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CAMBRIDGE LOCAL PLAN SA ADOPTION STATEMENT

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1. INTRODUCTION

This Sustainability Appraisal (SA) Statement forms the final output from the SA of the Cambridge Local Plan. The Cambridge Local Plan has been subject to an integrated SA and Strategic Environmental Assessment (SEA) (hereafter referred to as SA) in line with the requirements of [Statutory Instrument 2004 No. 1633: The Environmental Assessment of Plans and Programmes Regulations 2004](#).

The Cambridge Local Plan was adopted on 18 October 2018 and can be found here [\[insert hyperlink\]](#). The Local Plan as adopted, and a copy of this statement may be viewed, without charge at Cambridge City Council, Mandela House, 4 Regent Street, Cambridge CB2 1BY, from 9am to 5.15pm Monday to Friday.

Under the terms of Section 16(4) of the regulations quoted above, when a plan is adopted, a statement must be produced summarising:

- How environmental / sustainability considerations have been integrated into the plan (See Chapter 2);
- How the SA report has been taken into account (See Chapter 3);
- How opinions expressed in response to consultation on the SA report have been taken into account (See Chapter 4);
- How the Local Authority made the relevant documents available (See Chapter 5);
- The reasons for choosing the plan as adopted, in the light of the other reasonable alternative options dealt with (See Chapter 6); and
- The measures that are to be taken to monitor the significant sustainability effects of the implementation of the plan or programme (See Chapter 7).

2. HOW ENVIRONMENTAL / SUSTAINABILITY CONSIDERATIONS HAVE BEEN INTEGRATED INTO THE PLAN

The Local Plan sets out clearly that it is about ensuring development is taken forward in a sensitive and sustainable manner. This is built into the vision of the Local Plan and also into the 15 strategic objectives. Examples of the strategic objectives include:

- Objective 1: contribute to the vision of Cambridge as an environmentally sustainable city, where it is easy for people to make a transition to a low carbon lifestyle.
- Objective 9: assist the creation and maintenance of inclusive, environmentally sustainable communities;
- Objective 10: 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, while maintaining the quality of life and place that contribute to economic success; and
- Objective 12: 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.

The policies and proposals of the Plan have been formulated to advance these strategic objectives, and to secure sustainable development through the implementation of the Plan.

In addition, an independent check of the Local Plan has occurred through the SA, with SA being prepared at every stage of the plan (please see Table 2.1 for details of the reports that have been produced). This includes testing of reasonable alternatives. The spatial strategy has also been extensively tested most recently in the [Sustainability Appraisal Addendum Report \(November 2015\)](#) ([Revised March 2016](#)) and has been shown to be the most sustainable approach.

Table 2.1: Local Plan SA documents
SA Scoping
Cambridge Local Plan Sustainability Appraisal Scoping Report (URS Limited, June 2012) (Ref: RD/LP/210)
SA of Issues and Options 1
Cambridge Local Plan Interim SA of the Issues and Options Report (URS Limited, May 2012) (Ref: RD/LP/220)
SA of Issues and Options 2
Issues and Options 2: Part 1 Interim Sustainability Appraisal , (includes SA of the Development Strategy and sites on the edge of Cambridge). Carried out by officers from Cambridge City Council and South Cambridgeshire District Council (January 2013) (Ref: RD/LP/160)
Interim SA Report 2. Issues and Options 2 Part 2 Site Options (URS Limited, January 2013) (Ref: RD/LP/280)
SA of Draft Local Plans

