



# Public Document Pack

## Cambridge City Council

### ENVIRONMENT SCRUTINY COMMITTEE

**To: Scrutiny Committee Members:** Kightley (Chair), Saunders (Vice-Chair), Blencowe, Gawthrope, O'Reilly, Reid, Roberts and Tunnacliffe

**Alternates:** Councillors Ashton

**Executive Councillor for Environmental and Waste Services:** Councillor Swanson

**Executive Councillor for Planning and Climate Change:** Councillor Ward

**Executive Councillor for Public Places:** Councillor Reiner

*Despatched: Monday, 23 December 2013*

**Date:** Tuesday, 14 January 2014

**Time:** 4.00 pm

**Venue:** Committee Room 1 & 2 - Guildhall

**Contact:** James Goddard **Direct Dial:** 01223 457013

### AGENDA

#### 21 CAMBRIDGE LOCAL PLAN 2014 (Pages 5 - 222)

This item will not be considered until at least 6.30pm.

The Cambridge Local Plan Appendix documents are too large to attach to the agenda in hard copy format. All documents are published on the Council's website:

- i. Main report and Appendices A & C are attached to the agenda document.
- ii. Appendix B is accessible via the following hyperlink (**please copy all lines as the address is split over several**):

Appendix B: Schedule of Proposed Changes

[https://www.cambridge.gov.uk/public/ldf/draft\\_submission/Schedule/Appendix%20B%20Schedule%20of%20Proposed%20Changes%20FINAL%20for%20ESC.pdf](https://www.cambridge.gov.uk/public/ldf/draft_submission/Schedule/Appendix%20B%20Schedule%20of%20Proposed%20Changes%20FINAL%20for%20ESC.pdf) (Pages 5 - 222)

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To: Executive Councillor for Planning and Climate Change: Councillor Tim Ward  
Report by: Head of Planning Services  
Relevant scrutiny committee: Environment Scrutiny Committee 14/01/2014  
Full Council 13/02/2014

Wards affected: All Wards

## CAMBRIDGE LOCAL PLAN 2014 – SUBMISSION STAGE

### Key Decision

#### 1. Executive summary

NOTE: Members are asked to bring their copy of the Cambridge Local Plan 2014: Proposed Submission (July 2013) to the meeting.

- 1.1 This report concerns the Cambridge Local Plan 2014: Submission Stage.
- 1.2 The council's Development Plan Scrutiny Sub-Committee has over the last three years considered and commented on the evidence base and individual draft sections of the new local plan, prior to it being approved by Full Council for publication for the purposes of public consultation on 27 June 2013. That 'draft plan' is known as the 'Proposed Submission' plan.
- 1.3 Consultation on that plan has taken place (19 July – 30 September 2013) and 2,995 representations have been received and considered by officers. The council now has to decide whether to continue to progress with the plan, with or without amendments. If so, and if the amendments were not too extensive, the council could agree to formally 'submit' the plan to government for independent examination. If the amendments were extensive (e.g. significant rewording of policies, new sites added or existing ones deleted), then the council may decide to re-consult before 'submitting' the plan for examination.

1.4 The purpose of the report is to present:

- A summary of the Key Issues raised during the consultation on the Cambridge Local Plan 2014: Proposed Submission document – see Appendix A;
- A Schedule of ‘Proposed Changes’ to the plan – see Appendix B;
- An evidence report in respect of ‘Duty to Cooperate’ – see Appendix C.

1.5 This report also sets out the options available to the council in order to progress the plan through its final preparation stages.

1.6 For this committee, the key recommendation is that the plan should make its way to Full Council on 13 February 2014.

1.7 If Full Council approves the plan, it will then be submitted to the Secretary of State for public examination by an independent planning inspector.

## **2. Recommendations**

2.1 Environment Scrutiny Committee is recommended to support the following recommendations to the Executive Councillor for Planning and Climate Change and Full Council:

- a. that the Cambridge Local Plan 2014: Proposed Submission document and Proposed Policies Map (as approved by Full Council on 27 June 2013) be ‘submitted’ for examination in accordance with Regulation 22 of the Town and Country Planning (Local Planning) (England) Regulations 2012, together with the sustainability appraisal and associated evidence material in support of the plan, and including the Key Issues (Appendix A) and Schedule of Proposed Changes (Appendix B);
- b. that the Duty to Cooperate Report (Appendix C), be agreed and submitted as part of the evidence base for the Local Plan.
- c. that, in the interests of expediency, delegated authority be given to the Head of Planning Services to undertake appropriate negotiations and make further minor additions to the Schedule of Proposed Changes during the examination of the local plan (i.e. post ‘submission’) if in the opinion of the Head of Planning Services it is appropriate and necessary to do so to facilitate the

smooth running of the plan through the examination period, (except where changes would be of such significance as to substantially alter the meaning of a policy or allocation). The exercise of this delegation to be reported back to Development Plan Scrutiny Sub-Committee through the course of the examination process.

- d. that the Head of Planning Services is authorised to prepare and submit reports, proofs of evidence, technical papers, statements of common ground and other such documents required in the presentation of the local plan through the examination process and reflecting the council's agreed position on these matters and to take such other steps as are conducive or incidental to the submission and examination of the local plan.
- e. that any changes to Appendices A, B and/or C required by Environment Scrutiny Committee be agreed by the Chair and Spokes of Environment Scrutiny Committee and the Executive Councillor for Planning and Climate Change.

### **3. Introduction**

- 3.1 Members will be aware that the current Cambridge Local Plan was adopted in July 2006 and runs to 2016. There is an urgent need to replace this plan with a new one that:
  - makes provision for development over a longer time period (to 2031);
  - addresses all of the challenges currently facing Cambridge;
  - responds to the new national policy context established by the National Planning Policy Framework (NPPF) (published in March 2012); and
  - accords with the requirements of the Planning and Compulsory Purchase Act 2004, the Localism Act 2011 and associated Regulations.
- 3.2 There has been a great deal of preparatory work for the new plan, including consultations on Issues and Options (June – July 2012) and on Issues and Options 2 (January – February 2013), and the collection of evidence and the undertaking of specialist studies to justify and underpin the preparation of policies. All of the 18,000 representations made during those two periods of consultation were

taken into account and greatly assisted in preparing the 'draft plan' which was agreed by Development Plan Scrutiny Sub-Committee on 29 May 2013, and subsequently agreed at Environment Scrutiny Committee on 11 June 2013 and Full Council on 27 June 2013.

3.3 This 'draft plan' was also consulted upon for a period of 10 weeks between 19 July and 30 September 2013. In plan-making terms, this consultation stage was known as the 'Proposed Submission' stage. This means the council thought, subject to the outcome of the consultation, that the plan was 'sound' and should be independently tested in its present form through the examination process prior to adoption. The council also believed that it had undertaken properly all the due legal requirements for plan making, such as:

1. Whether the plan has been prepared in accordance with the **Local Development Scheme** and in compliance with the **Statement of Community Involvement** [The Planning and Compulsory Purchase Act 2004 (the Act) sections 19(1) and 19(3) respectively].
2. Whether the plan has had regard to **policies developed by a local transport authority** in accordance with section 108 of the [Transport Act 2000](#) [Reg 10(a)].
3. Whether the plan pursues the objectives of **preventing major accidents and limiting the consequences of accidents** by pursuing those objectives through the controls described in Article 12 of [Council Directive 96/82/EC](#) [The Seveso directive] [Reg 10 (b) (c)].
4. Whether the plan has been subject to a **strategic environment assessment**, and where required an appropriate assessment of impact on any sites falling under the EU Habitat (and Birds) directive [The Act Section 19(5), [EU Directive 2001/42/EC](#), [The Environmental Assessment of Plans and Programmes Regulations 2004](#), [EU Habitats and Birds Directives Directive 92/43/EEC](#), [The Conservation of Habitats and Species Regulations 2010](#)].
5. Whether the plan is compatible with the requirements of the [EU Water Framework Directive](#) and any River Basin Management Plans prepared under that directive [[Directive 2000/60/EC](#)].
6. Whether the plan has regard to the **National Waste Management Plan** [Reg 10(d) and [Waste \(England and Wales\) Regulations 2011](#)].



7. Whether the plan has regard to any **Sustainable Community Strategy (SCS)** for its area; [section 19(2)(f), section 4 of the [Local Government Act 2000](#)].
8. Whether the plan meets the **procedural requirements involving publicity and availability of the development plan document and related documents**; [The Act Section 20(3), prescribed documents Reg 17 and Reg 22, Consultation Reg 18, Submission Reg 22].
10. Whether the plan meets the **Duty to Cooperate** [The Act Section 33A, Reg 4].

3.4 The council also believed that the plan met the soundness tests as set out in the NPPF (paragraph 182):

“A local planning authority should submit a plan for examination which it considers is “sound” – namely that it is:

- **Positively prepared** – the plan should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development;
- **Justified** – the plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence;
- **Effective** – the plan should be deliverable over its period and based on effective joint working on cross-boundary strategic priorities; and
- **Consistent with national policy** – the plan should enable the delivery of sustainable development in accordance with the policies in the Framework.”

3.5 However, prior to submitting the plan in the form agreed by Full Council on 27 June 2013, the council’s constitution requires the outcome of the consultation which took place between 19 July and 30 September 2013 to be presented to it and to decide whether it still felt the plan contained the appropriate strategy and was sound and fit for purpose to meet Cambridge’s needs.

### **Options Available to the Council**

3.6 Before turning to the consultation findings and a summary of the Key Issues raised during the recent consultation, it is perhaps more

important to firstly understand the options available to the council in terms of how it proceeds.

- 3.7 As was made clear at meetings of Development Plan Scrutiny Sub-Committee, Environment Scrutiny Committee and Full Council in 2013, the plan consulted upon in July to September 2013 was a 'Proposed Submission' plan. The most fundamental point to understand in this respect is that the council is not lawfully permitted to make changes to the plan agreed on 27 June 2013, prior to submitting the plan for independent examination. If it decides it wants to do that, a new 'submission plan' would have to be prepared and re-consulted upon before it could be submitted.
- 3.8 The council therefore now has four options at its disposal, set out below, with each option explained in detail thereafter:
- Submit the Cambridge Local Plan 2014 as agreed at Full Council on 27 June 2013, together with associated evidence material and all duly lodged representations made during the period of 19 July to 30 September 2013; or
  - Submit the Cambridge Local Plan 2014 as above, but also submit a Schedule of minor Proposed Changes to the plan; or
  - To decide not to submit the Cambridge Local Plan 2014, and instead make changes to the plan, consult on those changes, then submit the amended plan; or
  - Abandon the Cambridge Local Plan 2014 in its current form, and commence preparation of a completely new one.

**Option 1: Submit the Plan as already agreed (without any changes)**

- 3.9 This option means that, having considered the issues raised during the recent consultation, the council decides that the plan it agreed on 29 May, 11 and 27 June 2013 remains fit for purpose and does not require any amendments. The plan would then be submitted to the Secretary of State, defended at a public examination and adopted in the form as submitted unless the Planning Inspector who conducts the subsequent public examination into the plan recommends otherwise.
- 3.10 In practice, the documents are submitted to the Government's Planning Inspectorate, acting on behalf of the Secretary of State. A planning inspector will be appointed to conduct a public examination into the plan, and it is the job of the inspector to take all of the representations into account during the course of the examination.

- 3.11 This inspector will receive and debate evidence from all relevant parties (including, of course, the council) and a major part of the examination will be a series of hearing sessions in public. These hearing sessions are likely to be in the summer of 2014. The process will culminate in the production of the Inspector's Report in which he/she will say if the plan is or is not sound, and legally compliant, with recommended modifications if necessary to make it so.
- 3.12 South Cambridgeshire District Council undertook consultation on their South Cambridgeshire Local Plan: Proposed Submission document from 19 July to 14 October 2013. South Cambridgeshire District Council has received over 7,000 representations to this stage of consultation and officers are currently assessing their representations in detail. Assuming that South Cambridgeshire District Council submit their plan for examination next Spring, it is highly likely that a joint examination of the South Cambridgeshire Local Plan and the Cambridge Local Plan 2014 could take place, with the same Inspector examining and reporting on both plans. The Planning Inspectorate has indicated as much, though this depends whether the two plans are submitted for examination at broadly the same time. Should one be delayed for whatever reason, it is likely that the two plans will be independently examined. As there are joint issues for the councils, it is unlikely that an Inspector's report would be issued on a single plan in isolation.

**Option 2: Submit the Plan as already agreed, but also submit a Schedule of Proposed Changes**

- 3.13 If, having considered the issues raised during the recent consultation the council feels the plan as agreed on 27 June 2013 remains fit for purpose, but some minor changes could improve the plan's clarity, then it may follow the procedure set out in option 1 but also submit an additional Schedule of Proposed Changes.
- 3.14 A Schedule of Proposed Changes sets out changes the council would like to make to the plan, predominantly to address concerns raised during the consultation period. The council is not permitted to make these changes directly to the plan and then submit it (because it will then be submitting a plan for examination which has not been consulted upon – which would be unlawful). Instead, what the council is saying to the Inspector is that 'the plan agreed by Full Council on 27 June 2013 is the plan we wish to have examined, but the council thinks the plan can be improved by including the changes as listed in the Schedule of Proposed Changes.

3.15 As part of the examination process, the Inspector will consider these Proposed Changes, and may or may not agree to them. As long as the plan is found by the Inspector to be sound, any changes he/she considers are 'major' ones which he/she supports, will be subsequently recommended back to the council for inclusion in the final (adopted) version of the plan. Any 'major' changes that the Inspector rejects will mean the council will not be permitted to make such a change; and any 'minor' changes will be left to the council to decide whether to make such changes or not (i.e. the council has discretion to make as many 'minor' changes as it sees fit to the plan prior to adoption, though this is a somewhat grey area in case law and tends to be reserved for very minor changes covering typographical errors, tweaks to supporting text and the like. Amending a policy or an allocation is highly unlikely to be regarded as 'minor').

**Option 3: Do not Submit. Make amendments, consult, then Submit**

3.16 The council is likely to choose this option if it considers one of the following applies:

3.17 First, if the council wants to make a number of changes to the plan so that the plan it subsequently submits has all of the changes embedded within it. In this scenario, there would be no 'schedule of proposed changes' submitted, because such changes would have been made to the Local Plan already and then re-consulted upon for at least the statutory minimum 6 week consultation period.

3.18 Second, if the council wants to make a change(s) to the plan which are of such significance that they could not be dealt with as a minor change covered in the Schedule of Changes. An example of such a change would be the addition or deletion of a site allocation, or a complete re-write of one of the fundamental policies of the plan.

3.19 If the council decides to go down this 'extra consultation' route, then it would likely do so by consulting on an 'Addendum' to the Proposed Submission Plan i.e. the Addendum would identify the changes. If this option were agreed, any comments received on the Addendum would then be added to those comments received from 19 July to 30 September 2013.

3.20 Alternatively, if there are lots of changes of significance, it may be more sensible to effectively abandon the last consultation round and re-consult on a new 'Proposed Submission' plan. This would mean all objectors would have to re-submit their representations, even if the bit

of the plan they were commenting upon had not changed. This sub-option is somewhat messy and confusing for the public.

#### **Option 4: Abandon the Plan**

- 3.21 Finally, the council could decide, were it felt this was the appropriate approach, for whatever reason, to simply abandon the plan and start again. Clearly, this would have major implications for the city, as it would have an existing plan rapidly going out of date with no prospect of a new one being adopted for at least 3 years.

#### **4. Findings from Consultation on Proposed Submission Plan (Summer 2013)**

- 4.1 A broad range of issues from a wide audience were submitted to the council (701 respondents, 2,995 separate representations). On the whole, the nature of the representations received were not unexpected because many repeated concerns made at earlier consultation stages or were in objection to a proposed site allocation (or lack of allocation). The key messages raised were:

- Range of challenges to homes and jobs forecasts, to the forecast methodology, the proposed development strategy and sequence, objectively assessed housing (and affordable housing) and jobs needs;
- Challenges to the Sustainability Appraisal and Memorandum of Cooperation/Duty to Cooperate approach;
- Not enough land allocated for homes and jobs/too much land allocated for homes and jobs;
- Challenges to proposed sites sequence and allocation (by promoters of Barton Road, Fen Ditton, Waterbeach New Town, Cambridge South, Trumpington Meadows Sporting Village and Cambridge South East sites);
- Green Belt should be protected and sites GB1 – 4 should not be taken forward;
- Green Belt protection is excessive and has led to an unsustainable development strategy being proposed/ Green Belt assessments flawed;
- Major sites – Cambridge Northern Fringe East proposed Area Action Plan approach objected to, support for approach at land south of Coldham's Lane, issues raised regarding redevelopment of Howard Mallett Centre;
- Approach to planning for retail growth both criticised and supported, with public realm improvements especially in the historic core and Market Square supported;



- Retail growth should remain in the historic core rather than at the Grafton;
- Objections from Cambridgeshire County Council on failure to plan for secondary education and household waste recycling centre provision;
- More cycling provision.

4.2 However, through the consultation process, a number of useful suggestions were made, and officers believe minor amendments to the plan can and should be made to accommodate them (see Schedule of Proposed Changes). A number of representations and suggested changes were made by statutory consultees such as the Environment Agency, English Heritage, Natural England and Anglian Water.

4.3 Three petitions were received to the consultation. These petitions related to particular sites proposed for allocation within the plan:

1. Petition signed by 2,025 people opposing sites proposed for allocation, which would require the release of land from the Cambridge Green Belt (Sites GB1 – 4) on the basis of:
  - 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.
2. Petition signed by 130 people and a survey of 10 local residents which raised concerns about the development of Site R10: Mill Road Depot, particularly with regard to the density of development; the 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; access and congestion; and the need for building heights to be no higher than the existing skyline;
3. Petition signed by 527 people objecting to the allocation of Site R12: Ridgeons, 75 Cromwell Road, on the basis of density; the need for family housing for local people; the need for accessible green space; the need for a safe crossing of the railway and a request to change the site to mixed use.

4.4 The petitions with over 500 signatures can be presented to Full Council under the council's petitions scheme. Representations were also received to the consultation in relation to matters affecting the Petersfield area. The concerns raised by a large number of respondents related to:

- Provision of public open space in Petersfield, with particular reference to provision of the Howard Mallett Centre site for open space;
- The Howard Mallett Centre should be provided as a community, sports and leisure facility or it should be returned to public open space with the community facility replaced and relocated nearby;
- The Howard Mallett Centre must not be replaced with residential or office buildings;
- The Petersfield area has reached saturation point for student accommodation and housing in multiple occupation;
- No further Anglia Ruskin University development within Petersfield;
- Specifics should be committed to within the plan to require delivery of facilities by developers;
- The density of development proposed for Site R10 Mill Road Depot is inappropriate and should be halved; open space provision should be increased on the site; access should only be via Mill Road; community facilities should be specified and guaranteed; trees and the library should be retained; development should be car-free; garages to the south of Hooper Street should be retained; and cycle route should be incorporated.
- The proposals for Site R12 Ridgeons, 75 Cromwell Road, are inappropriate due to the proposed density; no provision for the elderly; insufficient provision of affordable or family housing; lack of public open space and inadequate access;
- There should be no more hotel development permitted in the area, due to negative impacts on car parking and poor design of the new hotels on Coldham's Lane/Newmarket Road;
- Need to clarify the requirements of Policy 22 on the Eastern Gate Opportunity Area and the Chisholm Trail;
- The city's infrastructure is not sufficient to accommodate the development.

4.5 The following paragraphs of this report address the level and type of representations to key sections of the plan.

4.6 The vision, strategic objectives and policies within Section Two: The Spatial Strategy (pages 11 to 37) of the plan received a wide range of representations. However, this section was the main focus of

representations from the development industry, particularly from those developers seeking large land allocations on the edge of Cambridge. Representations sought the allocation of land within the Cambridge Green Belt within Cambridge's administrative boundary for the following purposes:

- Commercial Estates Group proposed a site of 170 hectares to accommodate an additional 3,300 to 4,400 homes, 10 hectares of employment land, 60 hectare Country Park and other infrastructure on land between Worts' Causeway and Fulbourn Road (with some of the site within South Cambridgeshire);
- North Barton Road Landowners Group proposed a site of 108 hectares on land to the north of Barton Road, split approximately equally between Cambridge and South Cambridgeshire, for up to 1,476 new dwellings (including affordable and key worker housing); local centre; primary school; and substantial new green infrastructure;
- Pigeon Land proposed a site of 180 hectares on land south of Addenbrooke's Road and adjacent to the M11 (site split 80/20 between South Cambridgeshire and Cambridge) for over 40 hectares of B1 (b) research and development science park, 1,250 dwellings, retail and community facilities, primary school, open space and highway and supporting infrastructure;
- Turnstone Estates' Teardrop (approximately 1 hectare) site north of the A14 in Milton (Site lies predominantly in South Cambridgeshire) for housing and transport improvements;
- Grosvenor Developments/Wrenbridge Ltd (15 hectare site split 80/20 between South Cambridgeshire and Cambridge) proposed allocation of land west of Hauxton Road, Trumpington and at the Abbey Stadium, Newmarket Road (2.8 hectare site) for the delivery of a community football stadium, indoor and outdoor sports facilities and enabling residential development.

4.7 Representations were also received from those seeking allocation of land in South Cambridgeshire, namely Quy Estates and RLW Estates regarding their sites at Fen Ditton and Waterbeach respectively. Their proposals are as follows:

- Quy Estates proposed a site on both sides of Horningsea Road between Fen Ditton and the A14 for 450 – 500 dwellings (including 160 – 200 affordable units) on an approximately 25 hectare site with a landscaped buffer to the A14, and provision of open space;
- RLW Estates proposed an allocation of 577 hectares (inclusive of green infrastructure) for a new town at Waterbeach



comprising 9 – 10,000 homes, employment and education provision, transport and green infrastructure.

- 4.8 In seeking the allocation of large areas of land to be released from the Green Belt, these representations raised concerns about the development strategy for Cambridge and South Cambridgeshire and the objectively assessed needs for housing and employment set out in the plan. These site promoters consider that the figures that are being planned for too low, and believe more housing and employment should be provided. They also raised concerns about the deliverability of housing sites allocated in the draft plan.
- 4.9 Cambridgeshire County Council has objected to the plan in a number of areas, including the council's Policy 4: The Cambridge Green Belt, as they would wish to see provision of a household recycling centre serving the south of the city and a secondary school serving the east of the city. Cambridge City Council and South Cambridgeshire District Council have been involved in discussions with Cambridgeshire County Council about both education and waste provision over a number of years.
- 4.10 The policies in Section Three: City Centre, Areas of Major Change, Opportunity Areas and Site Specific Proposals (pages 41 to 97) of the plan were the subject of significant interest during the consultation. Policy 15: South of Coldham's Lane Area of Major Change was the subject of considerable support. Policy 22 on Eastern Gate Opportunity Area received a large number of objections, predominantly focussed on concerns about the Howard Mallett Centre, student accommodation, Anglia Ruskin University's expansion and hotel development. Policy 23: Mill Road Opportunity Area also received a number of representations raising concerns about proposed allocations such as sites R10 Mill Road Depot, R12 Ridgeons and R21 315 – 349 Mill Road and Brookfields; retail provision; impact on the conservation area and protected open space; transport and community infrastructure. Many people also responded to Policy 26: Site Specific Development Opportunities, which makes specific reference to the four sites allocated for release from the Cambridge Green Belt. The 94 objections and petition signed by 2,025 people expressed a wide range of concerns regarding the proposed allocations, including loss of Green Belt, biodiversity, infrastructure, access and the need to identify land other than Green Belt for development.
- 4.11 The policies in Section Four: Climate Change and Managing Resources (pages 101 to 129) of the plan were supported by many of the respondents, including statutory consultees. Although a few minor

changes are suggested by officers for textual clarity, the Environment Agency also suggested a number of changes to Policy 33: Contaminated Land in order to better protect groundwater. Rewording of the policy and its supporting text is included within Appendix B: Schedule of Changes.

