.30pm to 7.30pm
- 28 August – The Hall, Queen Emma Primary School, Gunhild Way, Cambridge - 2.30pm to 7.30pm
- 4 September – Large Hall, Guildhall, Market Square, Cambridge - 2.30pm to 7.30pm
- 5 September – Histon and Impington Village College, New Road, Impington - 2.30pm to 7.30pm²⁰
- 6 September - Brown's Field Youth and Community Centre, 31a Green End Road, Cambridge - 2.30pm to 7.30pm
- 7 September – Bharat Bhavan (Old Library), Mill Road, Cambridge – 11am to 5pm

The County Council will also be present at the exhibitions to talk about their transport strategy for Cambridge and South Cambridgeshire.

The Consultation documents and Sustainability Appraisals can also be purchased from the Customer Service Centre (Tel: 01223 457000).

Comments should be made using:

- The online response system available on the City Council's website <http://cambridge.jdi-consult.net/ldf/>;
- Printed response forms are available from the Customer Service Centre (as above) or can be downloaded and filled in electronically by visiting <https://www.cambridge.gov.uk/draft-local-plan-2014>

Completed response forms should be sent to:

- Draft Local Plan Consultation, Planning Policy Team, Cambridge City Council, PO Box 700, Cambridge, CB1 0JH
- Or emailed to policysurveys@cambridge.gov.uk

Please submit your comments before **5.00pm on 30th September 2013**

Any representations submitted in relation to the consultation may also be accompanied by a request to be notified at a specified address of the submission of the draft Local Plan to the Secretary of State for independent examination under

²⁰ The venue was changed to Histon and Impington Recreation Ground after the notice was issued. The change of venue was publicised on the councils' websites and a notice was placed outside the village college.

section 20 of the Planning and Compulsory Purchase Act 2004; of the publication of the recommendations of the person appointed to carry out that public examination; and of the adoption of the Local Plan.

For further information, please contact the Planning Policy team as follows:

- Tel: 01223 457000
- Email: policysurveys@cambridge.gov.uk

Patsy Dell
Head of Planning
Cambridge City Council

Date of Notice: 19th July 2013

**APPENDIX 8: LETTER FROM NATURAL ENGLAND RE: APPROPRIATE
ASSESSMENT SCREENING OPINION**

Date: 18 July 2013
Our ref: 88651



Frances Schulz
Environment Planning Policy Officer
Cambridge City Council,
PO Box 700,
Cambridge
CB1 0JH

Consultation Service
Hornbeam House
Electra Way
Crewe Business Park
Crewe
CW1 6GJ
T: 0300 060 3900

By Email

Dear Frances

Cambridge City Council Draft Local Plan 2014 Habitats Regulations Assessment Screening Report

Thank you for consulting Natural England on the above document in your e-mail of 7th May 2013.

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

We are satisfied that the HRA Screening Report provides a comprehensive assessment of the potential impacts of the Cambridge City Council Draft Local Plan 2014 on European sites and that this has been undertaken in accordance with the requirements of the Conservation of Habitats and Species Regulations 2010. We agree with the conclusion of the report that the Local Plan is unlikely to have a significant effect on these sites and that detailed Appropriate Assessment is therefore not required.

We will be happy to review and comment in more detail on the HRA screening report as part of the formal consultation process; however, I hope these comments are helpful in the interim.

For any correspondence or queries relating to this consultation only, please contact Janet Nuttall using the details given below. For all other correspondence, including in relation to forward planning consultations, please contact the address above or email consultations@naturalengland.org.uk.

Yours sincerely,

Janet Nuttall
Land Use Operations
Tel: 0300 060 1239
Email: janet.nuttall@naturalengland.org.uk