Table 2.1: Local Plan SA documents
<p>Sustainability Appraisal of the Cambridge Local Plan 2014 – Proposed Submission (URS Limited, July 2013) Non-technical summary (Ref: RD/LP/290, RD/LP/300)</p> <p>Sustainability Appraisal of the Cambridge Local Plan 2014. Final Appraisal for Submission to the Secretary of State (March 2014). Please note that this is the statutory SA report as required by <i>Statutory Instrument 2004 No. 1633: The Environmental Assessment of Plans and Programmes Regulations 2004</i>. (Ref: RD/Sub/C/030 – Part 1 and RD/Sub/C/040 – Part 2).</p>
<p>Further Joint Sustainability Appraisal of the Development Strategy. Carried out by officers from Cambridge City Council and South Cambridgeshire District Council and reviewed by independent consultants ENVIRON, contained within the report "Reviewing the Sustainable Development Strategy for the Cambridge Area (May 2013). (Ref: RD/LP/180)</p>
<p>Sustainability Appraisal Addendum</p>
<p>Sustainability Appraisal Addendum Report (November 2015) (Revised March 2016) (RD/MC/021) Non-technical Summary; Main Report; Annex 1 – Part 1; Annex 1 – Part 2; Annex 1 – Part 3; Annex 1 – Part 4; Annex 1 – Part 5; Annex 1 – Part 6; Annex 1 – Part 7; Annex 1 – Part 8; Annex 1 – Part 9; Annex 2)</p>
<p>Further Proposed Modifications SA screening</p>
<p>Proposed Modifications to the Cambridge Local Plan – Sustainability Appraisal Screening (January 2017). (RD/CFM/020)¹</p>
<p>Sustainability Appraisal of Main Modifications</p>
<p>South Cambridgeshire and Cambridge Local Plans: Sustainability Appraisal of Main Modifications (December, 2017) (RD/MM/020).</p>

¹ Please note that these modifications were not subject to consultation, and the modifications that the Local Plan Inspectors considered to be necessary for soundness were included in the Main Modifications Consultation.

3. HOW THE SA REPORT HAS BEEN TAKEN INTO ACCOUNT

The SEA regulations require that during plan preparation an assessment is carried out on a draft version and a statutory report (called an SA report in England) is produced and consulted on. To comply with these regulations a SA report was produced alongside the production and publication of the Submission Local Plan. Please see [Sustainability Appraisal of the Cambridge Local Plan 2014. Final Appraisal for Submission to the Secretary of State \(March 2014\) \(Ref: RD/Sub/C/030 – Part 1 and RD/Sub/C/040 – Part 2\)](#) for further details. Section 4.6 contains the full assessment of the Draft Plan. The SA report was taken into account alongside the submitted Local Plan for the purposes of the assessment of the soundness of the Local Plan through the independent examination process.

The assessment of the Submission Local Plan found that the Local Plan would have no significant negative effects on sustainability.² It should be noted that at the Submission stage in the plan making process the Draft Local Plan had already taken account of recommendations or issues identified through the appraisal at earlier stages in the SA process when the issues and options stages were assessed and during the assessment of site options. Therefore, the Submission Local Plan performed well because sustainability issues had already been integrated into the Local Plan at earlier stages. This result has shown that the SA process worked in the way it is designed to work and that the negative issues were designed out of the Local Plan before the Submission Local Plan was published. Despite the fact that the SA did not find any significant negative effects, the SA report did make some recommendations regarding how the plan could be improved and these recommendations have influenced the plan in various ways. These are shown on Table 4 in the above linked document.

Three sets of modifications were also made to the Local Plan between the Submission Local Plan and the adopted Local Plan. However, the SA undertaken at each stage of the modification process also found that the Local Plan would not have significant adverse effects.

² Please note that this adoption statement focuses on the significant effects as these are specified in the SEA regulations

4. HOW OPINIONS EXPRESSED IN RESPONSE TO CONSULTATION ON THE SA REPORT HAVE BEEN TAKEN INTO ACCOUNT

4.1 Introduction

Consultation is an essential part of the plan making and SA processes. This section of the report summarises the statutory consultations undertaken on the SA and outlines how consultation has contributed to the development of the final Local Plan and SA.

The SEA regulations set out two stages where consultation should be undertaken (statutory consultation):

- Consultation on the scope and level of detail of the SA - scoping (Regulation 12(5) and (6)); and
- At the draft plan stage when the SA report is published (Regulation 13).

The results of these consultations are summarised below. Please note that the Council undertook consultations on all stages of the SA, and took account of representations at each stage.

The SEA regulations also require this statement to address how any trans-boundary consultations with other Member States has taken place. Please note that no trans-boundary consultations with other Member States were deemed necessary for this process.

4.2 Regulation 12 consultation – comments received about scoping

The scoping report was made available for a five-week period of consultation between 17 February and 26 March 2012. Consultation took place with Cambridgeshire County Council, South Cambridgeshire District Council, Cambridge City Ward Councillors and the statutory SA consultees (Natural England; English Heritage; and the Environment Agency).