- 4.12 In relation to the policies on climate change and managing resources, it should be noted that the Government's Housing Standards Review was announced in October 2012, with the aim of reducing the range of standards applied to new-build homes. Some of the housing standards that the review considers include the Code for Sustainable Homes, Secured by Design, Lifetime Homes, Standards and Quality in Development and the Homes and Communities Agency's Housing Quality Indicators. The review may impact upon the ability of local planning authorities to set higher standards for sustainability and housing design issues, such as internal and external space standards. Consultation on the Housing Standards Review took place during Summer 2013. Consultation responses to the review are currently being assessed by the Government. This council made a response to that consultation. There is currently no published timetable for changes to the standards regime. As such, it is considered appropriate to proceed with the policies on sustainability and housing design within Sections 4 and 6 of the Cambridge Local Plan 2014: Submission document for the time-being. It should be noted that the Inspector may need to have regard to the results of the Housing Standards Review and that proposed policies may therefore fall away or be amended.
- 4.13 Representations on Section Five: Supporting the Cambridge Economy (pages 133 to 144 of the plan) included responses to Policy 40: Development and expansion of business use raising concern about the council's calculation of employment land required in the plan. An alternative Employment Land Review was submitted to the consultation - this document suggests that the amount of employment land we should plan for is an additional 43.3 hectares rather than 7.4 hectares, as at present. A new business park to the south of the city is suggested to help meet this need. Other representations suggested that new buildings are designed flexibly and allowed to temporarily change use to provide small, low cost employment spaces that can easily change to something else if the business grows or fails. Some representations expressed concern over the move to restrict the change of use for all business uses in the city: it is argued that reducing flexibility will harm the ability of the economy to adapt to changes in circumstances, both on a micro and macro scale. A large number of representations to Policy 43: University Faculty Development raised concerns about the expansion of Anglia Ruskin

University and the number of students in the Petersfield area. Concern was also expressed about different treatment of language and specialist schools, when compared to other educational institutions, and that Policy 44: Specialist colleges and language schools did not allow for evolving ways of providing student accommodation.

- 4.14 The main focus of representations to Section Six: Maintaining a Balanced Supply of Housing (pages 147 to 167) of the plan related to Policy 45: Affordable housing and dwelling mix and Policy 46: Development of student housing. In respect of the affordable housing policy, a number of representations raised concerns about the viability of development within the city. Furthermore, a number of responses stated that the policy should be amended to ensure clarity of approach. As such, the policy has been redrafted in such a way that the content of the policy is not changed, but the information within it is more accessible. This can be found at pages 16 to 18 of Appendix B to this committee report. It should also be noted that the Government announced its intention in the Autumn Statement 2013 to consult on the possibility of introducing a national threshold of 10 units for affordable housing. If brought into force, this threshold would have implications for the council's affordable housing policy as drafted. As with the Housing Standards Review, the council is proposing to retain the current drafting until a decision has been reached by the Government on this matter.
- 4.15 Representations on Policy 46 in Section Six centred around the need for student housing. Whilst education providers were concerned that they should be able to provide additional student accommodation to meet their needs, without the proposed restrictions of the policy, a number of local residents raised concerns about the level of student housing in the city, the quality of that housing and the restrictions on its use, e.g. car parking. Additionally, Policy 48: Housing in Multiple Occupation was the subject of a number of representations relating to concerns about the difficulties of monitoring and controlling housing in multiple occupation and the need to limit this form of housing in some area of the city.
- 4.16 Policy 50: Residential space standards in Section Six also received representations on the impact of these standards on development viability, whilst some respondents wanted to see more demanding requirements for both internal and external spaces. Policies 50 and 51 could potentially be affected by the outcome of the Government's Housing Standards Review, as discussed in an earlier paragraph of this report.

- 4.17 A number of respondents made representations to Section Seven: Protecting and Enhancing the Character of Cambridge (pages 171 to 194) of the plan in relation to the quality of urban design in new developments and the need to preserve and enhance the city's important historic environment. Policy 60: Tall buildings and the skyline in Cambridge was the subject of objections on the basis that respondents were concerned about the height of buildings in the historic core in particular. Respondents, including English Heritage, objected from the point of view that the heights were too restrictive or not restrictive enough. Policy 61: Conservation and enhancement of Cambridge's historic environment was also objected to by some respondents on the basis of being unduly restrictive or not restrictive and detailed enough.
- 4.18 Within Section Seven. Policy 67: Protection of open space had a relatively high response rate, with respondents concerned about the need for more protection for sites and about the inflexibility of the policy in the light of the needs of educational institutions in the city. Minor amendments to Policy 68: Open space and recreation provision through new development and Appendix I: Open Space and Recreation Standards are recommended to allow flexibility within the council as to how we apply the open space standards for off-site provision of open space in the light of the threshold for pooling planning obligations introduced through the Community Infrastructure Levy Regulations (2010, as amended).
- 4.19 The two policies in Section Eight: Services and Local Facilities (pages 197 to 214 of the plan), which were subject to the highest level of interest during consultation, were policies 73: Community, sports and leisure facilities and 77: Development and expansion of hotels. Representations to policy 73 relate to the provision of a community stadium, with respondents both supporting and objecting to the provision of a site for a community stadium. In relation to policy 77, most of the objections are related to the recent provision of hotels in the Coldham's Lane and Newmarket Road area and concerns about levels of car parking and future hotel provision in this area.
- 4.20 Within Section Nine: Providing the infrastructure to support development (pages 217 to 231 of the plan), Policy 80: Supporting sustainable access to development received representations on the Chisholm Trail and the need for more radical measures to reduce car usage in the city, including provision for cyclists and public transport. Policy 85: Infrastructure delivery, planning obligations and the Community Infrastructure Levy was the subject of some concern, due to respondents' issues with infrastructure delivery for specific sites, including Site GB1 – 4, R10 Mill Road Depot and the Howard Mallett

Centre. Minor amendments to Policy 85 are recommended 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).

## **Appendices**

- 4.21 The majority of representations made on the appendices of the plan relate to Appendix B: Proposals Schedule and Appendix C: Designations Schedule. Representations to Appendix B included proposals for further allocation of land at the Triangle (Cambridge University Press) site (for employment/office use); the former Milton Road Primary School site on the corner of Milton Road and Gilbert Road (for aparthotel use); the Cambridge Tennis and Hockey Club and Emmanuel College Playing Fields sites (for residential use); Newnham College grounds (for college use).
- 4.22 Within Appendix B, the following proposed allocations were the subject of a large number of representations:
- GB1: Land north of Worts' Causeway;
  - GB2: Land south of Worts' Causeway;
  - GB3 and GB4: Fulbourn Road, west 1 and 2;
  - R10: Mill Road Depot;
  - R12: Ridgeons, 75 Cromwell Road.
- 4.23 Most of the representations made to Appendix C related to Protected Open Spaces, with many representations supporting the principle of Protected Open Space designation and specific designations. A large number of representations objected to the designation of St Matthew's Piece (Protected Open Space site P&G20) as they considered that the size of the Protected Open Space should be increased to encompass the Howard Mallett Centre (or to make it a community facility). A number of Colleges objected to the designation of their grounds as Protected Open Space, which in their view could impact on their potential scope for future development.

## **Sustainability Appraisal**

- 4.24 A Sustainability Appraisal of the Proposed Submission Local Plan was made available for consultation at the same time as the plan. 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. Officers are collating all of the individual elements of the Sustainability Appraisal, which have been carried out at each stage in the preparation of the Local Plan, into one final Sustainability Appraisal report for submission to the Secretary of State. None of the proposed changes to the plan are considered to affect the outcome of Sustainability Appraisal.

## **5. Key Issues Raised and the Schedule of Proposed Changes**

- 5.1 It is a regulatory requirement to publicise a summary of the Key Issues raised during a Proposed Submission consultation exercise such as the one undertaken between 19 July and 30 September 2013. This is attached at Appendix A.
- 5.2 This Key Issues report does not attempt to summarise every point made. It is simply a guide to highlight the most pertinent points made to the plan, sustainability appraisal and policies map. All representations received are available on the council's website at <http://cambridge.jdi-consult.net/ldf/>, and a summary of each representation received is available on the web at [https://www.cambridge.gov.uk/public/ldf/draft\\_submission/summaries/](https://www.cambridge.gov.uk/public/ldf/draft_submission/summaries/). Hard copies of the representation summaries are also available in the Members' room or by contacting the planning policy team. The Inspector must read all representations in full.
- 5.3 The principle of such a Schedule is discussed above. Attached at Appendix B is the draft Schedule of Proposed Changes, which also includes the reasoning behind each suggested change.
- 5.4 Having reviewed all the representations received and matters raised, officers consider that Option 2 represents the most appropriate way forward at this time. This is because it is considered that the plan as currently drafted still represents the appropriate strategy approach to meeting the city's needs now and in the future. Some changes could usefully be made to improve clarity, but such changes are not so substantial as to warrant full re-consultation (Option 3), nor so minor that they should, in effect, be ignored (Option 1).
- 5.5 The Proposed Changes are predominantly to address issues of clarity in policy or supporting text wording. No site is proposed to be deleted or amended, and no new site is proposed to be added.

- 5.6 Your officers are recommending that that plan that was agreed at Full Council on 27 June 2013 remains fit for purpose and 'sound' and should be submitted for examination, together with this Schedule of Proposed Changes which the Inspector will be asked to support.
- 5.7 Members are asked to support the Schedule of Proposed Changes.

### **Procedural Matters that will arise during Examination**

- 5.8 Members will need to be aware that the Schedule of Changes is likely to need to be added to throughout the examination period. This is because Inspectors like to come to agreement between parties on amendments to the plan, rather than imposing such changes on a council. Thus, if during the examination period it is becoming clear that the Inspector is not happy with an aspect of the plan, perhaps seeing merit in what an objector has said, then the Inspector urges all parties to come to some form of agreement on a change. This means the council has a degree of control over such a change (and, indeed, may sometimes welcome such a change) rather than wording being imposed upon us by the Inspector. The council does not have to agree to work with parties such on a change and could simply let the Inspector decide, but in the majority of cases it is best to be part of that process of negotiation.
- 5.9 What this means is that a degree of authority needs to be delegated to the Head of Planning Services to agree such additional Proposed Changes as they arise, as it is impractical for such changes to be agreed by committee in the usual way (Note: during the hearing sessions of the examination, changes are likely to be negotiated and added to the Schedule on a daily basis).
- 5.10 The recommendation in this report seeks such appropriate delegation, with reporting back on the exercise of such delegation through Development Plan Scrutiny Sub-Committee during the course of the examination.
- 5.11 Members should be aware that, ultimately, the actual schedule of changes to be made to the plan is (other than minor changes) completely at the discretion of the Inspector. The Inspector can accept or reject as many of the changes on the Schedule of Proposed Changes as he/she sees fit, as well as add any new ones. If major changes arise, it is likely that the Inspector will introduce a consultation period on all of the major changes that he/she has in mind towards the close of the examination period, before finalising his/her report, so that any comments on them can be taken into account.

- 5.12 Provided that the plan is found to be basically sound, the full, Inspector approved, list of changes will ultimately be passed back to the council for incorporation into the plan when it is adopted by the council, though at this stage the council must approve them all or none of them (and if the latter, the plan is effectively abandoned and not adopted).
- 5.13 Officers will also need to prepare a number of documents and technical papers which support the plan, such as the sustainability appraisal, Green Belt and sites documentation, in order to ensure that the story of the development of the plan is told as effectively as possible to the Inspector. This is re-presenting existing technical work for the purpose of clarity only, rather than commissioning new work to be undertaken.

## **6. Duty to Cooperate**

- 6.1 A final element of this report relates to an important obligation introduced by the Localism Act 2011, namely the “duty to cooperate”. This requires the council and a wide range of other bodies to co-operate with one another in certain defined activities relating to plan making. In Cambridge’s case, co-operation between the City Council, Cambridgeshire County Council and South Cambridgeshire District Council has been, and will continue to be, critical. At the strategic level, the approach to identifying objectively assessed needs for homes and jobs and to strategic issues has been set out in the Cambridgeshire and Peterborough Memorandum of Co-operation and Spatial Approach.
- 6.2 “Cooperation” does not necessarily mean that there must be complete agreement by all parties on every aspect of the plan; but there must be evidence of joint-working wherever appropriate and attempts to agree on such matters as an evidence base, infrastructure needs, cross-boundary development needs etc. This has been achieved through a close working relationship with South Cambridgeshire District Council and Cambridgeshire County Council through the various stages of plan preparation to date. As a result, there will be a high degree of consistency between the proposed new Cambridge Local Plan and the proposed new Local Plan for South Cambridgeshire and the proposed Transport Strategy for Cambridge and South Cambridgeshire.
- 6.3 It is a legal duty on the council to demonstrate it has undertaken appropriate cooperation under the Act. As such, a Duty to Cooperate



report has been undertaken and is attached for Member approval as Appendix C to this report.

## **7. Changes resulting from Development Plan Scrutiny Sub-Committee on 17 December 2013**

7.1 The committee report and its appendices were presented at the council's Development Plan Scrutiny Sub-Committee on 17 December 2013. The sub-committee supported the recommendations that the plan and Appendices A – C be considered by Environment Scrutiny Committee and Full Council, subject to minor changes and the request that the County Council attends Environment Scrutiny Committee and provides greater comfort on the implementation of the Transport Strategy for Cambridge and South Cambridgeshire. There were a number of very minor changes made to Appendix B: Schedule of Proposed Changes. These changes (numbered as in Appendix B) comprised:

- PM/3/007 – Leave the policy largely unchanged, with only 'and a high quality urban edge' inserted. The change was amended in order to reduce the impact of the original proposed change on the content of the policy;
- PM/3/016 – Inclusion of reference to non-car access to the station area from the east for clarity in order to ensure that the area east of the station does not become more congested with vehicular traffic;
- PM/6/001 – Removal of references to off-site provision of affordable housing as it was considered that the wording was unhelpful in promoting on-site provision where that option proved possible;
- New PM/B/004 – It was considered that the new wording proposed on Site R12 Ridgeons regarding housing typologies and density of development should also be employed in relation to site R10 Mill Road Depot.

## **8. Next Steps**

8.1 Following Environment Scrutiny Committee, the plan will progress to Full Council on 13 February 2014. If Environment Scrutiny Committee agrees the recommendations, Full Council will be recommended to approve the submission of the plan they previously agreed on 27 June 2013, as well as the Schedule of Proposed Changes, Key Issues and the Duty to Cooperate report.

## **9. Implications**

(a) **Financial Implications**

There are both direct and indirect financial implications arising from this report.

The direct financial implications flowing from the approval of the plan relate to the costs of the examination process, including paying the Planning Inspectorate for the fees of a planning inspector in examining the submitted document. There will be some cost savings from holding a joint examination and having a shared programme officer with South Cambridgeshire District Council. However, the costs of preparing a local plan have been budgeted for and included in the budget for 2013-2014 and the medium term financial planning for 2014-2015.

(b) **Staffing Implications** (if not covered in Consultations Section)

There are no direct staffing implications arising from this report. The review of the Local Plan has already been included in existing work plans.

(c) **Equal Opportunities Implications**

There are no direct equal opportunity implications arising from this report. The plan has the potential to impact on different sections of the community, but an Equalities Impact Assessment has been prepared as part of the plan preparation and this demonstrates how potential equalities issues have been, and will be, addressed.

(d) **Environmental Implications**

The new local plan for Cambridge will assist in the delivery of high quality and sustainable new development along with protecting and enhancing the built and natural environments in the city. This will include measures to help Cambridge adapt to the changing climate as well as measures to reduce carbon emissions from new development. Overall, there should be a positive climate change impact.

(e) **Procurement**

There are no direct procurement implications arising from this report.

(f) **Consultation and communication**

The consultation and communications arrangements for the local plan are consistent with the agreed Consultation and Community

Engagement Strategy for the Local Plan Review, 2012 Regulations and the council's Code for Best Practice on Consultation and Community Engagement.

(g) **Community Safety**

There are no direct community safety implications arising from this report.

## 10. Background papers

The following background papers were used in the preparation of this report:

- Localism Act 2011, which can be accessed at: <http://www.legislation.gov.uk/ukpga/2011/20/contents/enacted>
- National Planning Policy Framework 2012, which can be accessed at: <https://www.gov.uk/government/publications/national-planning-policy-framework--2>
- Cambridge Local Plan 2006, which can be accessed at: <https://www.cambridge.gov.uk/local-plan-2006>
- Cambridgeshire and Peterborough Structure Plan 2003 <http://www.cambridgeshire.gov.uk/environment/planning/policies/structure-plan.htm>
- Cambridge Local Plan Towards 2031 – Issues and Options and Issues and Options 2 consultations, which can both be accessed at: <https://www.cambridge.gov.uk/local-plan-review>
- Committee papers for 29 May Development Plan Scrutiny Sub-Committee, which can be accessed at: <http://democracy.cambridge.gov.uk/ieListDocuments.aspx?CId=184&MIId=2438&Ver=4>
- Committee papers for 11 June Environment Scrutiny Committee, which can be accessed at: <http://democracy.cambridge.gov.uk/ieListDocuments.aspx?CId=177&MIId=1032&Ver=4>
- Committee papers for Full Council, which can be accessed at: <http://democracy.cambridge.gov.uk/ieListDocuments.aspx?CId=116&MIId=2427&Ver=4>

## 11. Appendices

- Appendix A: Key Issues;

- Appendix B: Schedule of Proposed Changes;
- Appendix C: Duty to Cooperate Report.

## 12. Inspection of papers

To inspect the background papers or if you have a query on the report please contact:

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Author's Phone Number: 01223 457103  
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## Appendix A: Key Issues arising from Cambridge Local Plan 2014: Proposed Submission Consultation

### Section One: About Cambridge

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

## Section Two: The Spatial Strategy

<b>The Vision for Cambridge</b>	
<b>Total Representations: 21</b>	
<b>Object: 15</b>	<b>Support: 6</b>
<b>Objections</b>	<ul style="list-style-type: none"> <li>• 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;</li> <li>• Vision should make reference to the river corridor through the city;</li> <li>• The plan is pitched too low and lacks ambition for long term needs, particularly transport;</li> <li>• Cambridge has already been overdeveloped and has lost much of its character;</li> <li>• Objection on the retention of Cambridge East as safeguarded land;</li> <li>• Concern about need for enforcement of policies;</li> <li>• 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;</li> <li>• At paragraph 2.3, please add "a mixed community includes disabled people of all ages."</li> </ul>
<b>Support</b>	<ul style="list-style-type: none"> <li>• Vision is supported by the University of Cambridge in relation to its aims for higher education, research and the knowledge-based economy;</li> <li>• The Environment Agency supports the vision through its recognition of protecting and enhancing the environmental quality of the city in a sustainable way;</li> <li>• General support;</li> <li>• Support for the vision of a compact city within the Green Belt.</li> </ul>

<b>Strategic Objectives</b>	
<b>Total Representations: 30</b>	
<b>Object: 20</b>	<b>Support: 10</b>
<b>Objections</b>	<p><b>General:</b></p> <ul style="list-style-type: none"> <li>• The strategic objectives are aspirational but not well supported by the plan itself;</li> <li>• The plan needs to be based on sound evidence, public consent and good</li> </ul>

	<p>delivery;</p> <ul style="list-style-type: none"> <li>• Objectives 1, 6 and 7 should be prioritised over the other objectives;</li> <li>• Add a strategic objective or policy that means decisions on planning applications cannot be used as precedents in the consideration of future planning applications;</li> </ul> <p><b>Strategic Objective 1:</b></p> <ul style="list-style-type: none"> <li>• This objective should be applied to site GB1 Land north of Worts' Causeway and GB2 Land south of Worts' Causeway;</li> </ul> <p><b>Strategic Objective 2:</b></p> <ul style="list-style-type: none"> <li>• No specific representations on this objective;</li> </ul> <p><b>Strategic Objective 3:</b></p> <ul style="list-style-type: none"> <li>• Amend this strategic objective to read: "embracing the principles of sustainable design and construction and Lifetime Homes";</li> <li>• 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;</li> <li>• Enforcement of this is needed to ensure quality development takes place;</li> </ul> <p><b>Strategic Objective 4:</b></p> <ul style="list-style-type: none"> <li>• The plan is at odd with this objective due to the proposals to allocate Green Belt land for development;</li> <li>• 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;</li> </ul> <p><b>Strategic Objective 5:</b></p> <ul style="list-style-type: none"> <li>• No specific representations on this objective;</li> </ul> <p><b>Strategic Objective 6:</b></p> <ul style="list-style-type: none"> <li>• Building on the Green Belt does not achieve Strategic Objective 6;</li> <li>• Importance of Strategic Objective 6 cannot be emphasised enough;</li> </ul> <p><b>Strategic Objective 7:</b></p> <ul style="list-style-type: none"> <li>• Natural England welcome the overall Strategic Objective 7 that requires</li> </ul>
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	<p>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;</p> <ul style="list-style-type: none"> <li>• 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;</li> <li>• 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;</li> </ul> <p><b>Strategic Objective 8:</b></p> <ul style="list-style-type: none"> <li>• 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”;</li> <li>• Strategic Objective 8 should be reworded all not all developments in Cambridge are housing developments;</li> <li>• 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;</li> <li>• 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;</li> </ul> <p><b>Strategic Objective 9:</b></p> <ul style="list-style-type: none"> <li>• No specific representations on this objective;</li> </ul> <p><b>Strategic Objective 10:</b></p> <ul style="list-style-type: none"> <li>• 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;</li> </ul> <p><b>Strategic Objective 11:</b></p> <ul style="list-style-type: none"> <li>• 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;</li> </ul>
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	<p><b>Strategic Objective 12:</b></p> <ul style="list-style-type: none"> <li>• Development on the Green Belt conflicts with this objective;</li> </ul> <p><b>Strategic Objective 13</b></p> <ul style="list-style-type: none"> <li>• No specific representations on this objective;</li> </ul> <p><b>Strategic Objective 14:</b></p> <ul style="list-style-type: none"> <li>• No specific representations on this objective;</li> </ul> <p><b>Strategic Objective 15:</b></p> <ul style="list-style-type: none"> <li>• 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.</li> </ul>
<b>Support</b>	<p><b>General:</b></p> <ul style="list-style-type: none"> <li>• General support;</li> </ul> <p><b>Strategic Objective 1:</b></p> <ul style="list-style-type: none"> <li>• The Environment Agency support this objective and would wish to ensure that they are addressed in the policies which follow;</li> </ul> <p><b>Strategic Objective 2:</b></p> <ul style="list-style-type: none"> <li>• The Environment Agency support this objective and would wish to ensure that they are addressed in the policies which follow;</li> </ul> <p><b>Strategic Objective 3:</b></p> <ul style="list-style-type: none"> <li>• English Heritage support this objective;</li> <li>• The Environment Agency support this objective and would wish to ensure that they are addressed in the policies which follow;</li> </ul> <p><b>Strategic Objective 4:</b></p> <ul style="list-style-type: none"> <li>• English Heritage support this objective, particularly the reference to the positive management of change in the historic environment reflecting the NPPF;</li> <li>• The Environment Agency support this objective and would wish to ensure that they are addressed in the policies which follow;</li> </ul> <p><b>Strategic Objective 5:</b></p> <ul style="list-style-type: none"> <li>• English Heritage support this objective;</li> </ul>

	<p><b>Strategic Objective 6:</b></p> <ul style="list-style-type: none"> <li>• General support;</li> <li>• Importance of Strategic Objective 6 cannot be emphasised enough;</li> <li>• English Heritage support this objective;</li> </ul> <p><b>Strategic Objective 7:</b></p> <ul style="list-style-type: none"> <li>• The Environment Agency support this objective and would wish to ensure that they are addressed in the policies which follow;</li> </ul> <p><b>Strategic Objective 8:</b></p> <ul style="list-style-type: none"> <li>• No specific representations on this objective;</li> </ul> <p><b>Strategic Objective 9:</b></p> <ul style="list-style-type: none"> <li>• The Environment Agency support this objective and would wish to ensure that they are addressed in the policies which follow;</li> </ul> <p><b>Strategic Objective 10:</b></p> <ul style="list-style-type: none"> <li>• The Environment Agency support this objective and would wish to ensure that they are addressed in the policies which follow;</li> </ul> <p><b>Strategic Objective 11:</b></p> <ul style="list-style-type: none"> <li>• No specific representations on this objective;</li> </ul> <p><b>Strategic Objective 12:</b></p> <ul style="list-style-type: none"> <li>• The Environment Agency support this objective and would wish to ensure that they are addressed in the policies which follow;</li> </ul> <p><b>Strategic Objective 13:</b></p> <ul style="list-style-type: none"> <li>• Supported by Cambridgeshire County Council and the Cambridge Cycling Campaign;</li> </ul> <p><b>Strategic Objective 14:</b></p> <ul style="list-style-type: none"> <li>• The Environment Agency support this objective and would wish to ensure that they are addressed in the policies which follow;</li> </ul> <p><b>Strategic Objective 15:</b></p> <ul style="list-style-type: none"> <li>• The Environment Agency supports this objective and would wish to ensure that they are addressed in the policies which follow.</li> </ul>
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<b>Key Diagram</b>	
<b>Total Representations: 3</b>	
<b>Object: 2</b>	<b>Support: 1</b>
<b>Objections</b>	<ul style="list-style-type: none"> <li>• 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;</li> <li>• In paragraph 2.9, add lifetime house and specialist disability housing;</li> <li>• 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.”</li> <li>• 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.”</li> </ul>
<b>Support</b>	<ul style="list-style-type: none"> <li>• Support, particularly for the retention of land in the Green Belt to the west of the city.</li> </ul>