Responses were received from Natural England, the Environment Agency, English Heritage and a local councillor. Responses were submitted related to the integration of SA and Habitats Regulations Assessment (HRA); inter-relationship between sustainability themes; the protection and enhancement of soils and agricultural land; consideration of Natural England's standards for accessible natural greenspace (ANGSt); local improvements to watercourse/ Green Infrastructure; the importance of water resources and flooding; the importance of localised renewable energy generation; the role of the Green Belt in preserving the special character of historic towns; the impact of tall buildings and the importance of retail diversity on Mill Road. A number of changes were made to the Scoping Report in response to these views. Table 3.6 in [Sustainability Appraisal of the Cambridge Local Plan 2014. Final Appraisal for Submission to the Secretary of State \(March 2014\) \(Ref: RD/Sub/C/030 – Part 1 and RD/Sub/C/040 – Part 2\)](#) sets out the comments received and, where appropriate, any changes that were made to the Scoping Report as a result.

4.3 Regulation 13 consultation - comments received about the Draft Local Plan and SA report

The Statement of Consultation outlines the comments that were received on the Draft Local Plan and the SA report. This can be found here: [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 \(March 2014\)](#). Comments were submitted on how much development was needed and where/when and many comments on strategic sites

were submitted (both in support and in objection). Many respondents put forward alternative sites to be considered.

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 SA 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 SA 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 SA but queried some of the detailed elements of the report. 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. Please see Section 5.8 and Table 6-13 of [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 \(March 2014\)](#) (**Ref: RD/SUB/080**) for further details.

4.4 Additional consultations

Consultations were also carried out at the Proposed Modifications stage and the Main Modifications stage. Consultation was carried out on the Local Plan (modifications) and also the SA work carried out on the modifications. A summary of the responses received, and subsequent action taken by the Councils is available in the reports below:

[Cambridge Local Plan South Cambridgeshire Local Plan Proposed Modifications – Report on Consultation, March 2016](#) (**Ref: RD/MC/120**).

[Cambridge Local Plan and South Cambridgeshire Local Plan Statement of Consultation to the Main Modifications Consultation, March 2018](#).

4.4.1 Proposed Modifications

At the Proposed Modifications stage a total of 892 representations were received to the Proposed Modifications joint consultation from a range of stakeholders. A further 143 representations were received to the accompanying SA Addendum.

The Councils made a limited number of changes to the Proposed Modifications as a result of the consultation. Some of the main changes are shown below:

- Additional text relating to the Development Strategy and the further work undertaken;
- New modification to include Newbury Farm (0.9ha) within the GB2 allocation;
- Correction to the housing number relating to the total housing provision in the Cambridge urban area to read 6828 not 6282;
- Additional text relating to listed buildings and the application of Policy 27 (Sustainable Design and Construction) in order to ensure no harm to heritage assets; and
- Additional text relating to vehicular access and masterplanning of land North of Cherry Hinton.

With regard to the SA Addendum ("SAA") the main issues raised in the consultation are shown below:

- Natural England and Historic England endorse approach to SA;
- SAA relies on the Councils' other evidence base documents which are flawed;

- Should have used more quantitative data;
- Every policy in both plans should be jointly assessed using the new joint SA framework;
- Site packages considered were set up to favour packages without edge of Cambridge Green Belt sites. Packages do not identify specific edge of Cambridge sites, or site North of Cambourne;
- SAA seeks to justify the existing strategy;
- Plans don't achieve the 'right balance' across the development hierarchy;
- Unjustified weighting of Green Belt compared to other sustainability issues;
- SAA fails to sufficiently recognise the benefits of village growth;
- Detailed criticisms of individual site criteria scores; and
- Site by site queries regarding potential mitigation measures.

In the main the Councils did not feel that changes were appropriate to the SAA report based on the consultation comments made. Some minor changes were made to the SAA and these are set out in Appendix 10 of that report.

4.4.2 Main Modifications

In total there were 261 representations received on the Main Modifications and 2 representations received on the SA for the Cambridge Local Plan.