<b>The Spatial Strategy for Cambridge to 2031</b>	
<b>Total Representations: 13</b>	
<b>Object: 12</b>	<b>Support: 1</b>
<b>Objections</b>	<ul style="list-style-type: none"> <li>• The Environment Agency supports the approach taken to the spatial strategy for the location of employment and residential development. However, we strongly recommend that the council packages up its flood risk sequential test into a single document to assist the Inspector with being satisfied that the flood risk sequential test has been applied;</li> <li>• Cambridgeshire County Council objects on the basis that there is inadequate provision for appropriate education provision, notably for the secondary school sector;</li> <li>• Cambridgeshire County Council notes that the transport strategy will be instrumental in supporting development in Cambridge and South Cambridgeshire;</li> <li>• 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"> <li>○ The 2,000 'over-supply' of dwellings in the Memorandum for East</li> </ul> </li> </ul>

	<p>Cambridgeshire, when compared to the level proposed in the East Cambridgeshire Submission Draft Local Plan, should be re-distributed to Cambridge and South Cambridgeshire;</p> <ul style="list-style-type: none"> <li>○ The 2,500 dwelling requirement, which it is claimed has already been accommodated in Peterborough, should be re-distributed to Cambridge and South Cambridgeshire.</li> <li>● 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;</li> <li>● The criteria for objectively assessing need should be set out in the plan;</li> <li>● Objection to development of Green Belt land;</li> <li>● The plan is contradictory in developing the Green Belt sites, whilst looking to maintain a compact city;</li> <li>● 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 fail to take into account;</li> <li>● In Table 2.1, amend reference from student hostels to student rooms;</li> <li>● 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".</li> <li>● 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;</li> <li>● Objection to the sustainable development strategy outlined in the paragraph 2.34, particularly on the basis for the need to improve the transport strategy.</li> </ul>
<b>Support</b>	<ul style="list-style-type: none"> <li>● 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;</li> <li>● 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.</li> </ul>

<b>Policy 1: The presumption in favour of sustainable development</b>	
<b>Total Representations: 37</b>	
<b>Object: 24</b>	<b>Support: 13</b>
<b>Objections</b>	<ul style="list-style-type: none"> <li>• CEG objects on the basis that allocation of land at Cambridge South East would allow for sustainable development;</li> <li>• The Quy Estate objects on the basis that allocation of land around Fen Ditton would allow for sustainable development;</li> <li>• 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;</li> <li>• Policy goes further than the NPPF in its presumption supporting sustainable development;</li> <li>• This policy allows too much development and is not sustainable;</li> <li>• The proposed allocations in the plan cannot be sustainable in the absence of a strategic transport plan for the city;</li> <li>• The policy should frame economic growth rather than being subordinate to it;</li> <li>• Cambridge City Council and South Cambridgeshire District Council have failed to cooperate properly;</li> <li>• Sustainable development is too narrowly defined;</li> <li>• Disability issues must fall within sustainable development;</li> <li>• The plan must not be developer-driven, but must respect and incorporate residents' views;</li> <li>• Constraints identified in the plan (paragraph 2.19) are untested;</li> <li>• Objectively assessed level of need should match the level of affordable housing need in Cambridge;</li> <li>• 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;</li> <li>• Proposed development strategy is inappropriate;</li> <li>• 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.</li> </ul>
<b>Support</b>	<ul style="list-style-type: none"> <li>• The Environment Agency has participated in the joint working that has taken place with Cambridge and South Cambridgeshire. This has</li> </ul>

	<p>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.</p> <ul style="list-style-type: none"> <li>• General support;</li> <li>• Support for the development strategy;</li> <li>• Support for retention of the compact city form;</li> <li>• Cambridge needs housing and employment growth;</li> <li>• Welcome recognition of the need for leisure facilities.</li> </ul>
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<b>Policy 2: Spatial Strategy for the Location of Employment Development</b>	
<b>Total Representations: 16 (including a petition signed by 2,025 people)</b>	
<b>Object: 14 (including a petition signed by 2,025 people)</b>	<b>Support: 2</b>
<b>Objections</b>	<ul style="list-style-type: none"> <li>• 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"> <li>○ lack of exceptional circumstances to justify release of Green Belt land;</li> <li>○ urban sprawl impacting on the historic and compact character of the city, its surrounding villages and countryside and impact on traffic congestion;</li> <li>○ 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.</li> </ul> </li> <li>• 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;</li> <li>• The projections for employment generation over the next two decades cannot be forecast with the precision implied in the plan;</li> <li>• 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;</li> <li>• Mixed use developments are important. The city needs smaller work</li> </ul>

	<p>spaces that contribute to diverse mixed-use communities;</p> <ul style="list-style-type: none"> <li>• 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;</li> <li>• 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;</li> <li>• The plan threatens the loss of our current office space in the Clifton Road area;</li> <li>• The plan fails to address the need for office space in central Cambridge more generally. Our business -- and other Cambridge Cluster businesses -- will be harmed if unable to locate in central Cambridge;</li> <li>• 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;</li> <li>• 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;</li> <li>• 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;</li> <li>• 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;</li> <li>• 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</li> </ul>
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	<p>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;</p> <ul style="list-style-type: none"> <li>• 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;</li> <li>• Oppose further destruction of the Green Belt. There are no exceptional circumstances that justify it;</li> <li>• Oppose urban sprawl that will destroy the historic, compact character of Cambridge, its surrounding villages and countryside and will further add to traffic congestion;</li> <li>• 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;</li> <li>• Too much weight on Green Belt protection at the expense of economic development in sustainable locations;</li> <li>• The employment sites identified will satisfy employment requirements for the 5-10 year period;</li> <li>• Insufficient capacity for other smaller companies who may wish to establish an operating base within or on the edge of Cambridge;</li> <li>• Lack of space within existing plots may necessitate business relocation within the Cambridge fringes;</li> <li>• 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;</li> <li>• The employment targets should be more ambitious to reflect the significant level of desirability that Cambridge offers to global business;</li> <li>• 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;</li> <li>• Consideration should also be given to the potential loss of existing B1(a)</li> </ul>
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	<p>buildings to C3 (residential) uses under recent changes to Permitted Development Rights;</p> <ul style="list-style-type: none"> <li>• The plan requires additional employment land sites (as required by NPPF policy) to meet the Local Plan's employment forecasts;</li> <li>• Growth should be targeted towards non Green Belt locations as part of the overall strategy across Cambridge and South Cambridgeshire.</li> </ul>
<b>Support</b>	<ul style="list-style-type: none"> <li>• This policy provides an appropriate level of continuing development;</li> <li>• This town needs to embrace growth and the provision of employment opportunities for all.</li> </ul>

<b>Policy 3: Spatial Strategy for the Location of Residential Development</b>	
<b>Total Representations: 58 (including a petition signed by 2,025 people)</b>	
<b>Object: 47 (including a petition signed by 2,025 people)</b>	<b>Support: 11</b>
<b>Objections</b>	<ul style="list-style-type: none"> <li>• 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"> <li>○ lack of exceptional circumstances to justify release of Green Belt land;</li> <li>○ urban sprawl impacting on the historic and compact character of the city, its surrounding villages and countryside and impact on traffic congestion;</li> <li>○ 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.</li> </ul> </li> <li>• 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;</li> <li>• 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;</li> <li>• Other alternative sites should have been explored, e.g. the use of the brownfield site at the redundant Barrington Cement works;</li> <li>• Concern about impacts on transport infrastructure;</li> <li>• 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;</li> </ul>

- 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 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;
- 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

	<p>affordable housing needs. The target should be increased to a minimum of 21,300 dwellings between 2011 and 2031;</p> <ul style="list-style-type: none"> <li>• 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;</li> <li>• 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;</li> <li>• 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;</li> <li>• Cambridge has reached capacity and cannot absorb further development;</li> <li>• Based on 2011 Census, housing number should be 12,700 not 14,000;</li> <li>• 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;</li> <li>• 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;</li> <li>• 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;</li> <li>• 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;</li> <li>• Allowance of 92.5 dwellings through windfall per year in the local plan</li> </ul>
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	<p>is not enough. Usual rate is 325.33 per year. 2011 &amp; 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.</p>
<b>Support</b>	<ul style="list-style-type: none"> <li>• Strong support for policy – more homes need to be located close to the city not at a distance which creates congestion and pollution;</li> <li>• The proposed focus accords with the NPPF in encouraging the reuse of brownfield land;</li> <li>• 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;</li> <li>• 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;</li> <li>• 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;</li> <li>• 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.</li> </ul>

<b>Policy 4: The Cambridge Green Belt</b>	
<b>Total Representations: 89 (including a petition signed by 2,025 people)</b>	
<b>Object: 73 (including a petition signed by 2,025 people)</b>	<b>Support: 16</b>
<b>Objections</b>	<ul style="list-style-type: none"> <li>• 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;</li> <li>• 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.</li> <li>• 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</li> </ul>

	<p>the form of the Cambridge Sports Village;</p> <ul style="list-style-type: none"> <li>• Turnstone Estates object on the basis that the Teardrop Site should be released from the Green Belt and allocated for development;</li> <li>• North of Barton Road Landowners Group object on the basis that land to the north of Barton Road should be released from the Green Belt and allocated for development.</li> <li>• 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.</li> <li>• 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;</li> <li>• 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;</li> <li>• 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.”</li> <li>• 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;</li> <li>• More of the Green Belt should be identified for housing, particularly around Barton Road and south of the Addenbrooke’s access road;</li> <li>• Review of the Green Belt should include an assessment of land for safeguarding;</li> <li>• Need for presumption against development in the Green Belt;</li> <li>• 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"> <li>○ lack of exceptional circumstances to justify release of Green Belt land;</li> <li>○ urban sprawl impacting on the historic and compact character of the city, its surrounding villages and countryside and impact on traffic congestion;</li> <li>○ plans being based on out-of-date growth forecasts and first</li> </ul> </li> </ul>
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	<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"> <li>• 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;</li> <li>• Inadequate evidence base on the historic environment and the river corridor;</li> <li>• Inconsistent argument to preserve the Green Belt, but provide development on the Green Belt;</li> <li>• Lack of compliance and inconsistency of approach with reference to national Green Belt objectives;</li> <li>• Need to set out Cambridge's very special circumstances, which do not include provision of further housing;</li> <li>• 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;</li> <li>• Many objections required the use of brownfield land over use of Green Belt land for development;</li> <li>• Forecasting for number of homes is flawed;</li> <li>• Policy should be strengthened to ensure no loss of Green Belt land;</li> <li>• Need for policy to enhance the ecological value of the Green Belt.</li> </ul>
<b>Support</b>	<ul style="list-style-type: none"> <li>• Ready access from the city to the countryside is a key feature of Cambridge's attractiveness;</li> <li>• 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;</li> <li>• Welcome the approach which involves no further incursions into the Green Belt at Trumpington and to the west of the city.</li> </ul>

<b>Policy 5: Strategic Transport Infrastructure</b>	
<b>Total Representations: 42</b>	
<b>Object: 33</b>	<b>Support: 9</b>
<b>Objections</b>	<ul style="list-style-type: none"> <li>• Plan should create more footpaths and re-develop unused railway lines;</li> <li>• 20mph speed limit should not be implemented;</li> <li>• Transport in Cambridge is detrimental to local businesses;</li> <li>• Redevelop unused railway lines to improve access to the city;</li> <li>• Build on brownfield sites with sustainable transport access;</li> </ul>

	<ul style="list-style-type: none"> <li>• Build a computer transportation model illustrating the congestion effect of increased housing;</li> <li>• 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;</li> <li>• The Plan should state: <ul style="list-style-type: none"> <li>○ "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</li> <li>○ "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".</li> </ul> </li> <li>• Re-open Silver Street and Emmanuel Road to normal traffic to improve traffic flow;</li> <li>• Replace lights at dysfunctional and congested junctions (e.g. Huntingdon Road/Histon Road/Victoria Road junction) by roundabouts.</li> <li>• Policy wording should be strengthened;</li> <li>• Need to add design standards suitable for historic environment and conservation areas;</li> <li>• 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;</li> <li>• 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;</li> <li>• 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;</li> <li>• 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;</li> <li>• 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;</li> <li>• 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</li> </ul>
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	<p>interests of all stakeholders in the city;</p> <ul style="list-style-type: none"> <li>• The plan must "require" greater pedestrian and cycle priority rather than merely "promoting" it. Otherwise, public funds will later have to be expended;</li> <li>• 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;</li> <li>• 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 Transport Strategy document are sanctioned;</li> <li>• The policy objective to secure a modal shift will not be achieved with the proposed development strategy;</li> <li>• More explicit reference could be made to: <ul style="list-style-type: none"> <li>○ the role of rail and other public transport modes in the context of this policy in view of their continued importance to Cambridge; and</li> <li>○ the movement of people between the city and other housing and employment centres in the wider area;</li> </ul> </li> <li>• 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;</li> <li>• 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;</li> <li>• 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;</li> <li>• 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;</li> <li>• No evidence that the city's transport infrastructure can accommodate</li> </ul>
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	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.
<b>Support</b>	<ul style="list-style-type: none"> <li>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.</li> </ul>

<b>Policy 6: Hierarchy of Centres and Retail Capacity</b>	
<b>Total Representations: 15</b>	
<b>Object: 10</b>	<b>Support: 5</b>
<b>Objections</b>	<ul style="list-style-type: none"> <li>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;</li> <li>Sequential test must recognise operator requirements;</li> <li>Impact assessments should not be arbitrarily applied;</li> <li>Convenience capacity estimates are conservative;</li> <li>Reduce the 14,141 number to prevent excessive development;</li> <li>Why is Newmarket Road not listed at all, it houses by far the 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;</li> <li>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;</li> <li>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;</li> <li>Nearby developments should be required to 'support and enhance' existing local and neighbourhood centres;</li> <li>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</li> </ul>

	<p>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;</p> <ul style="list-style-type: none"> <li>• 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;</li> <li>• 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;</li> <li>• 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;</li> <li>• Trumpington Local Centre should be designated a District Centre and be expanded to include Waitrose;</li> <li>• 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;</li> <li>• The Beehive Centre should be identified as a District Centre within the Designated Retail Hierarchy;</li> <li>• 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.</li> </ul>
<b>Support</b>	<ul style="list-style-type: none"> <li>• Support the need to protect the vitality and viability of local centres, both existing and new;</li> </ul>

	<ul style="list-style-type: none"> <li>• 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;</li> <li>• 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;</li> <li>• The Market Square area is of such importance to the city that it warrants categorising as a centre in its own right;</li> <li>• The selection appears to reflect local needs;</li> <li>• 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.</li> </ul>
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<b>Policy 7: The River Cam</b>	
<b>Total Representations: 25</b>	
<b>Object: 13</b>	<b>Support: 12</b>
<b>Objections</b>	<ul style="list-style-type: none"> <li>• Need for a strategic plan for the river;</li> <li>• Policy should be strengthened to prohibit development which would worsen conditions and views;</li> <li>• The river is poorly managed and polluted;</li> <li>• More housing development will put pressure on the river;</li> <li>• Residential moorings should be restricted or removed from the river altogether;</li> <li>• Qualifying criteria in the policy with “where possible” weakens the policy;</li> <li>• Caution is needed in managing tourism as it may ruin the river;</li> <li>• Concern over lack of control over moorings below Jesus Lock;</li> <li>• Concern over allocation of site RM1 Fen Road for a marina;</li> <li>• 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;</li> <li>• Reference should be made to employment related to the river, e.g. chandlery;</li> <li>• 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</li> </ul>

	<p>surrendered to exclusive private use except in the most exceptional circumstances;</p> <ul style="list-style-type: none"> <li>• 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;</li> <li>• 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;</li> <li>• 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;</li> <li>• Add a criterion prohibiting further permanent residential moorings on the river bank, other than designated offline marinas;</li> <li>• English Heritage suggest reordering the supporting text to highlight the importance of the historic environment;</li> <li>• Reference to the camToo project is needed in the supporting text;</li> <li>• 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.</li> <li>• 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.</li> </ul>
<b>Support</b>	<ul style="list-style-type: none"> <li>• 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;</li> <li>• General support;</li> <li>• Specific support for reference to the river as an integral, defining feature of the setting of the city and a wildlife resource; conservation of</li> </ul>

	natural river features; and for assessment of the impact of development on views of the river.
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<b>Policy 8: Setting of the city</b>	
<b>Total Representations: 24</b>	
<b>Object: 13</b>	<b>Support: 11</b>
<b>Objections</b>	<ul style="list-style-type: none"> <li>• 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;</li> <li>• 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;</li> <li>• 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;</li> <li>• Natural England considers that the plan should include an overarching green infrastructure policy;</li> <li>• 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;</li> <li>• 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;</li> <li>• 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;</li> <li>• Biodiversity could be increased by replacing monoculture arable land with parks and reserves;</li> <li>• Policy needs strengthening with need for an unambiguous statement of presumption against development on the urban edge;</li> <li>• Need for the preparation of an updated Green Belt Study and updated Landscape Character Assessment;</li> <li>• English Heritage requests the amendment of paragraph 2.73 to refer to wider considerations of setting, particularly the Cambridge skyline and views.</li> </ul>

<b>Support</b>	<ul style="list-style-type: none"><li>• 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;</li><li>• Support for biodiversity protection and enhancement;</li><li>• Need for High Level Stewardship of existing agricultural land to allow access and improved habitat whilst allowing farming to continue effectively.</li></ul>
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**Section Three: City Centre, Areas of Major Change, Opportunity Areas and Site Specific Proposals**

<b>Section Three: City Centre, Areas of Major Change, Opportunity Areas and Site Specific Proposals</b>	
<b>Total Representations: 3</b>	
<b>Object: 3</b>	<b>Support: 0</b>
<b>Objections</b>	<ul style="list-style-type: none"> <li>• The Histon Road, Mill Road, Cherry Hinton Road and Milton Road (including zones on either side of these roads) be designated Major Opportunity Area with high redevelopment densities (4-6 storeys high along the street);</li> <li>• An organisation or cooperative would be set up to drive or empower the redevelopment, and the profit proceeds, after expenses, set aside for the stakeholders. This empowerment would be given carte blanche for an extensive period and any requirement for social housing temporarily suspended. But, should the city be willing to become a substantial stakeholder in the cooperative, the profits accruing to it would be a substantial boost to the provision of affordable housing;</li> <li>• Residential densities for these areas should be reduced;</li> <li>• The County Council request that for the Areas of Major Change and the Opportunity Areas there should be a requirement to prepare a Demographic Change Impact Assessment to demonstrate how the development addresses the needs of an ageing population, including people with physical disabilities, learning disabilities, age-related frailties and mental health issues;</li> <li>• The County Council recommends that: <ul style="list-style-type: none"> <li>○ the co-location of services in single, easy-to-access locations is the best and most cost-effective way to deliver community services in the 21st century. These community hubs should be included and encouraged in local planning applications, especially in new communities where existing provision may not be present;</li> <li>○ the positive approach to assisting the Cambridge economy, particularly the encouragement given to offices, research and development and research facilities in appropriate locations;</li> <li>○ new developments/communities need access, for the health and well-being of their residents, to areas within the development for informal recreation as well as sports pitches and sports centres e.g. the provision of local play spaces.</li> </ul> </li> </ul>
<b>Support</b>	Not applicable



<b>Policy 9: The City Centre</b>	
<b>Total Representations: 12</b>	
<b>Object: 4</b>	<b>Support: 8</b>
<b>Objections</b>	<ul style="list-style-type: none"> <li>• 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;</li> <li>• It is not clear what is meant by heritage assets in this policy – clarification should be provided;</li> <li>• 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;</li> <li>• 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;</li> <li>• More needs to be added to the policy to improve provision for disabled people.</li> </ul>
<b>Support</b>	<ul style="list-style-type: none"> <li>• Full support as the city centre is shockingly neglected in terms of public realm, streetscape, provision of seats, etc;</li> <li>• 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;</li> <li>• 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;</li> <li>• 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.</li> </ul>

<b>Policy 10: Development in the City Centre Primary Shopping Area</b>	
<b>Total Representations: 7</b>	
<b>Object: 6</b>	<b>Support: 1</b>
<b>Objections</b>	<ul style="list-style-type: none"> <li>• Public transport accessibility must be improved;</li> <li>• Need to provide more support for independent traders;</li> <li>• 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;</li> <li>• 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;</li> <li>• 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;</li> <li>• 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;</li> <li>• 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.</li> </ul>
<b>Support</b>	<ul style="list-style-type: none"> <li>• General support.</li> </ul>

<b>Policy 11: Fitzroy/Burleigh Street/Grafton Area of Major Change</b>	
<b>Total Representations: 11</b>	
<b>Object: 8</b>	<b>Support: 3</b>
<b>Objections</b>	<ul style="list-style-type: none"> <li>• 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;</li> <li>• M&amp;G Real Estate and The Prudential Assurance Company Limited, while supportive of the overarching objectives of the policy, are concerned</li> </ul>

	<p>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 the feasibility of such an approach has yet to be properly explored. The policy should be reworded;</p> <ul style="list-style-type: none"> <li>• 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;</li> <li>• The area should not duplicate the City Centre retail offer but provide a real contrast;</li> <li>• 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;</li> <li>• 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;</li> <li>• 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;</li> <li>• 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.</li> </ul>
<b>Support</b>	<ul style="list-style-type: none"> <li>• Support for the development of a masterplan for the area. The area needs a revamp and cycle access in particular needs to be improved.</li> </ul>

<b>Policy 12: Cambridge East</b>	
<b>Total Representations: 15</b>	
<b>Object: 11</b>	<b>Support: 4</b>
<b>Objections</b>	<ul style="list-style-type: none"> <li>• No justification for further housing on the Green Belt;</li> <li>• 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;</li> <li>• 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;</li> <li>• Specific consideration of how the increased use of the airport for “international” flights will affect transport and development in the area must be included;</li> <li>• 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;</li> <li>• 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);</li> <li>• 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;</li> <li>• 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.</li> </ul>
<b>Support</b>	<ul style="list-style-type: none"> <li>• 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;</li> <li>• 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.</li> </ul>

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

**Total Representations: 21**

**Object: 13**

**Support: 8**

**Objections**

- 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 is not the potential for certain infrastructure to be in place;
- 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.

<b>Support</b>	<ul style="list-style-type: none"> <li>• Important in ensuring that areas of major change are developed to the highest quality according to a comprehensive implementation plan;</li> <li>• 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;</li> <li>• Environment Agency supports the policy, in particular criteria (i) to (j) in respect of water, which link to criteria (a) to (f).</li> </ul>
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<b>Policy 14: Northern Fringe East and land surrounding the proposed Cambridge Science Park Station Area of Major Change</b>	
<b>Total Representations: 22</b>	
<b>Object: 14</b>	<b>Support: 8</b>
<b>Objections</b>	<ul style="list-style-type: none"> <li>• Amend allocation to be for residential <u>not</u> business uses;</li> <li>• 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;</li> <li>• 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;</li> <li>• 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;</li> <li>• Site drawn is too small - it should include all land to the east of the railway out to Fen Road;</li> <li>• Area shown should also include Cambridge Science Park;</li> <li>• 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;</li> <li>• 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</li> </ul>

	<p>be reworded;</p> <ul style="list-style-type: none"> <li>• Production of an Area Action Plan would severely delay the development, generate an unwarranted onerous financial cost and an unnecessary administrative and time burden;</li> <li>• Boundary of the area needs to be amended to include the 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;</li> <li>• The allotments at Nuffield Road should not form part of the development and need to be removed from Figure 3.3;</li> <li>• 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;</li> <li>• Support subject to amendment in relation to the footprint of the Waste Water Treatment Works (Environment Agency);</li> <li>• 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;</li> <li>• 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;</li> <li>• Should make specific reference to provision of pubs and student accommodation.</li> </ul>
<p><b>Support</b></p>	<ul style="list-style-type: none"> <li>• 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;</li> <li>• A critical area for the future of Cambridge;</li> <li>• 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;</li> <li>• 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;</li> <li>• Strong support for proposals to maximise development of brownfield land in highly sustainable locations.</li> </ul>



<b>Policy 15: South of Coldham's Lane Area of Major Change</b>	
<b>Total Representations: 59</b>	
<b>Object: 11</b>	<b>Support: 48</b>
<b>Objections</b>	<ul style="list-style-type: none"> <li>• Concern about impact on residential amenity and wildlife. Full consultation on any proposals must be undertaken with local residents;</li> <li>• There should be no new housing on the site;</li> <li>• Development on land directly on top of the landfill site is not appropriate;</li> <li>• Support the goals of the policy but wish for more clarity as to the financing of the masterplan and associated community consultation;</li> <li>• Include provision for a railway stop to serve the lakes and St Bede's Secondary School;</li> <li>• 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;</li> <li>• Bullet point g) needs to be enhanced to make reference to the need for ecological compensation and enhancement measures;</li> <li>• 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;</li> <li>• Criteria (e) and (g), access and conservation are in conflict with one another;</li> <li>• 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;</li> <li>• 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.</li> </ul>
<b>Support</b>	<ul style="list-style-type: none"> <li>• 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;</li> <li>• Good opportunity to enhance wildlife in the area. One lake could be</li> </ul>

	<p>designated as a wildlife reserve;</p> <ul style="list-style-type: none"> <li>• Strong support for non-motorised water sports on the lake;</li> <li>• 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.</li> </ul>
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<b>Policy 16: Cambridge Biomedical Campus (including Addenbrooke’s Hospital) Area of Major Change</b>	
<b>Total Representations: 10</b>	
<b>Object: 6</b>	<b>Support: 4</b>
<b>Objections</b>	<ul style="list-style-type: none"> <li>• Concerned about the emissions associated with the energy centre and potential for waste to be imported for incineration;</li> <li>• Update supporting text to reflect that permission for the Energy Innovation Centre has now been granted;</li> <li>• (Cambridge Medipark Limited): Reference should be made to additional uses such as specialist care homes;</li> <li>• (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);</li> <li>• (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”.</li> </ul>
<b>Support</b>	<ul style="list-style-type: none"> <li>• University of Cambridge capital building projects are planned for development at this site, and as such the policy support for such developments is welcomed;</li> <li>• 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.</li> </ul>

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

<b>Policy 18: West Cambridge Area of Major Change</b>	
<b>Total Representations: 9</b>	
<b>Object: 5</b>	<b>Support: 4</b>
<b>Objections</b>	<ul style="list-style-type: none"> <li>• 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;</li> <li>• The proposed height limit is unduly restrictive and should be removed from the policy;</li> <li>• 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 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;</li> <li>• Need to provide more parking on site and not use surrounding residential streets;</li> <li>• More attention needs to be paid to green infrastructure, light pollution and building heights;</li> <li>• 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;</li> <li>• Need more provision for disabled people;</li> </ul>
<b>Support</b>	<ul style="list-style-type: none"> <li>• Support with accompanying improvements to cycling infrastructure to deal with increased use;</li> <li>• Natural England welcomes criterion (i) on green infrastructure.</li> </ul>

<b>Policy 19: NIAB 1 Area of Major Change</b>	
<b>Total Representations: 12</b>	
<b>Object: 9</b>	<b>Support: 3</b>
<b>Objections</b>	<ul style="list-style-type: none"> <li>• Needs to be accompanied by improved transport infrastructure and connections (e.g. clearly linked to the guided bus and the Science Park);</li> <li>• Needs stronger wording in relation to loss of the sports ground and retention and enhancement of footpaths;</li> </ul>

	<ul style="list-style-type: none"> <li>• 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;</li> <li>• Seek an amendment to criterion (d) to provide more definition in relation to food store provision.</li> </ul>
<b>Support</b>	<ul style="list-style-type: none"> <li>• Will help to enhance life on surrounding estates through improved facilities and public transport routes.</li> </ul>

<b>Policy 20: Station Area West and Clifton Road Areas of Major Change</b>	
<b>Total Representations: 31</b>	
<b>Object: 26</b>	<b>Support: 5</b>
<b>Objections</b>	<ul style="list-style-type: none"> <li>• Emphasis should be on quality architecture to reflect the older architecture of the city – no high rise beyond local heights;</li> <li>• Concern about the impact of ‘leisure uses’ on residential amenity – should be no evening venues or those that serve alcohol;</li> <li>• All vehicle access should be via the existing Cherry Hinton Road (not Rustat Road);</li> <li>• Residential properties only facing Rustat Road;</li> <li>• 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;</li> <li>• A high quality public transport interchange has yet to be delivered. Needs to be better pedestrian and cycle access;</li> <li>• Need to include requirements for transport other than cycling;</li> <li>• 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;</li> <li>• The Chisholm Trail should be identified on Figure 3.7;</li> <li>• 500 homes on this site is too much and not in keeping with the surrounding area;</li> <li>• Concerned about the loss of current office space at Clifton Road as well as no reference to provision of new office space – there is a need for more office space in central Cambridge;</li> <li>• Should make reference to the opportunity that this site presents to create a second entrance to the railway station from the east;</li> <li>• Need for more family homes, not just blocks of flats;</li> <li>• There should be a ceiling on the amount of office development</li> </ul>

	<p>permissible;</p> <ul style="list-style-type: none"> <li>• Station Area West (1) – the residential capacity of 331 units should be tested thoroughly and should be considered a minimum for this sustainable location;</li> <li>• 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);</li> <li>• 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);</li> <li>• 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;</li> <li>• 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;</li> <li>• Need to make specific reference to the phasing of the Clifton Road Area development, and provide timescales for the production of the SPD;</li> <li>• Residential capacity on Clifton Road should be indicative, not maximum;</li> <li>• 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.</li> </ul>
<b>Support</b>	<ul style="list-style-type: none"> <li>• 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;</li> <li>• Support for mixed use development – consider building nurseries, schools, GP surgeries;</li> <li>• Should be a strong emphasis on small working units with housing and retail to produce a vibrant mixed-use local community;</li> <li>• Welcome the acknowledgement of hard surfaces contributing to useable open space;</li> <li>• Support from Cambridge City Council’s Property Services Department, which owns the freehold of Clifton Road Industrial Estate;</li> <li>• Support for the creation of a Supplementary Planning Document for the</li> </ul>

	<p>Clifton Road Area;</p> <ul style="list-style-type: none"> <li>• Support for the potential for a new footbridge between Station Areas West and the Clifton Road Area of Major Change.</li> </ul>
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<b>Policy 21: Mitcham’s Corner Opportunity Area</b>	
<b>Total Representations: 23</b>	
<b>Object: 13</b>	<b>Support: 10</b>
<b>Objections</b>	<ul style="list-style-type: none"> <li>• 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"> <li>○ 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;</li> <li>○ 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.</li> <li>○ The Friends of Mitcham’s Corner would like to be involved in all stages of the process.</li> <li>○ All the sites in the list below should be addressed by masterplanning work on the opportunity area: <ul style="list-style-type: none"> <li>▪ Henry Giles House;</li> <li>▪ Barclays Bank and land down to the river;</li> <li>▪ Staples site with Lloyds TSB Bank;</li> <li>▪ No. 1 Milton Road with possibly The Portland Arms pub;</li> <li>▪ Old Milton Road School site (corner of Milton Road and Gilbert Road;</li> <li>▪ Ailsa Court (Co-op and residential);</li> <li>▪ Cambridge City Football Club;</li> <li>▪ Nos 34 – 36 Chesterton Road;</li> <li>▪ Nos 21 – 23 Milton Road at the entrance to the Westbrook Centre.</li> </ul> </li> </ul> </li> <li>• Wording must be tightened up to ensure the removal of the gyratory;</li> <li>• 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;</li> </ul>



	<ul style="list-style-type: none"> <li>• 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;</li> <li>• Pan Albion and TLC do not consider it appropriate that a masterplan must be approved before an application. The policy needs to be amended so that there is no indication that proposals on prospective application sites be delayed for a masterplan to be prepared;</li> <li>• 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;</li> <li>• 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;</li> <li>• Area would benefit from well-planned parking facilities to support local businesses;</li> <li>• 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;</li> <li>• This policy will prevent free traffic flow and will add to congestion;</li> <li>• Major gaps need to be addressed: <ul style="list-style-type: none"> <li>○ How people will travel to Mitcham's Corner;</li> <li>○ There is currently no coordinated provision of public transport to and from Mitcham's Corner;</li> <li>○ Provision of parking for both shoppers and businesses so that an improved Mitcham's Corner does not impact residents' parking;</li> <li>○ The balance of residential accommodation types so that Mitcham's Corner is a place to live as well as visit.</li> </ul> </li> <li>• Need to reference historic environment, including conservation area status;</li> <li>• 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);</li> <li>• 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;</li> </ul>
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	<ul style="list-style-type: none"> <li>• This opportunity area should incorporate site R3 (Cambridge City Football Club ground off Milton Road);</li> <li>• The map (Figure 3.8) should be amended so that the southern boundary follows the riverbank between Victoria Avenue and Henry Giles House.</li> </ul>
<b>Support</b>	<ul style="list-style-type: none"> <li>• General support for the area's designation as an opportunity area;</li> <li>• General support for the works to the gyratory, but concern that it will not be implemented for some time;</li> <li>• Support for objective of the opportunity area, but concerns about the development of site R4 (Henry Giles House);</li> <li>• 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.</li> </ul>

<b>Policy 22: Eastern Gate Opportunity Area</b>	
<b>Total Representations: 157</b>	
<b>Object: 152</b>	<b>Support: 5</b>
<b>Objections</b>	<ul style="list-style-type: none"> <li>• This policy is tortuous and impenetrable;</li> <li>• There seem to be no caveats in this policy;</li> <li>• 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 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);</li> <li>• 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);</li> <li>• 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;</li> <li>• Policy should be amended to specifically allow for student residential accommodation;</li> <li>• 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</li> </ul>

	<p>community;</p> <ul style="list-style-type: none"> <li>• 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;</li> <li>• 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;</li> <li>• 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;</li> <li>• There is little evidence yet that section 106 funds from new developments in this area are being saved towards the Eastern Gate;</li> <li>• 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"> <li>○ 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";</li> <li>○ Petersfield is considerably under-provided for in terms of accessible green space compared to other wards;</li> <li>○ There are compelling grounds for a legal challenge to any use of any part of St Matthew's piece for development other than recreational use;</li> <li>○ Any building on St Matthew's Piece is contrary to the Strategic Objectives of the Draft Submission Plan, particularly numbers 12 and 15;</li> <li>○ The Howard Mallett Centre should be knocked down and returned to green space;</li> <li>○ The Howard Mallett Centre if retained should provide community facilities for local people.</li> </ul> </li> </ul>
<b>Support</b>	<ul style="list-style-type: none"> <li>• In favour of the improvements to the Elizabeth Way round-about, removing railings and underpasses and improving pedestrian access;</li> <li>• 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.</li> </ul>

<b>Policy 23: Mill Road Opportunity Area</b>	
<b>Total Representations: 32</b>	
<b>Object: 27</b>	<b>Support: 5</b>
<b>Objections</b>	<ul style="list-style-type: none"> <li>• 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;</li> <li>• 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;</li> <li>• Figure 3.10 - R12 Ridgeons Builders Merchants and areas around it should be included in this opportunity area, or be allocated an opportunity area;</li> <li>• Figure 3.10 - The Chisholm trail (figure 9.1) should be identified on the plan of this opportunity area;</li> <li>• 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;</li> <li>• The use of the term 'opportunity' is alarming, both here and elsewhere in the plan;</li> <li>• Delete residential development from the policy and the associated allocations, particularly due to transport and community infrastructure impact;</li> <li>• 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;</li> <li>• The R10 Mill Road Depot site should be explored in terms of its viability for community use;</li> <li>• Proposed development of R10 Mill Road Depot site totally dependent on achieving access;</li> <li>• Creation of open space on the R10 Mill Road Depot site to make up for a shortfall in open space locally;</li> <li>• Both R10 Mill Road Depot and R12 Ridgeons sites have huge problems of contamination;</li> <li>• 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</li> </ul>

	<p>issues:</p> <ul style="list-style-type: none"> <li>○ The masterplan will need to engage with the local community;</li> <li>○ Green space is a major issue for any proposal for development of R21;</li> <li>○ The mix of housing (need affordable housing, whilst avoiding too much student housing), and employment is critical;</li> <li>○ 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;</li> <li>○ 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;</li> <li>● 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;</li> <li>● Retaining sufficient shopping and services to allow people to shop locally without having to resort to cars;</li> <li>● 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 should be actively discouraged;</li> <li>● There should not be a blanket ban on amalgamation of shop units;</li> <li>● Keeping in check the proliferation of hot food take away shops which attract late night trade causing noise and disturbance to nearby homes;</li> <li>● 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;</li> <li>● Identification of vacant land on Perowne Street (derelict former garage) which could be used for a local pocket park;</li> <li>● Improvements in the public realm, including traffic flows and street clutter, are needed;</li> <li>● Some are in particularly sensitive conservation areas - for example, but not exclusively the north east side of Station Road;</li> </ul>
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	<ul style="list-style-type: none"> <li>• 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;</li> <li>• Bharat Bhavan (former Mill Road Library) a grade II listed building, omitted from the plan;</li> <li>• Object because: <ul style="list-style-type: none"> <li>○ 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;</li> <li>○ Hooper Street is only accessible to vehicles along Ainsworth Street and Sturton Street - both are narrow and effectively single lane due to parked cars;</li> <li>○ 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;</li> <li>○ 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;</li> <li>○ The Mill Road Depot redevelopment should only be allowed if access is direct from Mill Road;</li> </ul> </li> <li>• 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;</li> <li>• 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;</li> <li>• Policy 23 opens the door to changes which could result in the destruction of the community and a 'high quality historic environment' in an attempt to cope with traffic;</li> <li>• Improvements are needed for cyclist and cycle parking facilities</li> <li>• 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;</li> <li>• Tackle the issue of pavement parking on Mill Road, with the issue of deliveries on Mill Road needing to be specifically identified;</li> <li>• Policy omits any details on residential development. Many high-density flats are currently being built without any overall plan, while there is a</li> </ul>
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	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.
<b>Support</b>	<ul style="list-style-type: none"> <li>• Strongly support;</li> <li>• 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;</li> <li>• Support the plan to develop better pavements and infrastructure for pedestrians, as well as supporting better frontage and signage on Mill Road;</li> <li>• There are too many difficult to cross junctions, glad this is being addressed;</li> <li>• Mill Road area needs support for independent traders.</li> </ul>

<b>Policy 24: Cambridge Railway Station, Hills Road Corridor to the City Centre Opportunity Area</b>	
<b>Total Representations: 19</b>	
<b>Object: 16</b>	<b>Support: 3</b>
<b>Objections</b>	<ul style="list-style-type: none"> <li>• Opportunity area should be extended to encompass 1 Regent Street and Furness Lodge;</li> <li>• 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;</li> <li>• Do not agree with the Policy 24 heading describing it as a "...Corridor to the city centre";</li> <li>• 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;</li> <li>• Criterion (b) - Object to (b) 'place-making' over vehicle movement - at least in respect of the Railway Station;</li> <li>• 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;</li> <li>• 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;</li> </ul>



	<ul style="list-style-type: none"> <li>• Figure 3.11 - Cambridge Leisure site's central space should not qualify as protected open space on recreational or environmental grounds;</li> <li>• Insert a requirement to consult with, and listen to, local residents;</li> <li>• 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;</li> <li>• 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;</li> <li>• Address potential knock-on consequences as the consequences for traffic flow through and access to residential areas will be considerable;</li> <li>• Must address effectively and enforce loading/parking restrictions, school drop off, commercial vehicles stopping in appropriate locations;</li> <li>• Must address effectively and enforce taxi movement;</li> <li>• Efforts should be made to reduce the number of pedestrian crossings on Regent Street and Hills Road;</li> <li>• This section fails adequately to recognise that this area is a major cycle route;</li> <li>• 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;</li> <li>• 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;</li> <li>• 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.</li> </ul>
<b>Support</b>	<ul style="list-style-type: none"> <li>• General support</li> <li>• 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.</li> <li>• Wider pavements to encourage pedestrian usage between city centre and station is welcome;</li> <li>• Improvement of safety for pedestrians and cyclists, prevention of the amalgamation of shop units, and general refurbishment are all to be</li> </ul>

	<p>welcomed. Most important to keep independent traders alive;</p> <ul style="list-style-type: none"> <li>• Some support including upgrading the link into the Leisure Park and the remodelling of the Cherry Hinton Road junction.</li> </ul>
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<b>Policy 25: Old Press/Mill Lane Opportunity Area</b>	
<b>Total Representations: 11</b>	
<b>Object: 6</b>	<b>Support: 5</b>
<b>Objections</b>	<ul style="list-style-type: none"> <li>• Creating 150-200 residential units and a hotel is incompatible with policy criterion (f);</li> <li>• Principle of streetscape improvements is supported, but reference needs to be made to the Pembroke Street/Mill Lane as a heavily-used cycle route;</li> <li>• 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;</li> <li>• 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;</li> <li>• 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;</li> <li>• 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;</li> <li>• 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.</li> </ul>
<b>Support</b>	<ul style="list-style-type: none"> <li>• 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;</li> <li>• General support for masterplan approach.</li> </ul>

**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**

- Petition signed by 2,025 people and other respondents opposing the further destruction of the Cambridge Green Belt on the basis of:
  - 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';
- 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

	<p>transition from countryside to city;</p> <ul style="list-style-type: none"> <li>• Retain Green Belt land for agriculture;</li> <li>• 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;</li> <li>• Doubt projected need and calculations not fully explained – must be proportionate, adequate, up-to-date and relevant;</li> <li>• Development will increase risk for flooding;</li> <li>• Much wider privacy landscaping required along the western edge of GB2 Land south of Worts' Causeway needed;</li> <li>• 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;</li> <li>• Development will lead to urban sprawl and contradicts policy to retain compact city;</li> <li>• Disturbs bat colony and inevitably adversely affects meadows and wildlife;</li> <li>• Satisfactory buffering between new and existing development, if development is permitted;</li> <li>• Policy will start the process of coalescence with neighbouring villages;</li> <li>• Involves development in area already lacking community facilities;</li> <li>• Ecological assessment of Green Belt land is unsound and biased;</li> <li>• The correct assessment should have been orange or red, there is a thriving ecosystem that needs protection and will be sacrificed by any development;</li> <li>• Council at odds with its policy 'protecting, enhancing and maintaining the unique qualities and character of Cambridge, including...the city's wider landscape and setting';</li> <li>• Allocations contradict Green Belt policy;</li> <li>• Ecological corridors don't work, they are a compromise that avoids the real problem;</li> <li>• The cost for significant upgrades of infrastructure for gas, water, and electricity supplies may fall on the taxpayer rather than developer;</li> <li>• Sites GB1 Land north of Worts' Causeway and GB2 Land south of Worts' Causeway should be masterplanned to deliver a single approach to education;</li> <li>• Object because wider area has not been allocated as well;</li> <li>• A Household Recycling Centre needed to serve the southern area of Cambridge;</li> </ul>
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	<ul style="list-style-type: none"> <li>• Development should ensure/retain the same level of priority to bus movements;</li> <li>• Show Gog Magogs green infrastructure scheme on the Policies Map;</li> <li>• The SSSI status should make this the most protected site for nature conservation in the city;</li> <li>• Housing on this land can be affordable due to high value of the land;</li> <li>• Policy does not work for horse riders as it is too negative;</li> <li>• The developments would contravene the council’s own 800 metre walking distance measurements to amenities for sustainability;</li> <li>• 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;</li> <li>• 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;</li> <li>• GB1 Land north of Worts’ Causeway is unsuitable because of the admitted drainage problems;</li> <li>• 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;</li> <li>• 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;</li> <li>• Delete land north of Worts' Causeway and replace with allocation of land west of Hauxton Road, Trumpington and at the Abbey Stadium, Newmarket Road for the delivery of a community football stadium, indoor and outdoor sports facilities and enabling residential development;</li> <li>• 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;</li> <li>• 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.</li> </ul>
<b>Support</b>	<ul style="list-style-type: none"> <li>• General support for the policy and associated allocations;</li> <li>• Whilst supporting the Green Belt sites, the area could be expanded to</li> </ul>

	<p>around 1,500 homes with priority for affordable homes, top class transport and additional facilities to serve the needs of existing and new neighbourhoods;</p> <ul style="list-style-type: none"> <li>• Support new homes and employment opportunities on these Green Belt sites;</li> <li>• Support development, however any impact on wildlife must be offset and an independent ecological survey carried out;</li> <li>• Policy supports sustainable development;</li> <li>• 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 ;</li> <li>• ARM supports the release of GB3 and GB4 Fulbourn Road, west 1 and 2 for employment development and to facilitate its plans for expansion;</li> <li>• 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;</li> <li>• 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;</li> <li>• Supports allocation, but wants it to include student accommodation.</li> </ul>
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## Section Four: Responding to Climate Change and Managing Resources

<b>Policy 27: Carbon reduction, community energy networks, sustainable design and construction and water use</b>	
<b>Total Representations: 17</b>	
<b>Object: 9</b>	<b>Support: 8</b>
<b>Objections</b>	<ul style="list-style-type: none"> <li>• Policy should be deleted in light of the Housing Standards Review;</li> <li>• At Code 4 some schemes are unviable or are at the margins of viability;</li> <li>• 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;</li> <li>• 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”;</li> <li>• 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;</li> <li>• Definition of zero carbon fails to include reference to transport;</li> <li>• Do not consider that district heating has been considered in sufficient detail to assess whether it will be effective;</li> <li>• From 2016, all homes should be Level 6 of the Code for Sustainable Homes, not Level 4.</li> <li>• BREEAM standards simply cannot be met and result in cost prohibitions that prejudice viability;</li> <li>• Wording needs to be tightened - how can minimum standards not be enforceable;</li> <li>• BREEAM cannot be used for refurbishment of non-residential dwellings – amend policy to allow use of bespoke assessment methodologies where BREEAM is not suitable and levels of attainment equivalent to or higher than BREEAM are set as targets;</li> <li>• 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</li> </ul>



	<p>requirement should be to achieve full credits for the energy/carbon requirements of BREEAM;</p> <ul style="list-style-type: none"> <li>• Insert text to clarify the potential scope of national zero carbon policy for non-residential buildings;</li> <li>• Need to include a definition of ‘not technically or economically viable’ means and how this will be judged;</li> <li>• 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”.</li> </ul>
<b>Support</b>	<ul style="list-style-type: none"> <li>• 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;</li> <li>• The policy is essential if sustainable development is to mean very much;</li> <li>• Full support for the driving principles behind this policy;</li> <li>• Welcome reference to viability in relation to BREEAM standards, as BREEAM ‘excellent’ is not always achievable at all scales of development;</li> <li>• Strong support for the policy and its applicability to all scales of development;</li> <li>• Cambridgeshire County Council welcomes reference to the submission of a Site Waste Management Plan and RECAP Toolkit.</li> </ul>

<b>Policy 28: Allowable solutions for zero carbon development</b>	
<b>Total Representations: 5</b>	
<b>Object: 1</b>	<b>Support: 4</b>
<b>Objections</b>	<ul style="list-style-type: none"> <li>• Policy is contrary to national policy as it is too prescriptive in how Allowable Solutions can be provided.</li> </ul>
<b>Support</b>	<ul style="list-style-type: none"> <li>• Where developers use this approach, it should be used to upgrade/retrofit local housing and other existing buildings;</li> <li>• Support this approach in principle, although further information about the operation of the programme is required.</li> </ul>

<b>Policy 29: Renewable and low carbon energy generation</b>	
<b>Total Representations: 3</b>	
<b>Object: 1</b>	<b>Support: 2</b>
<b>Objections</b>	<ul style="list-style-type: none"> <li>• Support the principle of the policy but consider bullet point (a) should not be qualified by the statement “as far as possible”;</li> <li>• Would query the statement that regarding opportunities for district heating due to expense and that opportunities for stand-alone renewable energy schemes are limited.</li> </ul>
<b>Support</b>	<ul style="list-style-type: none"> <li>• Fully support objectives.</li> </ul>

<b>Policy 30: Energy efficiency improvements in existing dwellings.</b>	
<b>Total Representations: 5</b>	
<b>Object: 1</b>	<b>Support: 4</b>
<b>Objections</b>	<ul style="list-style-type: none"> <li>• 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.”</li> </ul>
<b>Support</b>	<ul style="list-style-type: none"> <li>• 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;</li> <li>• One of the few measures by which the council can require improvements to existing dwellings – fully support.</li> </ul>