A high-level summary of the main modifications consultation representations is shown in paragraphs 4.2-4.14 in [Cambridge Local Plan and South Cambridgeshire Local Plan Statement of Consultation to the Main Modifications Consultation, March 2018](#). These include comments on the usefulness of an early review of the Local Plan; concerns over the proposed modifications to the key employment sites; and concerns over the removal of small sites between 2 and 9 units contributing towards affordable housing provision.

With regard to the SA two representations were received to the Sustainability Appraisal in relation to the Cambridge Local Plan:

- Support from Natural England that the appraisal accords with requirements of regulations.
- Objection that the sustainability appraisal process did not consider reasonable alternatives to the joint housing trajectory, which is a breach of the SEA Regulations.

The representations relating to the Main Modifications and the Sustainability Appraisal have been submitted to the Inspectors undertaking the examination. The Inspectors considered all the comments received and have determined that the Local Plan is sound (subject to main modifications set out in their final report).

5. HOW THE LOCAL AUTHORITY MADE THE RELEVANT DOCUMENTS AVAILABLE

The SA statement should specify how the Council acted in accordance with the following regulation:

13(4); The responsible authority shall keep a copy of the relevant documents available at its principal office for inspection by the public at all reasonable times and free of charge.

In accordance with the council's Consultation and Community Engagement Strategy, consultation arrangements for the Draft Local Plan and SA report included making all documents available on the council's website and in the Customer Service Centre including a small exhibition. Libraries also received hard copies of the documents. No charge was made to view any of the documents.

6. THE REASONS FOR CHOOSING THE PLAN OR PROGRAMME AS ADOPTED, IN THE LIGHT OF THE OTHER REASONABLE ALTERNATIVE OPTIONS DEALT WITH

6.1 Introduction

The Local Plan has been through a significant process of identifying and testing potential alternatives and this is explained in detail in Sections 4.2-4.4 of the [Sustainability Appraisal of the Cambridge Local Plan 2014. Final Appraisal for Submission to the Secretary of State \(March 2014\)](#) (Ref: **RD/Sub/C/030 – Part 1 and RD/Sub/C/040 – Part 2**).

Cambridge City Council has identified several levels of alternatives from strategic development strategies, policy approaches, through to site allocations. In particular, strategic alternatives relating to development on the edge of Cambridge were identified and considered in partnership with South Cambridgeshire District Council.

6.2 The reasons for choosing the Local Plan as adopted

The reasons for selecting the Sustainable Development Strategy for Cambridge and South Cambridgeshire is set out below. Please also note that the reasons for selecting the Local Plan for each issue considered are set out in Section 4.5 of the [Sustainability Appraisal of the Cambridge Local Plan 2014. Final Appraisal for Submission to the Secretary of State \(March 2014\)](#) (Ref: **RD/Sub/C/030 – Part 1 and RD/Sub/C/040 – Part 2**). The above report sets out 43 tables, each of which tells a 'story', for a given planning issue, about the consideration of alternatives that has preceded the development of the preferred approach.

6.3 The reasons for selecting the Sustainable Development Strategy

The selected Sustainable Development Strategy being taken forward by both authorities follows the sequence of:

1. Development within the existing urban area of Cambridge;
2. Development within the defined fringe sites on the edge of Cambridge;
3. Development within six small-scale Green Belt sites proposed to be released from the inner Green Belt boundary;
4. Development within existing and newly identified new settlement locations at Cambourne, Northstowe, Bourn Airfield and Waterbeach; and
5. Development in identified villages.

This was selected after a comprehensive process of testing. Through the first Issues and Options consultations in 2012, the Councils considered and consulted on a number of development strategy options. Cambridge considered whether growth strategies should focus on the urban area only, or whether additional growth should take place in the Green Belt on the edge of the City (see **RD/LP/240 Cambridge Local Plan – Towards 2031: Issues and Options Report**, 2012). South Cambridgeshire sought views on whether growth should focus on edge of Cambridge, one or more new settlements, better served villages, or a combination of these (see **RD/LP/030 South Cambridgeshire District Council Issues and Options Report**, July 2012).

At the second issues and options stage in 2013, the Councils jointly 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 (see [RD/LP/150 Cambridge City Council and South Cambridgeshire District Council - Issues and Options 2, Part 1 – Joint Consultation on Development Strategy and Site Options on the Edge of Cambridge](#), January 2013).