<b>Policy 31: Integrated water management and the water cycle</b>	
<b>Total Representations: 8</b>	
<b>Object: 3</b>	<b>Support: 5</b>
<b>Objections</b>	<ul style="list-style-type: none"> <li>• Support the policy but routine and widespread rainwater collection for re-use should be included;</li> <li>• 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).</li> </ul>
<b>Support</b>	<ul style="list-style-type: none"> <li>• Full support for the policy;</li> </ul>

	<ul style="list-style-type: none"> <li>• Welcome reference to green/brown roofs – would be ideal if they could be ‘biodiverse’ roofs;</li> <li>• 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;</li> <li>• Anglian Water supports the policy which gives a strong message on surface water management and climate change adaptation/mitigation.</li> </ul>
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<b>Policy 32: Flood risk</b>	
<b>Total Representations: 5</b>	
<b>Object: 0</b>	<b>Support: 5</b>
<b>Objections</b>	Not applicable
<b>Support</b>	<ul style="list-style-type: none"> <li>• Anglian Water support the policy which gives a strong message on surface water management and climate change adaptation/mitigation;</li> <li>• 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;</li> <li>• Pleased to see future climate scenarios being taken into account when assessing flood risk.</li> </ul>

<b>Policy 33: Contaminated land</b>	
<b>Total Representations: 5</b>	
<b>Object: 5</b>	<b>Support: 0</b>
<b>Objections</b>	<ul style="list-style-type: none"> <li>• Where contamination is suspected an assessment MUST be undertaken, not SHOULD;</li> <li>• 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;</li> <li>• The Environment Agency suggests that the policy needs strengthening to protect groundwater given the importance and vulnerability of aquifers</li> </ul>

	<p>in and around Cambridge. Source protection zones need covering to make the policy effective;</p> <ul style="list-style-type: none"> <li>• 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;</li> <li>• Policy is contrary to the NPPF and is not a planning matter as it is dealt with by other pollution control regimes.</li> </ul>
<b>Support</b>	Not applicable

<b>Policy 34: Light pollution control</b>	
<b>Total Representations: 6</b>	
<b>Object: 2</b>	<b>Support: 4</b>
<b>Objections</b>	<ul style="list-style-type: none"> <li>• Make reference to minimising impact on heritage features and their setting as well as Green Belt and green spaces;</li> <li>• Re: light spillage, some concerns as to the use of ‘minimise’ instead of ‘minimum’;</li> <li>• Should make specific reference to the need to light cycle routes, albeit sensitively.</li> </ul>
<b>Support</b>	<ul style="list-style-type: none"> <li>• Welcome references to impact on the setting of the city (floodlighting being a particular issue on the edge of the city).</li> </ul>

<b>Policy 35: Protection of human health from noise and vibration</b>	
<b>Total Representations: 5</b>	
<b>Object: 2</b>	<b>Support: 3</b>
<b>Objections</b>	<ul style="list-style-type: none"> <li>• The policy as written only protects noise sources from being subjected to residences and not vice versa. The plan should be amended;</li> <li>• Policy is contrary to the NPPF and is not a planning matter as it is dealt with by other pollution control regimes.</li> </ul>
<b>Support</b>	<ul style="list-style-type: none"> <li>• Full support for the policy in particular reference to adequate noise mitigation measures as part of the development package;</li> <li>• 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.</li> </ul>

<b>Policy 36: Air Quality, Odour and Dust</b>	
<b>Total Representations: 7</b>	
<b>Object: 4</b>	<b>Support: 3</b>
<b>Objections</b>	<ul style="list-style-type: none"> <li>• Policy is contrary to the NPPF and is not a planning matter as it is dealt with by other pollution control regimes;</li> <li>• Policy does not sufficiently deal with bus emissions and should 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;</li> <li>• 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)”;</li> <li>• 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.</li> </ul>
<b>Support</b>	<ul style="list-style-type: none"> <li>• Policy is vital to prevent further deterioration in air quality;</li> <li>• Full support from Anglian Water.</li> </ul>

<b>Policy 37: Cambridge Airport Public Safety Zone and Air Safeguarding Zones</b>	
<b>Total Representations: 2</b>	
<b>Object: 1</b>	<b>Support: 1</b>
<b>Objections</b>	<ul style="list-style-type: none"> <li>• Concern that some developments have already breached the requirements of this policy.</li> </ul>
<b>Support</b>	<ul style="list-style-type: none"> <li>• Policy provides appropriate protection for the Public Safety Zones as well as safeguarding zones with appropriate consultation.</li> </ul>

<b>Policy 38: Hazardous installations</b>	
<b>Total Representations: 0</b>	
<b>Object: 0</b>	<b>Support: 0</b>
<b>Objections</b>	Not applicable
<b>Support</b>	Not applicable

<b>Policy 39: Mullard Radio Astronomy Observatory, Lord's Bridge</b>	
<b>Total Representations: 2</b>	
<b>Object: 0</b>	<b>Support: 2</b>
<b>Objections</b>	Not applicable
<b>Support</b>	<ul style="list-style-type: none"> <li>• Important to safeguard the international importance of this site.</li> </ul>

## Section Five: Supporting the Cambridge Economy

<b>Policy 40: Development and Expansion of Business Space</b>	
<b>Total Representations: 8</b>	
<b>Object: 8</b>	<b>Support: 0</b>
<b>Objections</b>	<ul style="list-style-type: none"> <li>• Locate offices close to northern rail station and guided busway stops e.g. north Cambridge;</li> <li>• Lack of clarity for source of figures for West Cambridge in table 5.2. Remove floorspace and land figures from the table;</li> <li>• The city should learn from North West Cambridge; providing housing and local centres at the new employment sites released from the Green Belt;</li> <li>• 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;</li> <li>• The plan threatens the loss of our current office space in the Clifton Road area;</li> <li>• The plan fails to address the need for office space in central Cambridge more generally;</li> <li>• 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;</li> <li>• 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;</li> <li>• 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;</li> <li>• The wording of policy 40 should be amended to make more obvious cross reference to Appendix B: Proposals Schedule;</li> <li>• Insufficient land has been allocated for employment use. The employment requirement should be 245,000sqm on 46 hectares of land;</li> <li>• The proposed allocations are either not available, not suitable or will be subject to deliverability issues;</li> <li>• There are no large scale employment allocations proposed to support</li> </ul>



	<p>the economy;</p> <ul style="list-style-type: none"> <li>• 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;</li> <li>• The proposed science park at Cambridge South site would meet the forecast employment land requirements.</li> </ul>
<b>Support</b>	Not applicable

<b>Policy 41: Protection of business space</b>	
<b>Total Representations: 10</b>	
<b>Object: 9</b>	<b>Support: 1</b>
<b>Objections</b>	<ul style="list-style-type: none"> <li>• Allowance for temporary use change of space should be included to allow greater flexibility into the future as markets change;</li> <li>• Not enough new centres have been identified in policy 6;</li> <li>• 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";</li> <li>• 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 ...";</li> <li>• 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;</li> <li>• 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;</li> <li>• Clarification sought as to whether or not this particular policy would be applicable to allocated sites such as Mount Pleasant House;</li> <li>• 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."</li> </ul>

<b>Support</b>	<ul style="list-style-type: none"> <li>• Not everyone works in high-tech industry, there has to be provision for more traditional industry too.</li> </ul>
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<b>Policy 42: Connecting New Developments to Digital Infrastructure</b>	
<b>Total Representations: 1</b>	
<b>Object: 1</b>	<b>Support: 0</b>
<b>Objections</b>	No Key Issues.
<b>Support</b>	Not applicable

<b>Policy 43: University Faculty Development</b>	
<b>Total Representations: 136</b>	
<b>Object: 135</b>	<b>Support: 1</b>
<b>Objections</b>	<ul style="list-style-type: none"> <li>• No further expansion of the East Road Campus;</li> <li>• No student development and Anglia Ruskin University expansion in the Petersfield area - build more well-proportioned, affordable housing for young families instead;</li> <li>• 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;</li> <li>• 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;</li> <li>• A further increase in the transient population in Petersfield will affect community cohesion;</li> <li>• The provision of purpose-built student accommodation negatively impacts local families, by depriving them of an income stream from renting rooms out to students;</li> <li>• 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;</li> <li>• Policy should include different types of University development;</li> <li>• Policy should include proposed uses and masterplanning process for the</li> </ul>

	<p>New Museums site;</p> <ul style="list-style-type: none"> <li>• Policy should include other University of Cambridge sites with development potential;</li> <li>• Paragraph 5.24 should include actual planned student growth;</li> <li>• 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;</li> <li>• 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;</li> <li>• Reductions in car parking provision should not impact on blue badge parking provision.</li> </ul>
<b>Support</b>	<ul style="list-style-type: none"> <li>• Support for the reference to 'the development of medical teaching facilities and related university research institutes at Cambridge Biomedical Campus'.</li> </ul>

<b>Policy 44: Specialist Colleges and Language Schools</b>	
<b>Total Representations: 10</b>	
<b>Object: 7</b>	<b>Support: 3</b>
<b>Objections</b>	<ul style="list-style-type: none"> <li>• 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;</li> <li>• 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;</li> <li>• This policy discriminates against specialist colleges and language schools making it extremely difficult to develop;</li> <li>• The traditional approach to providing student accommodation suggested in the supporting text does not recognise the way the student</li> </ul>

	<p>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;</p> <ul style="list-style-type: none"> <li>• 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;</li> <li>• 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;</li> <li>• 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.</li> </ul>
<b>Support</b>	<ul style="list-style-type: none"> <li>• Good idea to house all students;</li> <li>• 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.</li> </ul>

## Section Six: Maintaining a Balanced Supply of Housing

<b>Policy 45: Affordable housing and dwelling mix</b>	
<b>Total Representations: 23</b>	
<b>Object: 17</b>	<b>Support: 6</b>
<b>Objections</b>	<ul style="list-style-type: none"> <li>• The plan will not provide enough scope to meet the housing need, particularly the affordable housing need;</li> <li>• 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;</li> <li>• 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;</li> <li>• Affordable housing policy simply results in market housing being more expensive and less available;</li> <li>• Retain current threshold of 40% and 15 units;</li> <li>• 40% requirement is too high;</li> <li>• Affordable housing requirements must be enforced;</li> <li>• 10% requirement for 2 to 9 units of housing development risks damaging social diversity;</li> <li>• The desired mix, size and tenure for housing should be defined;</li> <li>• Staged strategy for larger sites should be set out;</li> <li>• Overall planning obligations should be clearly stated;</li> <li>• Single and clear determination method is required;</li> <li>• The term 'on-site' is confusing and is used repeatedly in the policy;</li> <li>• Clarification required that the exceptional circumstances include viability issues;</li> <li>• No justification for paragraph 6.7 to refer to employment proposals.</li> </ul>
<b>Support</b>	<ul style="list-style-type: none"> <li>• It is important to provide affordable housing within the city for people to live close to places of work;</li> <li>• Need to close any loopholes where developers subdivide sites to avoid affordable housing requirements;</li> <li>• 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;</li> <li>• Approach is supported and must be enforced.</li> </ul>

**Policy 46: Development of student housing**

**Total Representations: 19**

**Object: 19**

**Support: 0**

**Objections**

- 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 mainstream residential accommodation;
- 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

	<p>of the rooms have specialist facilities for disabled people”;</p> <ul style="list-style-type: none"> <li>Amend paragraph 6.14 to replace the second and third sentences with “Student accommodation should be well designed, providing appropriate space standards and facilities.”</li> </ul>
<b>Support</b>	Not applicable

<b>Policy 47: Specialist housing</b>	
<b>Total Representations: 5</b>	
<b>Object: 4</b>	<b>Support: 1</b>
<b>Objections</b>	<ul style="list-style-type: none"> <li>The policy should require specialist housing to comply with relevant quality standards;</li> <li>Specialist housing should be of high quality design to promote a sense of pride, identity and community;</li> <li>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;</li> <li>More over 50s retirement homes should be made available;</li> <li>In paragraph 6.15, replace "people with physical, sensory and learning disabilities," with "disabled people";</li> <li>In paragraph 6.16, amend by adding: <ul style="list-style-type: none"> <li>"Student accommodation;</li> <li>Respite, rehabilitation and convalescent accommodation;</li> <li>Bespoke accommodation;</li> <li>Specialist housing providers."</li> </ul> </li> </ul>
<b>Support</b>	<ul style="list-style-type: none"> <li>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.</li> </ul>

<b>Policy 48: Housing in Multiple Occupation</b>	
<b>Total Representations: 14</b>	
<b>Object: 11</b>	<b>Support: 3</b>
<b>Objections</b>	<ul style="list-style-type: none"> <li>Over concentration of HMOs needs to be quantified;</li> <li>It is difficult to monitor HMOs once established;</li> <li>HMOs reduce the amount of family housing available and encourage</li> </ul>



	<p>buy to let;</p> <ul style="list-style-type: none"> <li>• HMOs affect the stability and cohesion of communities and impact negatively on the environmental quality of an area;</li> <li>• Small HMOs should also be covered by this policy as in Oxford;</li> <li>• Should be a limit on HMOs tailored to different areas of the city, particularly Petersfield;</li> <li>• Remove criterion (a) as it could restrict the development of HMOs which are much needed to address housing need;</li> <li>• New development should meet Building for Life standards;</li> <li>• Policy should make a distinction between HMOs which let to short-term tenants and long-term tenants;</li> <li>• Policy should define what contributions HMO developments should be making;</li> <li>• Policy should be more prescriptive in order to ensure better quality development;</li> <li>• Policy should set out obligations on HMO owners for living standards and maintenance;</li> </ul>
<b>Support</b>	<ul style="list-style-type: none"> <li>• 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;</li> <li>• 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;</li> <li>• Support for the provision of multiple occupation housing, particularly innovative solutions such as cohousing. This is more sustainable and helps build communities.</li> </ul>

<b>Policy 49: Provision for Gypsies and Travellers</b>	
<b>Total Representations: 3</b>	
<b>Object: 3</b>	<b>Support: 0</b>
<b>Objections</b>	<ul style="list-style-type: none"> <li>• 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;</li> <li>• The figure of one plot also assumes negative population growth, no net migration and ignores those living in bricks and mortar who would</li> </ul>

	<p>prefer to live on caravan sites should there be provision;</p> <ul style="list-style-type: none"> <li>• A stopping place near Addenbrooke’s would greatly improve access for this community;</li> <li>• The city should consider Gypsy and Traveller provision alongside every development;</li> <li>• The policy should provide a specific allocation for pitch provision to meet the need set out in the GTANA;</li> <li>• Amend the policy to alter criterion (f) from “residents” to “residences” to relate to developments and the built environment;</li> <li>• Amend the policy by adding a criterion (j) to read “The site is fully accessible for disabled users”.</li> </ul>
<b>Support</b>	Not applicable

<b>Policy 50: Residential space standards</b>	
<b>Total Representations: 15</b>	
<b>Object: 11</b>	<b>Support: 4</b>
<b>Objections</b>	<ul style="list-style-type: none"> <li>• Policy would have an adverse impact on the viability and delivery of sites in Cambridge, particularly smaller sites;</li> <li>• Market-led approach to the design of housing should be pursued;</li> <li>• The policy’s scope should be wider than space and make more reference to design;</li> <li>• Lack of locally derived evidence on space standards;</li> <li>• The minimum floorspaces should be increased, particularly for units for 1 person;</li> <li>• Minimum storage space is vital;</li> <li>• All houses should have external garden space;</li> <li>• Need for adequately sized windows to be referred to, in order to ensure enough natural light;</li> <li>• 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."</li> <li>• Add new criterion (h) to read “the amenity should be fully wheelchair accessible.”</li> <li>• Add text to paragraph 6.30 to read “space for a store and charging facility for a scooter or outdoor wheelchair.”</li> </ul>

<b>Support</b>	<ul style="list-style-type: none"> <li>• Minimum space standards are important.</li> </ul>
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<b>Policy 51: Lifetime Homes and Lifetime Neighbourhoods</b>	
<b>Total Representations: 11</b>	
<b>Object: 8</b>	<b>Support: 3</b>
<b>Objections</b>	<ul style="list-style-type: none"> <li>• Policy should provide an evidence base for the required ratio of Lifetime Homes;</li> <li>• Cost of Lifetime Homes has not been sufficiently factored in and may render development unviable, particularly for flatted development;</li> <li>• Policy does not reflect national policy for wide choice and inclusive and mixed communities;</li> <li>• New development should also meet Building for Life standards;</li> <li>• Higher percentage of wheelchair housing is needed;</li> <li>• Amend criterion (b) by removing ", or be easily adapted to meet them.";</li> <li>• Amend policy text by replacing "Compliance with the criteria should be demonstrated in the design and access statement 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."</li> <li>• 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."</li> <li>• 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."</li> <li>• Paragraph 6.36 should also be applied to Buildings of Local Interest.</li> </ul>
<b>Support</b>	<ul style="list-style-type: none"> <li>• New development should be able to meet changing needs, particularly those of an ageing population;</li> <li>• Lifetime Homes principles already applied in the design of our new homes (Berkeley Homes).</li> </ul>

<b>Policy 52: Protecting garden land and the subdivision of existing dwelling plots</b>	
<b>Total Representations: 6</b>	
<b>Object: 4</b>	<b>Support: 2</b>
<b>Objections</b>	<ul style="list-style-type: none"> <li>• Set a quantitative standard for development of garden land or other prescriptive definitive criteria to have a minimum impact on surrounding area;</li> <li>• Use standards set out for residential space standards to ensure sufficient space for residents;</li> <li>• Add reference to access and impact on local transport networks to policy;</li> <li>• Add reference to cycle parking provision in the policy;</li> <li>• Paragraph 6.37 should also refer to replacement of existing non-residential structures such as garages, sheds, farm structures etc.</li> <li>• In reference to paragraph 6.38, gardens are important everywhere in the city, not just in its more verdant, arcadian quarters;</li> <li>• In reference to paragraph 6.38, gardens can also provide food growing places and this should be referred to here.</li> </ul>
<b>Support</b>	<ul style="list-style-type: none"> <li>• Gardens are important resources of community value;</li> <li>• Garden grabbing has often resulted in unsuitable design.</li> </ul>

<b>Policy 53: Flat Conversions</b>	
<b>Total Representations: 8</b>	
<b>Object: 7</b>	<b>Support: 1</b>
<b>Objections</b>	<ul style="list-style-type: none"> <li>• 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;</li> <li>• The policy should take into account the effect of conversions on the local mix of residential types and family homes;</li> <li>• 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;</li> <li>• Criterion (c) of the policy refers to “negative impact”, which is not defined;</li> <li>• Criterion (c) of the policy should be amended to read “ the proposal, in</li> </ul>

	<p>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”;</p> <ul style="list-style-type: none"> <li>• Add to text to paragraph 6.41 to read “That access and accommodation for disabled people is not reduced or worsened”;</li> <li>• The requirement for parking surveys is unjustified in the case of small scale developments and should be deleted from paragraph 6.43.</li> </ul>
<b>Support</b>	<ul style="list-style-type: none"> <li>• It is vital that the cumulative impact is taken into account as the current policy is too lax.</li> </ul>

<b>Policy 54: Residential Moorings</b>	
<b>Total Representations: 7</b>	
<b>Object: 5</b>	<b>Support: 2</b>
<b>Objections</b>	<ul style="list-style-type: none"> <li>• 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;</li> <li>• Current residential boats should be removed when vacated by current occupants;</li> <li>• New moorings should only be permitted where there are mains services available for all boats;</li> <li>• Houseboats should not contribute to meeting housing need, as their accommodation is often sub-standard;</li> <li>• 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;</li> <li>• The policy does not address health, safety or disabled access issues;</li> <li>• Lack of evidence base for quantitative need for moorings – need for an existing condition survey and study to inform policy clearly;</li> <li>• Site RM1 Fen Road is not in a sustainable location and will not be used fully due to its location;</li> <li>• Site RM1 Fen Road should be developed as housing;</li> <li>• Change the policy title to 'Residential and Visitor Moorings' and remove from housing section to sit with River Cam or Public Open Spaces strategy;</li> <li>• Create new policy with three elements: <ul style="list-style-type: none"> <li>a) Proposals for new residential moorings alongside the towpath will</li> </ul> </li> </ul>

	<p>not generally be permitted. The council seeks to gradually reduce online mooring and restore public access to enhance 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"> <li>• 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";</li> <li>• 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";</li> <li>• An additional criterion (h) should be added "That the towpath is accessible, see guidance by British Waterways for disabled access";</li> <li>• An additional criterion (h) should be added "allows adequate access to the river from the bank in common areas";</li> <li>• An additional criterion (i) should be added "provides for adequate mooring for boats visiting Cambridge";</li> <li>• An additional criterion (j) should be added "seeks to reduce linear mooring and encourages and promotes offline mooring";</li> <li>• An extension of residential moorings in Cambridge (implied by paragraph 6.47) has not been a matter of specific consultation;</li> <li>• 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.</li> </ul>
<b>Support</b>	<ul style="list-style-type: none"> <li>• 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.</li> </ul>

## Section Seven: Protecting and Enhancing the Character of Cambridge

<b>Policy 55: Responding to context</b>	
<b>Total Representations: 8</b>	
<b>Object: 5</b>	<b>Support: 3</b>
<b>Objections</b>	<ul style="list-style-type: none"> <li>• The council needs to show a determination for quality and the need to enforce the policies and any obligations imposed on developers;</li> <li>• Policy wording is weak and gives little protection to conservation areas and heritage assets;</li> <li>• New large developments can act as a dangerous precedent for newer larger developments;</li> <li>• 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.</li> </ul>
<b>Support</b>	<ul style="list-style-type: none"> <li>• Support for the policy reflecting the requirements of the NPPF with regard to design.</li> </ul>

<b>Policy 56: Creating successful places</b>	
<b>Total Representations: 18</b>	
<b>Object: 16</b>	<b>Support: 2</b>
<b>Objections</b>	<ul style="list-style-type: none"> <li>• The Council needs to show a determination for quality and the need to enforce the policies and any obligations imposed on developers;</li> <li>• 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;</li> <li>• Criterion (b) - The phrase "not allowing vehicular traffic to dominate" is insufficient. Cambridge will only cope with large housing growth if high levels of cycling are actively catered for;</li> <li>• Criteria (h) and (k) should be amended to meet the needs of disabled people;</li> <li>• 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;</li> <li>• 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;</li> </ul>

	<ul style="list-style-type: none"> <li>• 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;</li> <li>• The policy should apply to both major and minor development and conservation areas;</li> <li>• The policy should cross reference other council policies (e.g. on tall buildings) to add a level of objectivity;</li> <li>• 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;</li> <li>• Policy needs to be more specific about density requirements;</li> <li>• Higher densities are more appropriate for urban living;</li> <li>• Many new developments are insensitive in scale in comparison to the existing historic, built environment;</li> <li>• The quality of architecture in many recent buildings is poor.</li> </ul>
<b>Support</b>	<ul style="list-style-type: none"> <li>• Support in principle.</li> </ul>

<b>Policy 57: Designing new buildings</b>	
<b>Total Representations: 16</b>	
<b>Object: 13</b>	<b>Support: 3</b>
<b>Objections</b>	<ul style="list-style-type: none"> <li>• 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;</li> <li>• 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 development' (paragraph 58);</li> <li>• The wording needs to be stronger, e.g. must not detract from the existing environment, must not be of inappropriate scale and massing etc;</li> <li>• This policy is both vague and unduly prescriptive;</li> <li>• The plan should offer examples of good design;</li> <li>• Masterplans should be formed and followed and architects must submit design proposals;</li> <li>• Require design standards that prevent the box-like bland structures that we see around Hills Road/Cherry Hinton Road junction;</li> </ul>



	<ul style="list-style-type: none"> <li>• 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;</li> <li>• The policy does not contain a restriction on the height of buildings</li> <li>• There is no statement about gardens;</li> <li>• The measures captured in the policy are wide ranging and will need particular determination and skill in enforcing;</li> <li>• 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.</li> </ul>
<b>Support</b>	<ul style="list-style-type: none"> <li>• Support this policy;</li> <li>• Welcomes suggested 'green initiatives' mentioned in policy (Criteria (c), (d), (e) and paragraph 7.11).</li> </ul>

<b>Policy 58: Altering and extending existing buildings</b>	
<b>Total Representations: 11</b>	
<b>Object: 7</b>	<b>Support: 4</b>
<b>Objections</b>	<ul style="list-style-type: none"> <li>• The policy refers to design details which are overly prescriptive and contrary to guidance in paragraph 58 in the NPPF;</li> <li>• 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";</li> <li>• The policy should also apply to conservation areas, new buildings erected in gardens and to the removal of trees, hedges from gardens;</li> <li>• 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;</li> <li>• Criteria (b), (c) and (d) - The wording is imprecise and potentially contradictory with criterion (b) permitting designs to contrast with existing building form whilst criteria (c) and (d) seek designs that respect and are sympathetic to the original building;</li> <li>• Criterion (e) - Proposals which increase sound/light disturbance for neighbours e.g. from creation of new car parks etc should be refused;</li> <li>• Criterion (g) - The policy should not promote private car usage by creating extra opportunities for their use e.g. enlarged parking areas</li> </ul>

	<p>etc;</p> <ul style="list-style-type: none"> <li>• 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”;</li> <li>• The historic parts of the city - including those of the first quarter of the 20<sup>th</sup> century - should enjoy a presumption on retention, alteration and re-use;</li> <li>• 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;</li> <li>• 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.</li> </ul>
<b>Support</b>	<ul style="list-style-type: none"> <li>• Supports this policy</li> <li>• Need for clear policy which takes into account the factors listed, including impact on skyline and neighbourhood;</li> <li>• Welcome policy 58 which will protect and enhance biodiversity.</li> </ul>

<b>Policy 59: Designing landscape and the public realm</b>	
<b>Total Representations: 7</b>	
<b>Object: 6</b>	<b>Support: 1</b>
<b>Objections</b>	<ul style="list-style-type: none"> <li>• 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;</li> <li>• 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;</li> <li>• 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;</li> <li>• Plantings should be used to help disabled people wayfind providing they do not create slip or trip hazards;</li> <li>• Actual figures should be put on these aims so they are not open to</li> </ul>

	interpretation e.g. 10% of all land to be used for green space.
<b>Support</b>	<ul style="list-style-type: none"> <li>Support this policy including the use of landscape design as part of a holistic approach to urban and rural developments.</li> </ul>

<b>Policy 60: Tall buildings and the skyline in Cambridge</b>	
<b>Total Representations: 19</b>	
<b>Object: 17</b>	<b>Support: 2</b>
<b>Objections</b>	<ul style="list-style-type: none"> <li>This is a methodology not a policy and a specific policy is not necessary;</li> <li>Omit the words 'or exceed 19m within the historic core (see Section Three on City Centre) or 13m outside it.';</li> <li>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;</li> <li>This policy should be consistent with Policy 37 which would appear to limit developments to a maximum of 15m in the city's core;</li> <li>Need a specific measurable level above which development in Cambridge will not be considered. Please set a height limit of around 19 metres;</li> <li>The term 'significantly taller' than surrounding buildings is unclear and needs to be clearly defined to remove any ambiguity;</li> <li>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;</li> <li>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 buildings on the skyline in the historic core especially;</li> <li>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;</li> <li>Criterion (c) - Please include massing here, many objections to new tall</li> </ul>

	<p>buildings have made reference to this point and it is not mentioned here</p> <ul style="list-style-type: none"> <li>• 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;</li> <li>• Criterion (d) - The loss of light and creation of wind tunnels by tall buildings should be ameliorated;</li> <li>• Amend the policy with provision of a new criterion (f) “All tall buildings should have passenger lifts serving all floors”;</li> <li>• 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;</li> <li>• Other considerations such as the historic legibility and character of the conservation area should be accorded great weight;</li> <li>• Policy should consider lifetime flexibility of use;</li> <li>• The policy needs to be based on a historic environment strategy for Cambridge and its setting;</li> <li>• 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;</li> <li>• The historic core should be clearly defined;</li> <li>• 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);</li> <li>• 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;</li> <li>• Planning guidance needs to be developed alongside this policy so as to prevent exploitation;</li> <li>• It is the practical implementation of this objective which remains key.</li> </ul>
<b>Support</b>	<ul style="list-style-type: none"> <li>• The objective of maintaining or enhancing the overall character and qualities of the skyline as the city grows is laudable.</li> </ul>

<b>Policy 61: Conservation and enhancement of Cambridge’s historic environment</b>	
<b>Total Representations: 21</b>	
<b>Object: 17</b>	<b>Support: 4</b>
<b>Objections</b>	<ul style="list-style-type: none"> <li>• The policy is not strong enough;</li> <li>• The policy’s criteria are unduly restrictive;</li> <li>• The policy should refer to paragraph 60 of the NPPF;</li> <li>• This policy is not distinctive to Cambridge, or proactive in its approach to the historic environment of the city, as envisaged in the NPPF;</li> <li>• The policy should clearly distinguish between designated and undesignated heritage assets and clarify circumstances in which works to heritage assets would be justified;</li> <li>• The policy should commit to the preparation of an historic environment strategy;</li> <li>• More reference to archaeology should be made in the supporting text to the policy;</li> <li>• Any development should preserve/enhance conservation areas;</li> <li>• Remove criterion (e) from the policy as it undermines the policy;</li> <li>• No outline applications should be allowed in conservation areas;</li> <li>• 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;</li> <li>• 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.</li> <li>• Add specific reference to historic parks and gardens in Appendix C.</li> </ul>
<b>Support</b>	<ul style="list-style-type: none"> <li>• General support;</li> <li>• Support, with regular review of conservation areas.</li> </ul>

<b>Policy 62: Local heritage assets</b>	
<b>Total Representations: 11</b>	
<b>Object: 10</b>	<b>Support: 1</b>
<b>Objections</b>	<ul style="list-style-type: none"> <li>• 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</li> <li>• Policy 62 is overly restrictive and statutory provisions already exist for listed buildings and conservation areas which are adequate;</li> <li>• Designation of local heritage assets may not be consistent and rigorous;</li> <li>• Appendix G should be amended to set out criteria for the designation of locally listed structures, features and gardens;</li> <li>• 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;</li> <li>• Policy should be strengthened to prevent any loss of an asset;</li> <li>• Further local heritage assets still need to be identified, including newer buildings and gardens;</li> <li>• Permission should always be required for changes to local heritage assets;</li> <li>• All proposed local designations should be notified to owners and the justification published for consultation prior to designation being confirmed.</li> </ul>
<b>Support</b>	<ul style="list-style-type: none"> <li>• General support.</li> </ul>

<b>Policy 63: Works to a heritage asset to address climate change</b>	
<b>Total Representations: 10</b>	
<b>Object: 5</b>	<b>Support: 5</b>
<b>Objections</b>	<ul style="list-style-type: none"> <li>• 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;</li> <li>• Policy needs to take more account of significance of heritage asset in a proportionate manner;</li> <li>• Policy is overly onerous and could act as a disincentive to action;</li> <li>• Monitoring should only be necessary in exceptional circumstances and this needs to be clarified;</li> </ul>

	<ul style="list-style-type: none"> <li>Principles of Heritage Partnership Agreements should be extended to locally listed buildings;</li> </ul>
<b>Support</b>	<ul style="list-style-type: none"> <li>Support for the commitment to tackling climate change and reducing carbon emissions;</li> <li>Support for the use of the energy hierarchy in assessing works to a heritage asset;</li> <li>Support for the reuse of older buildings to retain embodied energy and enhance their environmental performance.</li> </ul>

<b>Policy 64: Shopfronts, signage and shop security measures</b>	
<b>Total Representations: 2</b>	
<b>Object: 0</b>	<b>Support: 2</b>
<b>Objections</b>	Not applicable
<b>Support</b>	<ul style="list-style-type: none"> <li>Supported to improve the environment.</li> </ul>

<b>Policy 65: Visual Pollution</b>	
<b>Total Representations: 3</b>	
<b>Object: 2</b>	<b>Support: 1</b>
<b>Objections</b>	<ul style="list-style-type: none"> <li>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";</li> <li>The commons should be protected from visual pollution.</li> </ul>
<b>Support</b>	<ul style="list-style-type: none"> <li>Support for policy.</li> </ul>

<b>Policy 66: Paving over front gardens</b>	
<b>Total Representations: 4</b>	
<b>Object: 1</b>	<b>Support: 3</b>
<b>Objections</b>	<ul style="list-style-type: none"> <li>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.”</li> </ul>
<b>Support</b>	<ul style="list-style-type: none"> <li>Support for policy to maintain amenity and environment.</li> </ul>

<b>Policy 67: Protection of open space</b>	
<b>Total Representations: 46</b>	
<b>Object: 41</b>	<b>Support: 5</b>
<b>Objections</b>	<ul style="list-style-type: none"> <li>Remove "replacement" option for environmentally important sites;</li> <li>More robust policy protection required; policy fails to prevent duplication/intensification of uses;</li> <li>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;</li> <li>Amended policy to allow the continued growth of the College;</li> <li>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;</li> <li>Natural England concerned that a criteria-based policy to protect and enhance soils is missing.</li> </ul>
<b>Support</b>	<ul style="list-style-type: none"> <li>Sport England and The Wildlife Trust support this policy.</li> </ul>

<b>Policy 68: Open space and recreation provision through new development</b>	
<b>Total Representations: 18</b>	
<b>Object: 13</b>	<b>Support: 5</b>
<b>Objections</b>	<ul style="list-style-type: none"> <li>Open space should be provided as part of all new developments;</li> <li>Policy should presume on-site provision with no 'get out clause';</li> <li>Clearer definition of protected open spaces on the policies map;</li> <li>Development contributions should not be required to address existing</li> </ul>



	<p>deficiencies in open space provision. Policy clarification needed to ensure that duplicate provision would not be required;</p> <ul style="list-style-type: none"> <li>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.</li> </ul>
<b>Support</b>	<ul style="list-style-type: none"> <li>Fundamentally important to the quality of life.</li> </ul>

<b>Policy 69: Protection of sites of local nature conservation importance</b>	
<b>Total Representations: 10</b>	
<b>Object: 5</b>	<b>Support: 5</b>
<b>Objections</b>	<ul style="list-style-type: none"> <li>Policy should be strengthened; protection, rather than the possibility of development, should be the intent of this policy;</li> <li>Proposals on or adjacent to a site of local conservation importance should not be refused planning permission without proper consideration;</li> <li>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.</li> </ul>
<b>Support</b>	<ul style="list-style-type: none"> <li>Development will only be allowed where it will not adversely affect biodiversity and nature;</li> <li>City Wildlife Sites should be recognised fully for their importance.</li> </ul>

<b>Policy 70: Protection of priority species and habitats</b>	
<b>Total Representations: 9</b>	
<b>Object: 5</b>	<b>Support: 4</b>
<b>Objections</b>	<ul style="list-style-type: none"> <li>Policy should actively promote and enhance the natural environment with ecological networks. These should be mapped on the policies map;</li> <li>Biodiversity offsetting is rarely ever effective;</li> <li>Policy should be strengthened with regard to minimising the loss of local biodiversity. Mitigation/compensatory measures should be the last resort;</li> <li>Natural England have stated that policy needs to reflect the NPPF which confirms that any proposal that adversely affects a European site, or</li> </ul>

	causes significant harm to a SSSI, will not normally be granted permission.
<b>Support</b>	<ul style="list-style-type: none"> <li>• Adequate protection should be provided to the water voles in Cherry Hinton Brook.</li> </ul>

<b>Policy 71: Trees</b>	
<b>Total Representations: 15</b>	
<b>Object: 7</b>	<b>Support: 8</b>
<b>Objections</b>	<ul style="list-style-type: none"> <li>• Greater attention should be given to the protection of locally significant trees.</li> <li>• Stronger evidence should be required for tree felling.</li> <li>• Policy should be strengthened.</li> </ul>
<b>Support</b>	<ul style="list-style-type: none"> <li>• Cambridge needs to protect its trees as well as planting more trees, including fruit and nut species especially those supporting biodiversity.</li> </ul>

## Section Eight: Services and Local Facilities

<b>Policy 72: Development and change of use in district, local and neighbourhood centres.</b>	
<b>Total Representations: 9</b>	
<b>Object: 7</b>	<b>Support: 2</b>
<b>Objections</b>	<ul style="list-style-type: none"> <li>• Temporary use changes and flexibility of use zones would allow for more reactive, creative and entrepreneurial development and use of space in the city;</li> <li>• 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;</li> <li>• Recent planning policy towards change of use of premises in B1(a) office to C3 residential units should be addressed in this policy;</li> <li>• Should include provisions to protect the local businesses in Mill Road and Norfolk Street from the intrusion of chain stores;</li> <li>• 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';</li> <li>• 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;</li> <li>• 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;</li> <li>• 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.</li> </ul>
<b>Support</b>	<ul style="list-style-type: none"> <li>• No key issues.</li> </ul>

<b>Policy 73: Community, sports and leisure facilities</b>	
<b>Total Representations: 33</b>	
<b>Object: 25</b>	<b>Support: 8</b>
<b>Objections</b>	<ul style="list-style-type: none"> <li>• Plan should support a Community Stadium;</li> <li>• Site for a Community Stadium should be allocated to minimise risk and uncertainty;</li> <li>• Site for an ice rink should be allocated;</li> <li>• Requirement for on-site provision should be stronger;</li> <li>• Definition of community facilities should be simplified and modified to include waste management services;</li> <li>• Requirement for Health Impact Assessments policy;</li> <li>• No specific reference to faith communities, their needs and faith facilities;</li> <li>• Revitalise the Howard Mallett Centre and not for office use or student accommodation;</li> <li>• Disabled access requirement for facilities.</li> </ul>
<b>Support</b>	<ul style="list-style-type: none"> <li>• No Community Stadium should be built on Green Belt;</li> <li>• Multi-functional facilities.</li> </ul>

<b>Policy 74 : Education facilities</b>	
<b>Total Representations: 7</b>	
<b>Object: 4</b>	<b>Support: 3</b>
<b>Objections</b>	<ul style="list-style-type: none"> <li>• Use infill/brownfield sites for new schools and not just housing;</li> <li>• School provision not addressed in the plan along with wider provision of infrastructure. Site(s) for new schools should be included;</li> <li>• Policy 74 conflicts with Policy 67: Protection of open space;</li> <li>• New education facilities should ensure satisfactory access for disabled people.</li> </ul>
<b>Support</b>	<ul style="list-style-type: none"> <li>• Schools should be located in the area that they serve.</li> </ul>

<b>Policy 75: Healthcare facilities</b>	
<b>Total Representations: 5</b>	
<b>Object: 4</b>	<b>Support: 1</b>
<b>Objections</b>	<ul style="list-style-type: none"> <li>• Extend policy to work with other NHS organisations that have a land planning role;</li> <li>• Site for a replacement Arthur Rank Hospice should be allocated;</li> <li>• Medical facilities provision not addressed in Plan along with wider provision of infrastructure;</li> <li>• New medical facilities should ensure satisfactory access for disabled people.</li> </ul>
<b>Support</b>	<ul style="list-style-type: none"> <li>• Co-location of facilities.</li> </ul>

<b>Policy 76: Protection of public houses</b>	
<b>Total Representations: 6</b>	
<b>Object: 3</b>	<b>Support: 3</b>
<b>Objections</b>	<ul style="list-style-type: none"> <li>• Policy should be simplified and made less prescriptive;</li> <li>• Policy is unlawful because it has no legal basis and is an obstacle to development;</li> <li>• The council should not specify how many public houses per head should exist based upon the local population;</li> <li>• Much stronger protection of public houses gardens especially in areas deficient in open space.</li> </ul>
<b>Support</b>	<ul style="list-style-type: none"> <li>• Support for protecting public houses and their alternative community use.</li> </ul>

<b>Policy 77: Development and expansion of hotels</b>	
<b>Total Representations: 131</b>	
<b>Object: 128</b>	<b>Support: 3</b>
<b>Objections</b>	<ul style="list-style-type: none"> <li>• Location of Hotels: <ul style="list-style-type: none"> <li>○ They should be sited in industrial areas;</li> <li>○ Close to the airport;</li> <li>○ Near Park and Ride facilities;</li> <li>○ Not in Eastern Gate or Petersfield.</li> </ul> </li> </ul>

	<ul style="list-style-type: none"> <li>• 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;</li> <li>• A reference to hotels submitted as sui generis developments and contribution towards affordable housing is required;</li> <li>• A dedicated policy dealing with aparthotels and serviced apartments is needed to properly assess them in Use Class terms;</li> <li>• Policy 41 conflicts with the intentions of Policy 77 through the blanket protection of all employment space within with the city;</li> <li>• 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;</li> <li>• There should be more than adequate hotel parking provided unless close to a public car park.</li> </ul>
<b>Support</b>	<ul style="list-style-type: none"> <li>• Support location of new hotel development at Old Press/Mill Lane.</li> </ul>

<b>Policy 78: Redevelopment or loss of hotels</b>	
<b>Total Representations: 0</b>	
<b>Object: 0</b>	<b>Support: 0</b>
<b>Objections</b>	Not applicable
<b>Support</b>	Not applicable

<b>Policy 79: Visitor attractions</b>	
<b>Total Representations: 3</b>	
<b>Object: 2</b>	<b>Support: 1</b>
<b>Objections</b>	<ul style="list-style-type: none"> <li>• Policy should better manage visitor attractions and facilities;</li> <li>• Encourage long-term visitors and discourage coach parties;</li> <li>• Ensure satisfactory access for disabled people.</li> </ul>
<b>Support</b>	<ul style="list-style-type: none"> <li>• No specific proposal for a Community Stadium in Trumpington.</li> </ul>

## Section Nine: Providing the infrastructure to support development

<b>Policy 80: Supporting sustainable access to development</b>	
<b>Total Representations: 25</b>	
<b>Object: 20</b>	<b>Support: 5</b>
<b>Objections</b>	<ul style="list-style-type: none"> <li>• 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;</li> <li>• 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;</li> <li>• Policy wording needs strengthening in relation to access to transport for disabled people;</li> <li>• The wording of the Chisholm Trail should be tightened, including specific guarantees that a cycle route between Hooper Street and Mill Road be provided;</li> <li>• 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;</li> <li>• Provision for cycling needs to take account of high levels of cycling within Cambridge and go beyond national standards;</li> <li>• 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;</li> <li>• 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;</li> <li>• Levels of 40-45% cycle trips should be a policy aim;</li> <li>• Should include the Local Plan 2006 policy wording on lorries and servicing of new developments;</li> <li>• Park and Ride provision needs to be extended and promoted;</li> <li>• Should make reference to need for additional bus and coach interchange</li> </ul>

	<p>(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 Newmarket Road and Victoria Avenue;</p> <ul style="list-style-type: none"> <li>• 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.</li> </ul>
<b>Support</b>	<ul style="list-style-type: none"> <li>• Support emphasis on cycling, walking and public transport in new development and in meeting Cambridge’s transport needs;</li> <li>• Agree that sustainable transport alternatives are essential in fringe locations;</li> <li>• Good, easy access to a high quality and efficient transport network is essential to supporting new development and to ensuring it is sustainable;</li> <li>• Welcome the references to the Chisholm Trail;</li> <li>• 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;</li> <li>• Support the need for a high-quality pedestrian and cycle network to be in place early in the release of a new development.</li> </ul>

<b>Policy 81: Mitigating the transport impact of development</b>	
<b>Total Representations: 11</b>	
<b>Object: 10</b>	<b>Support: 1</b>
<b>Objections</b>	<ul style="list-style-type: none"> <li>• The definition “reasonable and proportionate financial contributions/mitigation measures” and grounds for an "unacceptable transport impact" are not clearly defined;</li> <li>• 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;</li> <li>• 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</li> </ul>



	<p>examination in public.</p> <ul style="list-style-type: none"> <li>• 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";</li> <li>• The provision of a travel plan should not be seen as a substitute to the provision of actual infrastructure (it should complement it);</li> <li>• All residential development of above 60 dwellings must provide a travel plan;</li> <li>• 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);</li> <li>• 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;</li> <li>• Transport links must be in place before building any housing developments;</li> <li>• Local plan needs to work well with related strategies and plans, residential access and business needs must also be considered and integrated.</li> </ul>
<b>Support</b>	<ul style="list-style-type: none"> <li>• 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.</li> </ul>

<b>Policy 82: Parking Management</b>	
<b>Total Representations: 11</b>	
<b>Object: 11</b>	<b>Support: 0</b>
<b>Objections</b>	<ul style="list-style-type: none"> <li>• The policy departs from the NPPF as it retains maximum standards for non-residential development;</li> <li>• Delete reference to car parking levels being maintained at current levels for shoppers, residents and workers; as it is unclear, onerous and unnecessary;</li> </ul>

	<ul style="list-style-type: none"> <li>• Need more recognition of need for parking provision for disabled people;</li> <li>• 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.</li> <li>• Key principles should be in policy text not in appendices or supporting documents;</li> <li>• Apply a more flexible, demand-based approach to assessing car parking provision. This is less prescriptive and more responsive to local circumstances;</li> <li>• 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.</li> <li>• Cycle parking standards are too onerous for Anglia Ruskin University considering close links to bus interchange and residential accommodation;</li> <li>• 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;</li> <li>• 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.</li> </ul>
<b>Support</b>	Not applicable

<b>Policy 83: Aviation Development</b>	
<b>Total Representations: 6</b>	
<b>Object: 2</b>	<b>Support: 4</b>
<b>Objections</b>	<ul style="list-style-type: none"> <li>• 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";</li> <li>• The policy lacks any specific measurement of term "significant adverse impact";</li> <li>• It is also based entirely on monitoring through control of planning applications (Appendix M) which is not satisfactory as cumulative</li> </ul>

	<p>permitted development, in addition to intensification of use, allows substantial increases in activity;</p> <ul style="list-style-type: none"> <li>• Aviation is unsustainable and resources would be better spent on improving rail and cycle networks;</li> <li>• The use of the airport as an international airport is a significant threat to quality of life in the southern part of Cambridge.</li> </ul>
<b>Support</b>	<ul style="list-style-type: none"> <li>• Increased noise from expanded operations at the airport has a major impact on health and wellbeing and must be carefully monitored;</li> <li>• This policy must be applied in instances where planning permission is required for development at the airport.</li> </ul>

<b>Policy 84: Telecommunications</b>	
<b>Total Representations: 3</b>	
<b>Object: 3</b>	<b>Support: 0</b>
<b>Objections</b>	<ul style="list-style-type: none"> <li>• 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;</li> <li>• Remove criterion (c) as it duplicates national guidance and legislation;</li> <li>• Criterion (c) of the policy is too vague regarding the issues which the development will be assessed against;</li> <li>• In paragraph 9.36 supporting the policy, reference should be made to the need for facilities specifically for disabled people.</li> </ul>
<b>Support</b>	<ul style="list-style-type: none"> <li>• Not applicable</li> </ul>

<b>Policy 85: Infrastructure delivery, planning obligations and the Community Infrastructure Levy</b>	
<b>Total Representations: 142</b>	
<b>Object: 136</b>	<b>Support: 6</b>
<b>Objections</b>	<ul style="list-style-type: none"> <li>• 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;</li> </ul>

- 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 public realm are proposed in relation to new development, subject to agreement by elected representatives;
- 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

	<p>consideration;</p> <ul style="list-style-type: none"> <li>• 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.</li> </ul>
<b>Support</b>	<ul style="list-style-type: none"> <li>• 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;</li> <li>• 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;</li> <li>• Paragraph 9.42: Welcome the inclusion of play space under 'Necessary Infrastructure'.</li> </ul>

**Appendix A: The Development Plan for Cambridge**

<b>Appendix A: The Development Plan for Cambridge</b>	
<b>Total Representations: 2</b>	
<b>Object: 1</b>	<b>Support: 1</b>
<b>Objections</b>	<ul style="list-style-type: none"> <li>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.</li> </ul>
<b>Support</b>	<ul style="list-style-type: none"> <li>Support for the inclusion of allocations/designations made by the Cambridgeshire and Peterborough Minerals and Waste Development Plan.</li> </ul>

## Appendix B: Proposals Schedule

Appendix B: Proposals Schedule (Representations submitted to Appendix B in general)	
Total Representations: 7	
Object: 6	Support: 1
<b>Objections</b>	<ul style="list-style-type: none"> <li>• Further sites for allocation:               <ul style="list-style-type: none"> <li>○ Allocate the Triangle (Cambridge University Press) for employment/office use;</li> <li>○ 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;</li> <li>○ 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;</li> <li>○ Sites AGS 62 The Pightle and Principals Lodge, P&amp;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"> <li>▪ Site B - Strachey &amp; 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.</li> <li>▪ 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 en-suite rooms.</li> <li>▪ Sites F/G/H - Barton Road &amp; 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).</li> </ul> </li> </ul> </li> <li>• Need for infrastructure delivery to be identified for each site within the</li> </ul>

	<p>proposals schedule in order to ensure a coherent strategy for sites coming forward;</p> <ul style="list-style-type: none"> <li>• Need for a third round of consultation on the capacity of sites.</li> </ul>
<b>Support</b>	<ul style="list-style-type: none"> <li>• 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.</li> </ul>