Building on the SAs supporting each of the Issues and Options consultations, a joint SA was carried out of the sustainability implications of focusing on different stages of the development sequence (Cambridge Urban Area, Edge of Cambridge, New Settlements, better served villages, and, although not part of the development sequence, for comparison the less sustainable villages), to provide an overview of the development strategy option available to the Councils, taking on board issues identified during the SA and plan making process (see [RD/LP/180 Cambridge Local Plan 2014: Reviewing the Development Strategy for the Cambridge Area: Joint Sustainability Appraisal](#), 2013). Appendix D of this review document, which is the joint SA of the development strategy, notes that the work on assessing this Strategy has been undertaken in light of the SA topics/objectives/issues identified through SA scoping by the two Councils.

A further assessment of the development strategy was undertaken in 2015/2016 (see [RD/MC/021 Sustainability Appraisal Addendum Report \(November 2015\) \(Revised March 2016\)](#)) and the selected strategy was again shown to be the most sustainable approach.

Section 9.4 of the above report sets out the Council's reason for the approach. The non-technical summary document included a summary of these reasons:

The Councils recognise the merits of land on the edge of Cambridge in accessibility terms and the transport evidence confirms that situation, although it makes clear that major new development on the edge of Cambridge on congested radial routes have their own transport issues and are not necessarily cheap to deliver. The independent Green Belt evidence supports the findings of the Councils' own evidence that the release of land on the edge of Cambridge can be expected to compromise substantially the purposes of the Cambridge Green Belt, with two exceptions...

The evidence also looks at the potential to deliver sustainable new settlements, as an alternative to sites on the edge of Cambridge. They can provide viable and deliverable developments, that will be able to contribute to strategic off site infrastructure and provide high quality public transport links to Cambridge, that will attract significant levels of patronage and also provide wider benefits to existing communities. The City Deal is a significant opportunity to deliver sustainable transport to serve the wider area and with its focus on supporting the delivery of the development strategy is an important fund intended to assist with any funding shortfalls that might arise.

Having weighed all those factors, and considering the results of the Sustainability Appraisal Addendum, the Councils maintain their view that the development strategy in the submitted plans, with limited modifications, provides the right balance for this plan period and will provide a range of deliverable sites for the plan period and beyond, and that sustainability will be secured.

Section 9.4 referred to above summarised that the Preferred Strategy in the local plans:

- Maximises development within the urban area of Cambridge focusing on previously developed land;
- Includes the existing major developments on the edge of Cambridge identified in the adopted plans through previous Green Belt releases;
- Releases limited land for development on the edge of Cambridge weighing in each case the sustainability merits of such locations with the significance of harm to the purposes of the Cambridge Green Belt;
- Focuses growth at new settlements on two key strategic growth corridors, supported by transport improvements to achieve sustainable high quality public transport and other

infrastructure such as education, with potential to support longer term sustainable growth outside the Green Belt;

- Continues to limit the amount of new development in villages whilst providing for new development focused at the more sustainable villages to provide some flexibility to meet local needs supports the recycling of land at villages and schemes to meet local needs, with the scale of schemes guided by the rural settlement hierarchy.

7. THE MEASURES THAT ARE TO BE TAKEN TO MONITOR THE SIGNIFICANT SUSTAINABILITY EFFECTS OF THE IMPLEMENTATION OF THE PLAN OR PROGRAMME

The SEA Regulations (Regulation 17) require the significant environmental effects of plans and programmes to be monitored. The SA found that the Local Plan will not have any significant negative effects. Therefore, the monitoring programme should focus on identifying whether the plan has any unforeseen adverse effects.

The Local Plan itself includes a comprehensive monitoring programme which is focused on the achievement of the plan's objectives, which also closely reflect the sustainability objectives. This monitoring programme can be found in Appendix M of the adopted Local Plan.

The Local Plan monitoring programme will help to highlight whether the plan has any unforeseen effects on sustainability through measuring whether targets have been met. Each target also has a trigger point identified that will instigate a review of the policy and the implementation of actions to remediate the problem. Monitoring of the Local Plan will be undertaken on an annual basis and published on the Council's website³. Due to the comprehensive nature of the Local Plan monitoring programme it has not been deemed necessary to have a separate monitoring regime for the SA.

³ <https://www.cambridge.gov.uk/content/annual-monitoring-reports>