<b>Site GB1: Land north of Worts' Causeway</b>	
<b>Total Representations: 96 (including a petition signed by 2,025 people)</b>	
<b>Object: 93 (including a petition signed by 2,025 people)</b>	<b>Support: 3</b>
<b>Objections</b>	<ul style="list-style-type: none"> <li>• 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"> <li>○ Lack of exceptional circumstances to justify release of Green Belt land;</li> <li>○ Urban sprawl impacting on the historic and compact character of the city, its surrounding villages and countryside and impact on traffic congestion;</li> <li>○ 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.</li> </ul> </li> <li>• Commercial Estates Group objected to the site allocation on the basis of: <ul style="list-style-type: none"> <li>○ Insufficient evidence to demonstrate the deliverability and density of a number of allocated sites;</li> <li>○ Insufficient release of land to deliver housing and employment development to meet objectively assessed needs;</li> <li>○ Plans rely on infrastructure of high cost and uncertain delivery;</li> <li>○ Plans do not promote sustainable transport;</li> <li>○ Spatial distribution of development undermines the economic competitiveness of Cambridge;</li> <li>○ Need for a joint plan for Cambridge and South Cambridgeshire to deliver growth;</li> <li>○ Incorrect application of national Green Belt policy and flawed methodology for analysis of landscape value;</li> <li>○ Flawed sustainability appraisal of the plans;</li> <li>○ 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.</li> </ul> </li> </ul>



	<ul style="list-style-type: none"> <li>• Teversham Parish Council objected to the site allocation on the basis of: <ul style="list-style-type: none"> <li>○ 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.</li> <li>○ 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.</li> </ul> </li> <li>• Retain existing agricultural use;</li> <li>• Loss of Green Belt land in food production;</li> <li>• Impact on flood risk;[</li> <li>• Impact on neighbouring amenity;</li> <li>• Impact on biodiversity, including red list species and strategically important wildlife habitats;</li> <li>• Impact on footpaths, setting and compact nature of the city;</li> <li>• 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;</li> <li>• Set out provision for strategic green infrastructure and ecological enhancement within the allocation;</li> <li>• Establish a green corridor linking the head of Hobson's Conduit through to Gog Magog Down, the Beechwoods and Wandlebury;</li> <li>• Poor access onto Worts' Causeway;</li> <li>• Impact on community infrastructure, such as education and primary healthcare;</li> <li>• Impact on congestion on local roads, which are already heavily used;</li> <li>• Impact on bus services, including Park and Ride bus;</li> <li>• Distance to services is unsustainable and would encourage car use;</li> <li>• Gas infrastructure below ground on site will impact on developability;</li> <li>• Lack of infrastructure plan for the site;</li> <li>• Lack of strategic transport plan for allocation;</li> <li>• Loss of green amenity space for local people;</li> <li>• Destruction of historical and rural area of Worts' Causeway;</li> <li>• 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;</li> <li>• Density should be increased on other sites, rather than releasing GB1 Land north of Worts' Causeway and GB2 Land south of Worts' Causeway.</li> <li>• Reduce developable area of GB1 Land north of Worts' Causeway to 4.3 hectares, provide lower density family housing on the site and provide a buffer to the wildlife site.</li> </ul>
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<b>Support</b>	<ul style="list-style-type: none"> <li>• Support on the basis of provision of housing.</li> </ul>
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<b>Site GB2: Land south of Worts' Causeway</b>	
<b>Total Representations: 93 (including a petition signed by 2,025 people)</b>	
<b>Object: 90 (including a petition signed by 2,025 people)</b>	<b>Support: 3</b>
<b>Objections</b>	<ul style="list-style-type: none"> <li>• 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"> <li>○ lack of exceptional circumstances to justify release of Green Belt land;</li> <li>○ urban sprawl impacting on the historic and compact character of the city, its surrounding villages and countryside and impact on traffic congestion;</li> <li>○ 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.</li> </ul> </li> <li>• Commercial Estates Group objected to the site allocation on the basis of: <ul style="list-style-type: none"> <li>○ Insufficient evidence to demonstrate the deliverability and density of a number of allocated sites;</li> <li>○ Insufficient release of land to deliver housing and employment development to meet objectively assessed needs;</li> <li>○ Plans rely on infrastructure of high cost and uncertain delivery;</li> <li>○ Plans do not promote sustainable transport;</li> <li>○ Spatial distribution of development undermines the economic competitiveness of Cambridge;</li> <li>○ Need for a joint plan for Cambridge and South Cambridgeshire to deliver growth;</li> <li>○ Incorrect application of national Green Belt policy and flawed methodology for analysis of landscape value;</li> <li>○ Flawed sustainability appraisal of the plans;</li> <li>○ 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.</li> </ul> </li> <li>• Teversham Parish Council objected to the site allocation on the basis of: <ul style="list-style-type: none"> <li>○ 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.</li> </ul> </li> </ul>

	<ul style="list-style-type: none"> <li>○ 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.</li> <li>● Retain existing agricultural use;</li> <li>● Loss of Green Belt land in food production;</li> <li>● Impact on flood risk;</li> <li>● Impact on biodiversity, including red list species and strategically important wildlife habitats;</li> <li>● Impact on footpaths, setting and compact nature of the city;</li> <li>● Impact on views and landscape character of area, particularly given the proximity of site to Gog Magog Down, the Beechwoods and Wandlebury;</li> <li>● Set out provision for strategic green infrastructure and ecological enhancement within the allocation;</li> <li>● Establish a green corridor linking the head of Hobson's Conduit through to Gog Magog Down, the Beechwoods and Wandlebury;</li> <li>● Impact on community infrastructure, such as education and primary healthcare;</li> <li>● Impact on congestion on local roads, which are already heavily used;</li> <li>● Impact on bus services, including Park and Ride bus;</li> <li>● Distance to services is unsustainable and would encourage car use;</li> <li>● Gas infrastructure below ground on site will impact on developability;</li> <li>● Lack of infrastructure plan for the site;</li> <li>● Lack of strategic transport plan for allocation;</li> <li>● Loss of green amenity space for local people;</li> <li>● Destruction of historical and rural area of Worts' Causeway;</li> <li>● 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;</li> <li>● Density should be increased on other sites, rather than releasing GB1 Land north of Worts' Causeway and GB2 Land south of Worts' Causeway.</li> </ul>
<b>Support</b>	<ul style="list-style-type: none"> <li>● Landowner supports the allocation of the site for development, but seeks clarity on provision of community facilities and services;</li> <li>● Support on the basis of provision of housing;</li> </ul>

<b>Site R1: 295 Histon Road</b>	
<b>Total Representations: 8</b>	
<b>Object: 7</b>	<b>Support: 1</b>
<b>Objections</b>	<ul style="list-style-type: none"> <li>● Sport England object to allocation for residential development as it</li> </ul>

	<p>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;</p> <ul style="list-style-type: none"> <li>• Squash courts should be replaced on site or at R2 Willow croft;</li> <li>• Area is already subject to excessive traffic levels;</li> <li>• Site should not be designated for residential development;</li> <li>• Site is not capable of accommodating the number of dwellings suggested;</li> <li>• Allocation reduces small and medium scale opportunities for employment development;</li> <li>• Community facilities should be provided to remedy the existing shortfall of facilities in Castle Ward.</li> </ul>
<b>Support</b>	<ul style="list-style-type: none"> <li>• Support and would welcome provision of open space within site.</li> </ul>

<b>Site R2: Willowcroft, 137 – 143 Histon Road</b>	
<b>Total Representations: 6</b>	
<b>Object: 3</b>	<b>Support: 3</b>
<b>Objections</b>	<ul style="list-style-type: none"> <li>• 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;</li> <li>• Site should not be designated for residential development;</li> <li>• Site is not capable of accommodating the number of dwellings suggested;</li> <li>• Allocation reduces small and medium scale opportunities for employment development;</li> <li>• Area is already subject to excessive traffic levels;</li> <li>• Community facilities should be provided to remedy the existing shortfall of facilities in Castle Ward.</li> </ul>
<b>Support</b>	<ul style="list-style-type: none"> <li>• General support;</li> <li>• Site needs comprehensive approach, including provision of new sports and other facilities for local community.</li> </ul>

<b>Site R3: City Football Ground, Milton Road</b>	
<b>Total Representations: 2</b>	
<b>Object: 1</b>	<b>Support: 1</b>
<b>Objections</b>	<ul style="list-style-type: none"> <li>• Site should be included in Mitcham’s Corner Opportunity Area (Policy 21).</li> </ul>
<b>Support</b>	<ul style="list-style-type: none"> <li>• General support.</li> </ul>

<b>Site R4: Henry Giles House, 73 – 79 Chesterton Road</b>	
<b>Total Representations: 9</b>	
<b>Object: 5</b>	<b>Support: 4</b>
<b>Objections</b>	<ul style="list-style-type: none"> <li>• Allocation removes important services from the site;</li> <li>• Site should not be designated for residential development;</li> <li>• Site is not capable of accommodating the number of dwellings suggested;</li> <li>• Allocation reduces opportunities for employment development;</li> <li>• Area is already subject to excessive traffic and parking levels;</li> <li>• Access from Chesterton Road only;</li> <li>• Site must accommodate all its own parking;</li> <li>• Further pressure on local services.</li> </ul>
<b>Support</b>	<ul style="list-style-type: none"> <li>• General support;</li> <li>• Welcome the possibility of replacement of the existing building with high quality, innovative architecture;</li> </ul>

<b>Site R5: Camfields Resource Centre and Oil Depot, 137 – 139 Ditton Walk</b>	
<b>Total Representations: 2</b>	
<b>Object: 0</b>	<b>Support: 2</b>
<b>Objections</b>	Not applicable
<b>Support</b>	<ul style="list-style-type: none"> <li>• General support, particularly if the site provides its own car parking within the site.</li> </ul>

<b>Site R7: The Paddocks, 347 Cherry Hinton Road</b>	
<b>Total Representations: 6</b>	
<b>Object: 3</b>	<b>Support: 3</b>
<b>Objections</b>	<ul style="list-style-type: none"> <li>• Maximum height of development should be limited to three storeys;</li> <li>• Development should not be of a high density;</li> <li>• Negative impact on local biodiversity;</li> <li>• Allocation reduces small and medium scale opportunities for employment development.</li> </ul>
<b>Support</b>	<ul style="list-style-type: none"> <li>• Landowner support for allocation;</li> <li>• General support;</li> <li>• Support subject to design of buildings being consistent in scale with surrounding streets and retention of existing trees and vegetation.</li> </ul>

<b>Site R8: 149 Cherry Hinton Road and Telephone Exchange, Coleridge Road</b>	
<b>Total Representations: 4</b>	
<b>Object: 4</b>	<b>Support: 0</b>
<b>Objections</b>	<ul style="list-style-type: none"> <li>• 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;</li> <li>• 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;</li> <li>• The site is suitable for retail use, given its location near local centres (Aldi);</li> <li>• Allocation reduces small and medium scale opportunities for employment development;</li> <li>• Allocation means the loss of a local service to the community.</li> </ul>
<b>Support</b>	Not applicable

<b>Site R9: Travis Perkins, Devonshire Road</b>	
<b>Total Representations: 10</b>	
<b>Object: 7</b>	<b>Support: 3</b>
<b>Objections</b>	<ul style="list-style-type: none"> <li>• No further residential development in the area;</li> <li>• Site allocation should be for mixed use;</li> <li>• Need for comprehensive masterplan for major development sites;</li> <li>• Development will have a negative impact on existing public open space in Petersfield and more open space must be provided;</li> <li>• Density of allocation is too high;</li> <li>• Number of affordable homes should be increased;</li> <li>• Junction of Devonshire Road and Mill Road is already very dangerous and will be further affected by this development.</li> </ul>
<b>Support</b>	<ul style="list-style-type: none"> <li>• General support;</li> <li>• Support provision of the Chisholm Trail from this site.</li> </ul>

<b>Site R10: Mill Road Depot and adjoining properties, Mill Road</b>	
<b>Total Representations: 194 (including one survey of 10 residents and one petition signed by 130 people)</b>	
<b>Object: 188 (including one survey of 10 residents and one petition signed by 130 people)</b>	<b>Support: 6</b>
<b>Objections</b>	<ul style="list-style-type: none"> <li>• 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;</li> <li>• 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</li> <li>• Many objections to Mill Road Depot being allocated, objected on the basis of: <ul style="list-style-type: none"> <li>○ Density of proposed development is too high – reference was made . representations to densities of between 19dph and 35dph being considered acceptable;</li> <li>○ Access to the site should be from Mill Road only;</li> <li>○ Access to the site from other streets, particularly from Hooper</li> </ul> </li> </ul>

	<p>Street, Ainsworth Street, York Street, Milford Street or Sturton Street;</p> <ul style="list-style-type: none"> <li>○ Access to surrounding streets needs to be clarified as a part of any development;</li> <li>○ Impact on parking in the area, where there is already a shortage;</li> <li>○ Poor highway conditions locally will be exacerbated with safety impacts on pedestrians and cyclists;</li> <li>○ Inappropriately high density of dwellings proposed;</li> <li>○ Overloading of local community infrastructure, particularly education and primary healthcare;</li> <li>○ Impact on local drainage infrastructure;</li> <li>○ Light and noise pollution impacts will increase;</li> <li>○ Site should be developed by residents for residents – creation of a cooperative;</li> </ul> <ul style="list-style-type: none"> <li>● Conflict of interests as the council is both the landowner and developer;</li> <li>● Pigeon Land state that there is lack of evidence that the uses on site can be accommodated elsewhere and that this site is deliverable;</li> <li>● Consultation on the allocation was poor;</li> <li>● Need for trees and space next to Mill Road bridge to be maintained;</li> <li>● Need for land to be allocated within the site for the Chisholm Trail;</li> <li>● Development should include a mix of uses, including commercial development, market provision, small businesses;</li> <li>● Development higher than two storeys would overlook neighbouring properties;</li> <li>● Library building must be retained;</li> <li>● Impact of moving council services out of the city centre;</li> <li>● Add rear access/parking at the back of Kingston Street to the development site;</li> <li>● Impact on conservation area;</li> <li>● Need for guaranteed open space and community facilities, given Petersfield’s lack of open space;</li> <li>● Need for sufficient parking on site for development;</li> <li>● Make the whole site into a park, including pitch provision and a skate park for young people;</li> <li>● 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;</li> <li>● Need for a comprehensive masterplan for the site;</li> <li>● Need for affordable family housing, not flats;</li> <li>● Site should be used for provision of an ice rink;</li> </ul>
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	<ul style="list-style-type: none"> <li>• Make the development car-free and restrict occupiers' ability to park on neighbouring streets and have developers subsidise local bus tickets;</li> <li>• Garages are on long leases and are not available for development;</li> <li>• Loss of garages would put further pressure on car parking – alternative provision must be made or they must be retained;</li> <li>• Concern about a district energy centre being</li> <li>• Some respondents supported the allocation in principle, but were concerned about vehicular access from Hooper Street. Access should be from Mill Road only.</li> </ul>
<b>Support</b>	<ul style="list-style-type: none"> <li>• The landowner has supported the proposed allocation, dependent on the successful relocation of the uses currently on the site;</li> <li>• Supported on the basis of need for additional housing.</li> </ul>

<b>Site R11: Horizon Resource Centre, 285 Coldham's Lane</b>	
<b>Total Representations: 1</b>	
<b>Object: 1</b>	<b>Support: 0</b>
<b>Objections</b>	<ul style="list-style-type: none"> <li>• Site is a valuable resource for people with learning and physical disabilities and should not be lost.</li> </ul>
<b>Support</b>	Not applicable

<b>Site R12: Ridgeons, 75 Cromwell Road</b>	
<b>Total Representations: 88 (including a petition signed by 527 people)</b>	
<b>Object: 84 (including a petition signed by 527 people)</b>	<b>Support: 4</b>
<b>Objections</b>	<ul style="list-style-type: none"> <li>• 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;</li> <li>• Many objections sought to reduce the number of units proposed for the site – the proposed density is too high and does not reflect the density proposed at Issues and Options 2 stage (numerous respondents suggested alternative densities ranging from 30 to 45dph)</li> <li>• Many objections stated that development of the R12 Ridgeons site will: <ul style="list-style-type: none"> <li>○ Overload local infrastructure;</li> <li>○ Add to local traffic on an already congested transport network;</li> </ul> </li> </ul>

	<ul style="list-style-type: none"> <li>○ Cause noise pollution problems;</li> <li>○ Contribute to problems with highway and pedestrian safety, with more vehicles emerging onto Cromwell Road;</li> <li>○ Give rise to loss of jobs and the loss of an important builders merchant;</li> <li>○ Exacerbate problems already caused by Winstanley Court and Hampden Gardens;</li> <li>○ Impact on sewerage and flood risk;</li> <li>○ Impact on the adjacent conservation area;</li> <li>● Need for specified housing mix incorporating more affordable family homes with gardens, not flatted development;</li> <li>● Need for Environmental Impact Assessment and may be contrary to the Aarhus Convention</li> <li>● Need to provide community and leisure facilities, including medical and education provision;</li> <li>● Need for more accessible green space on site, including public open space and spaces which promote biodiversity;</li> <li>● 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;</li> <li>● The site should be part of an opportunity area;</li> <li>● A masterplan should be produced for the site;</li> <li>● Need for a pedestrian and cycle link over the railway line;</li> <li>● Need to include land for the delivery of the Chisholm Trail;</li> <li>● Need for sufficient parking on site for development;</li> <li>● Make the development car-free and restrict occupiers' ability to park on neighbouring streets;</li> <li>● Need to consider the soakaway within the site and adjacent to Winstanley Court;</li> <li>● Lack of provision for the elderly.</li> <li>● Site is too contaminated for residential use;</li> <li>● Site should be mixed use, with small businesses and local independent retail provision;</li> <li>● Cavendish Road should not be opened up to additional pedestrian or vehicular traffic.</li> </ul>
<b>Support</b>	<ul style="list-style-type: none"> <li>● Supported by landowner subject to a suitable alternative site being found to relocate existing builders' merchant use to. It is expected that the land will be made available within the plan period to 2031;</li> <li>● General support.</li> </ul>

<b>Site R14: BT telephone exchange and car park, Long Road</b>	
<b>Total Representations: 2</b>	
<b>Object: 0</b>	<b>Support: 2</b>
<b>Objections</b>	Not applicable
<b>Support</b>	<ul style="list-style-type: none"> <li>• General support</li> </ul>

<b>Site R16: Cambridge Professional Development Centre, Foster Road</b>	
<b>Total Representations: 6</b>	
<b>Object: 4</b>	<b>Support: 2</b>
<b>Objections</b>	<ul style="list-style-type: none"> <li>• 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;</li> <li>• Allocation will exacerbate existing traffic levels on Trumpington Road and surrounding side streets;</li> <li>• Site should form part of Fawcett School expansion;</li> <li>• Allocation will detrimentally affect adjacent housing for elderly and vulnerable people.</li> </ul>
<b>Support</b>	<ul style="list-style-type: none"> <li>• General support.</li> </ul>

<b>Site R17: Mount Pleasant House, Mount Pleasant</b>	
<b>Total Representations: 5</b>	
<b>Object: 4</b>	<b>Support: 1</b>
<b>Objections</b>	<ul style="list-style-type: none"> <li>• Landowner supports allocation of the land for residential development, but requests that the indicative capacity is increased to at least 87 units at 153dph;</li> <li>• Due to its proximity to existing Colleges, allocation should be amended to provide for student accommodation;</li> <li>• Allocation will exacerbate existing traffic levels in area;</li> <li>• Loss of employment use will impact on mix of uses and vitality of area.</li> </ul>
<b>Support</b>	<ul style="list-style-type: none"> <li>• General support.</li> </ul>

<b>Site M4: Police Station, Parkside</b>	
<b>Total Representations: 2</b>	
<b>Object: 2</b>	<b>Support: 0</b>
<b>Objections</b>	<ul style="list-style-type: none"> <li>• Police station needed to deal with crime in the centre;</li> <li>• All car parking for the development must be provided on site to prevent further impacts on neighbouring streets;</li> <li>• Adjacent site already overdeveloped.</li> </ul>
<b>Support</b>	Not applicable

<b>Site R40: Land north of Teversham Drift</b>	
<b>Total Representations: 9</b>	
<b>Object: 8</b>	<b>Support: 1</b>
<b>Objections</b>	<ul style="list-style-type: none"> <li>• Additional traffic impacts on highway safety;</li> <li>• Lack of infrastructure to accommodate rise in population, e.g. schools;</li> <li>• Loss of agricultural land;</li> <li>• Development close to the airport in the air safeguarding zone;</li> <li>• Adverse impact on biodiversity;</li> <li>• Coalescence of Cambridge with Teversham;</li> <li>• Negative impact on views.</li> <li>• Too much development in this area.</li> </ul>
<b>Support</b>	<ul style="list-style-type: none"> <li>• General support.</li> </ul>

<b>Site R41: Land north of Coldham's Lane</b>	
<b>Total Representations: 3</b>	
<b>Object: 3</b>	<b>Support: 0</b>
<b>Objections</b>	<ul style="list-style-type: none"> <li>• Marshall have objected to the site allocation as the development would compromise the safe operation of the airport;</li> <li>• Additional traffic impacts on highway safety;</li> <li>• Lack of infrastructure to accommodate rise in population, e.g. schools;</li> <li>• Development close to the airport in the air safeguarding zone;</li> <li>• Area provides open space between Cambridge and Cherry Hinton;</li> <li>• Negative impact on views;</li> </ul>

	<ul style="list-style-type: none"> <li>• Parking on Hatherdene Close will worsen;</li> <li>• Too much development in this area.</li> </ul>
<b>Support</b>	Not applicable

<b>Site R42a: Clay Farm south of Long Road</b>	
<b>Total Representations: 0</b>	
<b>Object: 0</b>	<b>Support: 0</b>
<b>Objections</b>	Not applicable
<b>Support</b>	Not applicable

<b>Site R42b: Trumpington Meadows</b>	
<b>Total Representations: 0</b>	
<b>Object: 0</b>	<b>Support: 0</b>
<b>Objections</b>	Not applicable
<b>Support</b>	Not applicable

<b>Site R42c: Glebe Farm 1 and 2</b>	
<b>Total Representations: 3</b>	
<b>Object: 2</b>	<b>Support: 1</b>
<b>Objections</b>	<ul style="list-style-type: none"> <li>• Density of Glebe Farm 2 is too high;</li> <li>• Allotments should be moved to buffer Shelford Road properties;</li> <li>• Cycle path along Exeter Close is impractical;</li> <li>• Restriction of vehicular access to Glebe farmhouse;</li> <li>• Loss of privacy;</li> <li>• Impact on biodiversity, particularly trees and hedgerows;</li> <li>• Additional traffic impact.</li> </ul>
<b>Support</b>	<ul style="list-style-type: none"> <li>• General support.</li> </ul>

<b>Site R42d: Bell School, Babraham Road</b>	
<b>Total Representations: 2</b>	
<b>Object: 1</b>	<b>Support: 1</b>
<b>Objections</b>	<ul style="list-style-type: none"> <li>• Need to overcome issues with the junction of the site with Babraham Road.</li> </ul>
<b>Support</b>	<ul style="list-style-type: none"> <li>• General support.</li> </ul>

<b>Site R43: NIAB 1</b>	
<b>Total Representations: 3</b>	
<b>Object: 2</b>	<b>Support: 1</b>
<b>Objections</b>	<ul style="list-style-type: none"> <li>• Additional traffic impacts on highway safety;</li> <li>• Concern about community infrastructure;</li> <li>• Concern about access to public transport;</li> <li>• Parking provision needs to be increased;</li> <li>• Impact on biodiversity;</li> <li>• Impact on quality of life.</li> </ul>
<b>Support</b>	<ul style="list-style-type: none"> <li>• General support.</li> </ul>

<b>Site R44: Betjeman House</b>	
<b>Total Representations: 2</b>	
<b>Object: 1</b>	<b>Support: 1</b>
<b>Objections</b>	<ul style="list-style-type: none"> <li>• 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).</li> </ul>
<b>Support</b>	<ul style="list-style-type: none"> <li>• General support.</li> </ul>

<b>Site R45: Land north of Newmarket Road</b>	
<b>Total Representations: 0</b>	
<b>Object: 0</b>	<b>Support: 0</b>
<b>Objections</b>	Not applicable
<b>Support</b>	Not applicable

<b>Site M1: 379 – 381 Milton Road</b>	
<b>Total Representations: 2</b>	
<b>Object: 2</b>	<b>Support: 0</b>
<b>Objections</b>	<ul style="list-style-type: none"> <li>• Landowner wants the site to be allocated as residential only, to be developed within the life of the plan;</li> <li>• Possible encroachment on Anglian Water pumping station requires early consultation with Anglian Water.</li> </ul>
<b>Support</b>	Not applicable.

<b>Site M2: Clifton Road Area</b>	
<b>Total Representations: 2</b>	
<b>Object: 2</b>	<b>Support: 0</b>
<b>Objections</b>	<ul style="list-style-type: none"> <li>• 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;</li> <li>• Loss of current office space in the Clifton Road area;</li> <li>• Harm to Cambridge cluster if businesses are not able to locate in central Cambridge.</li> </ul>
<b>Support</b>	Not applicable

<b>Site M3: Michael Young Centre, Purbeck Road</b>	
<b>Total Representations: 2</b>	
<b>Object: 2</b>	<b>Support: 0</b>
<b>Objections</b>	<ul style="list-style-type: none"> <li>• Greater clarity should be provided on the list of potential uses within the allocation;</li> <li>• Access from Purbeck Road is unsuitable.</li> </ul>
<b>Support</b>	Not applicable

<b>Site M5: 82 – 88 Hills Road and 57 – 63 Bateman Street</b>	
<b>Total Representations: 1</b>	
<b>Object: 1</b>	<b>Support: 0</b>
<b>Objections</b>	<ul style="list-style-type: none"> <li>• 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.</li> </ul>
<b>Support</b>	Not applicable

<b>Site R6: 636 – 656 Newmarket Road, Holy Cross Church, East Barnwell Community Centre and Meadowlands, Newmarket Road</b>	
<b>Total Representations: 2</b>	
<b>Object: 2</b>	<b>Support: 0</b>
<b>Objections</b>	<ul style="list-style-type: none"> <li>• Unsuitable site for 75 dwellings giving vehicular access onto the Newmarket Road.</li> </ul>
<b>Support</b>	Not applicable



<b>Site R21: 315-349 Mill Road and Brookfields</b>	
<b>Total Representations: 14</b>	
<b>Object: 13</b>	<b>Support: 1</b>
<b>Objections</b>	<ul style="list-style-type: none"> <li>• 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;</li> <li>• 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;</li> <li>• Masterplan required for this site and needs community consultation;</li> <li>• Development will need to enhance area;</li> <li>• Reduce density of the site;</li> <li>• Provide retail facilities on the site;</li> <li>• No further residential development in the area;</li> <li>• Family and affordable housing needed;</li> <li>• No student residential on the site, particularly not in lieu of affordable dwellings;</li> <li>• Open space provided on the site;</li> <li>• Impact on the conservation area;</li> <li>• Health centre is a valued amenity for the local area and should be retained;</li> <li>• Parking facilities will be negatively impacted;</li> <li>• More traffic will give rise to congestion;</li> <li>• Development will put pressure on existing retail resources with associated rise in deliveries.</li> </ul>
<b>Support</b>	Not applicable

<b>Site M13: West Cambridge Site</b>	
<b>Total Representations: 1</b>	
<b>Object: 1</b>	<b>Support: 0</b>
<b>Objections</b>	<ul style="list-style-type: none"> <li>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.</li> </ul>
<b>Support</b>	Not applicable

<b>Site M14: Station Road West</b>	
<b>Total Representations: 0</b>	
<b>Object: 0</b>	<b>Support: 0</b>
<b>Objections</b>	Not applicable
<b>Support</b>	Not applicable

<b>Site M15: Cambridge Biomedical Campus, including Addenbrooke's Hospital</b>	
<b>Total Representations: 1</b>	
<b>Object: 1</b>	<b>Support: 0</b>
<b>Objections</b>	<ul style="list-style-type: none"> <li>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";</li> <li>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;</li> </ul>
<b>Support</b>	Not applicable

<b>Site E4: Church End Industrial Estate, Rosemary Lane</b>	
<b>Total Representations: 2</b>	
<b>Object: 1</b>	<b>Support: 1</b>
<b>Objections</b>	<ul style="list-style-type: none"> <li>Object to further development in Cherry Hinton on basis of transport impacts.</li> </ul>
<b>Support</b>	<ul style="list-style-type: none"> <li>Support enhancement of local employment opportunities.</li> </ul>

<b>Site E5: 1 and 7- 11 Hills Road</b>	
<b>Total Representations: 2</b>	
<b>Object: 2</b>	<b>Support: 0</b>
<b>Objections</b>	<ul style="list-style-type: none"> <li>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;</li> <li>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);</li> <li>The use allocation should be changed to mixed residential and employment.</li> </ul>
<b>Support</b>	Not applicable

<b>Site GB3 &amp; GB4: Fulbourn Road, west 1 and 2</b>	
<b>Total Representations: 19 (including a petition signed by 2,025 people)</b>	
<b>Object: 16 (including a petition signed by 2,025 people)</b>	<b>Support: 3</b>
<b>Objections</b>	<ul style="list-style-type: none"> <li>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"> <li>lack of exceptional circumstances to justify release of Green Belt land;</li> <li>urban sprawl impacting on the historic and compact character of the city, its surrounding villages and countryside and impact on traffic congestion;</li> </ul> </li> </ul>

	<ul style="list-style-type: none"> <li>○ 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.</li> <li>● Commercial Estates Group objected to the site allocation on the basis of: <ul style="list-style-type: none"> <li>○ Insufficient evidence to demonstrate the deliverability and density of a number of allocated sites;</li> <li>○ Insufficient release of land to deliver housing and employment development to meet objectively assessed needs;</li> <li>○ Plans rely on infrastructure of high cost and uncertain delivery;</li> <li>○ Plans do not promote sustainable transport;</li> <li>○ Spatial distribution of development undermines the economic competitiveness of Cambridge;</li> <li>○ Need for a joint plan for Cambridge and South Cambridgeshire to deliver growth;</li> <li>○ Incorrect application of national Green Belt policy and flawed methodology for analysis of landscape value;</li> <li>○ Flawed sustainability appraisal of the plans;</li> <li>○ 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.</li> </ul> </li> <li>● 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"> <li>○ lack of local cycling facilities;</li> <li>○ the dangerous nature of local road junctions for cyclists and pedestrians alike;</li> <li>○ traffic congestion on already busy and narrow roads;</li> <li>○ the visual effect on the Gogs and local nature reserves; and</li> <li>○ the poor location to local services.</li> </ul> </li> <li>● Impact on residential properties on the neighbouring streets Tweedale and Ainsdale, in terms of noise, dust, loss of views and reduction in property value;</li> <li>● Loss of views;</li> <li>● Impact on landscape character;</li> <li>● Impact on highway safety on the neighbouring streets Tweedale and Ainsdale;</li> <li>● Impact on biodiversity;</li> <li>● Impact on the Green Belt;</li> <li>● Failure to comply with the need for exceptional circumstances to release Green Belt land;</li> <li>● Impact on inadequate local infrastructure;</li> </ul>
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	<ul style="list-style-type: none"> <li>• Impact on flood risk;</li> <li>• Impact on local roads which are already congested;</li> <li>• 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;</li> <li>• 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.</li> </ul>
<b>Support</b>	<ul style="list-style-type: none"> <li>• General support;</li> <li>• ARM Holdings plc. supports the proposed release of Green Belt sites GB3 and GB4, Fulbourn Road, west 1 and 2 for employment development.</li> <li>• Support on basis that visual impact on the local area will be minimised.</li> </ul>

<b>Site U1: Old Press/Mill Lane</b>	
<b>Total Representations: 2</b>	
<b>Object: 2</b>	<b>Support: 0</b>
<b>Objections</b>	<ul style="list-style-type: none"> <li>• Proposals would spoil whole area;</li> <li>• Impact on Little St Mary's Lane must be mitigated.</li> </ul>
<b>Support</b>	Not applicable

<b>Site U2: New Museums, Downing Street</b>	
<b>Total Representations: 1</b>	
<b>Object: 1</b>	<b>Support: 0</b>
<b>Objections</b>	<ul style="list-style-type: none"> <li>• 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.</li> </ul>
<b>Support</b>	Not applicable

<b>Site U3: Grange Farm off Wilberforce Road</b>	
<b>Total Representations: 6</b>	
<b>Object: 6</b>	<b>Support: 0</b>
<b>Objections</b>	<ul style="list-style-type: none"> <li>• Landowner wishes allocation to be amended to include “120 student units or other university related accommodation subject to detailed proposals”;</li> <li>• Site should be removed from plan;</li> <li>• Thorough survey of ecology must be undertaken due to its sensitivity in terms of the site itself and for the setting of the city;</li> <li>• 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;</li> <li>• Development would lead to the loss of old orchards;</li> <li>• Site is crossed by a Roman road;</li> <li>• Development would damage views into the city;</li> <li>• Development would increase risk of local flooding.</li> </ul>
<b>Support</b>	Not applicable

<b>Site RM1: Fen Road</b>	
<b>Total Representations: 4</b>	
<b>Object: 2</b>	<b>Support: 2</b>
<b>Objections</b>	<ul style="list-style-type: none"> <li>• 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;</li> <li>• The site should provide for residential use;</li> <li>• Site may not be achievable;</li> <li>• Site must have mains services with electricity supply to individual vessels.</li> </ul>
<b>Support</b>	<ul style="list-style-type: none"> <li>• General support.</li> </ul>

## Appendix C: Designations Schedule

<b>Appendix C: Designations Schedule (Representations submitted to Appendix C in general)</b>	
<b>Total Representations: 8</b>	
<b>Object: 7</b>	<b>Support: 1</b>
<b>Objections</b>	<ul style="list-style-type: none"> <li>• All designated heritage assets should be listed together so that it is clear that policy 61 applies to them;</li> <li>• 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;</li> <li>• 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);</li> <li>• 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;</li> <li>• 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;</li> <li>• Provide a list and map of the commons within Cambridge with ownership details.</li> </ul>
<b>Support</b>	<ul style="list-style-type: none"> <li>• Support for the protection of play space listed.</li> </ul>

<b>Appendix C – Conservation Areas</b>	
<b>Total Representations: 1</b>	
<b>Object: 1</b>	<b>Support: 0</b>
<b>Objections</b>	<ul style="list-style-type: none"> <li>• North Newtown is a conservation area, however, it is not listed.</li> </ul>
<b>Support</b>	Not applicable

<b>Appendix C – County Wildlife Site</b>	
<b>Total Representations: 1</b>	
<b>Object: 0</b>	<b>Support: 1</b>
	Not applicable
<b>Support</b>	<ul style="list-style-type: none"> <li>• Designation No. 15 – Worts’ Causeway Roadside Verge.</li> </ul>

<b>Appendix C – City Wildlife Sites</b>	
<b>Total Representations: 10</b>	
<b>Object: 1</b>	<b>Support: 9</b>
<b>Objections</b>	<ul style="list-style-type: none"> <li>• 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.</li> </ul>
<b>Support</b>	<ul style="list-style-type: none"> <li>• Designation: <ul style="list-style-type: none"> <li>○ No. 01 - Adams Road Sanctuary</li> <li>○ No. 11 - Cherry Hinton Brook</li> <li>○ No. 17 - Coldham's Lane Old Landfill Sites</li> <li>○ No. 18 - CU Officer Training Corps Pit</li> <li>○ No. 40 - Norman Cement Pits</li> <li>○ No. 48 - The Spinney and Hayster Open Space</li> </ul> </li> </ul>

<b>Appendix C – Neighbourhood, District and Local Centres</b>	
<b>Total Representations: 7</b>	
<b>Object: 6</b>	<b>Support: 1</b>
<b>Objections</b>	<ul style="list-style-type: none"> <li>• 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;</li> <li>• Designation No. 06 – Mitcham’s Corner District Centre – Amend the</li> </ul>



	<p>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;</p> <ul style="list-style-type: none"> <li>• 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;</li> <li>• 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;</li> <li>• Designation No. 04 Mill Road East District Centre – Delete the designation west of the junction of Ross Street and Romsey Terrace.</li> </ul>
<b>Support</b>	<ul style="list-style-type: none"> <li>• Designation No. 03 – Histon Road District Centre.</li> </ul>

<b>Appendix C – Protected Open Space</b>	
<b>Total Representations: 194</b>	
<b>Object: 167</b>	<b>Support: 27</b>
<b>Objections</b>	<ul style="list-style-type: none"> <li>• Lack of reference to amenities (including all weather meeting places) for young people;</li> <li>• Designation P&amp;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;</li> <li>• 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;</li> <li>• Local Plan will not alleviate acute shortage of Protected Open Space in Petersfield;</li> <li>• Designation A26 - Peverel Road Allotments - An alteration is required to allocate the site for B1 purposes;</li> <li>• Retain designation AGS05 - Donkey Common - as a protected green space and remove from the Opportunity Area;</li> <li>• Retain designation AGS12 - Peter's Field - as a protected green space</li> </ul>

	<p>and remove from the Opportunity Area;</p> <ul style="list-style-type: none"> <li>• Designation AGS60 - Westminster College - is based upon an inaccurate assessment of the recreational and environmental importance of the site;</li> <li>• Designation AGS62 - The Pightle and Principal's Lodge - will be highly restrictive to the development aspirations of Newnham College;</li> <li>• Designation NAT19 - Meadow Triangle near Wilberforce Road and Cycle Way - serves no Green Belt purpose or open space purpose;</li> <li>• Designation P&amp;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;</li> <li>• Designation P&amp;G22 - Coldham's Common - is not a Park and Garden, but an unenclosed common;</li> <li>• Designation P&amp;G29 - Magdalene College Grounds - is based upon an inaccurate assessment of the recreational and environmental importance of the site;</li> <li>• Designation P&amp;G37 - Ridley Hall Grounds - should be amended to simply identify the central lawned area of the quad;</li> <li>• Designation P&amp;G38 - Gonville and Caius Fellows Garden - is already protected within the Central Conservation Area designation and does not justify further protection;</li> <li>• Designation P&amp;G40 - Newnham College Gardens - will restrict the development aspirations of Newnham College;</li> <li>• Designation P&amp;G51 - Anstey Hall - the site assessment is factually incorrect;</li> <li>• Designation SPO06 - Cambridge Tennis and Hockey Club – the site should be allocated for residential development;</li> <li>• Designation SPO16 - Emmanuel College Playing Field - the site should be allocated for residential development;</li> <li>• Designation SPO33 - Newnham College Playing Field - will restrict the development aspirations of Newnham College;</li> <li>• 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;</li> <li>• Designation SPO62 - Perse Preparatory School – Potential expansion of local schools should be seen as an opportunity to enhance the quality of the provision.</li> </ul>
<b>Support</b>	<ul style="list-style-type: none"> <li>• Designation of: <ul style="list-style-type: none"> <li>○ AGS85 - Centre for Mathematical Sciences;</li> <li>○ NAT19 - Meadow Triangle near Wilberforce Road and Cycle Way;</li> </ul> </li> </ul>

	<ul style="list-style-type: none"> <li>○ P&amp;G08 - Histon Road Recreation Ground;</li> <li>○ P&amp;G27 - Cambridge University Botanic Garden;</li> <li>○ SPO02 – Cambridge City Football Club;</li> <li>○ SPO06 - Cambridge Tennis and Hockey Club;</li> <li>○ SPO16 - Emmanuel College Playing Field;</li> <li>○ SPO19 - Fitzwilliam College Playing Fields;</li> <li>○ SPO50 - Trinity College Playing Field;</li> <li>○ SPO52 - University Athletics Track.</li> </ul>
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<b>Appendix C – List of Protected Pubs</b>	
<b>Total Representations: 3</b>	
<b>Object: 1</b>	<b>Support: 2</b>
<b>Objections</b>	<ul style="list-style-type: none"> <li>● Until development actually occurs, the Greyhound (Coldham’s Lane), the Dog &amp; Pheasant (Chesterton High Street) and the Osborne Arms (Hills Road) should remain on the safeguarded list.</li> </ul>
<b>Support</b>	<ul style="list-style-type: none"> <li>● The Alma is a local centre;</li> <li>● Protect the Penny Ferry building and site.</li> </ul>

<b>Appendix D: Southern Fringe Area Development Framework</b>	
<b>Total Representations: 7</b>	
<b>Object: 5</b>	<b>Support: 2</b>
<b>Objections</b>	<ul style="list-style-type: none"> <li>● Appendix D needs to be significantly updated in the light of planning permissions secured, planning obligations requirements entered into and developments implemented;</li> <li>● 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;</li> <li>● 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;</li> <li>● 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;</li> <li>● Para D.21 should read: “Development of the Cambridge Southern</li> </ul>

	<p>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”;</p> <ul style="list-style-type: none"> <li>• 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.”</li> </ul>
<b>Support</b>	<ul style="list-style-type: none"> <li>• Support for the inclusion of the Southern Fringe Area Development Framework in the local plan;</li> <li>• Support for the community facilities to be provided;</li> <li>• Support for the recognition that there is nowhere suitable for a Household Recycling Centre in the Southern Fringe.</li> </ul>

<b>Appendix E: Roof Extensions design guide</b>	
<b>Total Representations: 0</b>	
<b>Object: 0</b>	<b>Support: 0</b>
<b>Objections</b>	Not applicable
<b>Support</b>	Not applicable

<b>Appendix F: Tall Buildings and the Skyline</b>	
<b>Total Representations: 8</b>	
<b>Object: 8</b>	<b>Support: 0</b>
<b>Objections</b>	<ul style="list-style-type: none"> <li>• Paragraph F.4 is ambiguous;</li> <li>• 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</li> <li>• 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</li> </ul>

	<p>the Varsity Hotel has enhanced the Cambridge skyline, particularly in views from Jesus Common.</p> <ul style="list-style-type: none"> <li>• 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;</li> <li>• Paragraph F.29 - All floors of tall buildings should be served by Part M Building Regulations lifts;</li> <li>• Request that the guidance is reviewed including criteria 1 (location), 2 (historic impact), 4 (Amenity) and 5 (public realm);</li> <li>• 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;</li> <li>• 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;</li> <li>• 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;</li> <li>• 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;</li> <li>• 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.</li> </ul>
<b>Support</b>	Not applicable.

<b>Appendix G: Local Heritage Assets Criteria and List</b>	
<b>Total Representations: 5</b>	
<b>Object: 4</b>	<b>Support: 1</b>
<b>Objections</b>	<ul style="list-style-type: none"> <li>• Appendix G should be amended to set out criteria for the designation of locally listed structures, features and gardens;</li> <li>• 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.</li> </ul>

	<p>Such criteria are not necessary given existing controls;</p> <ul style="list-style-type: none"> <li>• The process by which buildings can be 'locally listed' does not provide for rigorous and consistent designation of buildings;</li> <li>• Criterion G.3.a is too early. The date should be 1890 or 1900;</li> <li>• Open space between buildings should be safeguarded.</li> </ul>
<b>Support</b>	<ul style="list-style-type: none"> <li>• General support.</li> </ul>

<b>Appendix H: Shopfront Design Guide</b>	
<b>Total Representations: 3</b>	
<b>Object: 2</b>	<b>Support: 1</b>
<b>Objections</b>	<ul style="list-style-type: none"> <li>• 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;</li> <li>• 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.</li> </ul>
<b>Support</b>	<ul style="list-style-type: none"> <li>• Good design guide with useful illustrations.</li> </ul>

<b>Appendix I: Open Space and Recreation Standards</b>	
<b>Total Representations: 12</b>	
<b>Object: 8</b>	<b>Support: 4</b>
<b>Objections</b>	<ul style="list-style-type: none"> <li>• Lack of reference to amenities (including all weather meeting places) for young people;</li> <li>• Criteria omit: <ul style="list-style-type: none"> <li>○ Commons neither listed nor mapped. No reference made to their importance, their ownership a legal framework that protects them; and;</li> <li>○ the transport function of Protected Open Space;</li> </ul> </li> <li>• Provision for disabled people must be integral;</li> <li>• Green Belt sites satisfy protection under Protected Open Space assessment criteria.</li> </ul>
<b>Support</b>	<ul style="list-style-type: none"> <li>• Support for the criteria listed to assessment land for protection;</li> </ul>

	<ul style="list-style-type: none"> <li>Protected Open Space with potential for informal play.</li> </ul>
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<b>Appendix J: Biodiversity</b>	
<b>Total Representations: 2</b>	
<b>Object: 2</b>	<b>Support: 0</b>
<b>Objections</b>	<ul style="list-style-type: none"> <li>Planting within development should be native species and should be beneficial for wildlife species that occur in Cambridge;</li> <li>A list of suitable native species should be provided.</li> </ul>
<b>Support</b>	Not applicable

<b>Appendix K: Marketing, Local Needs Assessment and Viability Appraisal</b>	
<b>Total Representations: 3</b>	
<b>Object: 2</b>	<b>Support: 1</b>
<b>Objections</b>	<ul style="list-style-type: none"> <li>Simplification of marketing requirements;</li> <li>Requirements are a duplication of 'Community Right to Bid' provisions;</li> </ul>
<b>Support</b>	<ul style="list-style-type: none"> <li>Support for marketing requirements.</li> </ul>

<b>Appendix L: Car and cycle parking requirements</b>	
<b>Total Representations: 6</b>	
<b>Object: 5</b>	<b>Support: 1</b>
<b>Objections</b>	<ul style="list-style-type: none"> <li>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;</li> <li>Cycle standard for D1 Higher education staff should be amended for 1 in 3 members of staff;</li> <li>Not enough short stay parking or cycle parking is provided in new developments. Need to be more specific about levels of visitor parking;</li> <li>(Table L.10) Many dwellings will have more than one bike therefore provision in new development is too low;</li> <li>In the section on residential cycle parking, the text fails to recognise that</li> </ul>

	<p>a 1-bedroom flat could still have 2 people: standards are insufficient. Average 1.5 spaces across the development needed;</p> <ul style="list-style-type: none"> <li>• 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).</li> </ul>
<b>Support</b>	<ul style="list-style-type: none"> <li>• Support for the parking requirement for offices and general industry.</li> </ul>

<b>Appendix M: Monitoring and Implementation</b>	
<b>Total Representations: 3</b>	
<b>Object: 3</b>	<b>Support: 0</b>
<b>Objections</b>	<ul style="list-style-type: none"> <li>• 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;</li> <li>• 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;</li> <li>• Need for strong statement to the effect that the council will seek to enforce obligations given by developers.</li> </ul>
<b>Support</b>	Not applicable.

<b>Glossary</b>	
<b>Total Representations: 2</b>	
<b>Object: 2</b>	<b>Support: 0</b>
<b>Objections</b>	<ul style="list-style-type: none"> <li>• Definitions in the glossary need to be tightened;</li> <li>• Definition for 'dwelling' needs to be included;</li> <li>• 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</li> </ul>



	listed buildings.
<b>Support</b>	Not applicable

## Sustainability Appraisal

<b>Section: 1 - Background</b>	
<b>Total Representations: 1</b>	
<b>Object: 1</b>	<b>Support: 0</b>
<b>Objections</b>	<ul style="list-style-type: none"> <li>• 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.</li> <li>• Pigeon Land has submitted a critique of the Sustainability Appraisal of the Submission Draft Local Plan, which concludes: <ul style="list-style-type: none"> <li>○ The Submission Draft Local Plan is not compliant with the NPPF since it is not delivering the most sustainable development strategy;</li> <li>○ The Submission Draft Local Plan does not comply with the requirements of Sustainability Appraisal and is not therefore sound;</li> <li>○ 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';</li> <li>○ 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;</li> <li>○ 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;</li> <li>○ 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;</li> <li>○ 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;</li> <li>○ Undue weight has been given to the importance of the Green Belt considerations in the Sustainability Appraisal, which has in effect skewed the conclusions.</li> <li>○ The Cambridge South site (Broad Location 5) has incorrectly been</li> </ul> </li> </ul>

	<p>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;</p> <ul style="list-style-type: none"> <li>○ 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;</li> <li>○ 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.</li> </ul>
<b>Support</b>	<ul style="list-style-type: none"> <li>● Not applicable.</li> </ul>

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

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

	<p>critical options; 'no development on the urban edge of Cambridge' and 'limited development on the edge of Cambridge';</p> <ul style="list-style-type: none"> <li>○ 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;</li> <li>○ 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;</li> <li>○ 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;</li> <li>○ 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;</li> <li>○ Undue weight has been given to the importance of the Green Belt considerations in the Sustainability Appraisal, which has in effect skewed the conclusions.</li> <li>○ 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;</li> <li>○ 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;</li> <li>○ 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.</li> </ul> <ul style="list-style-type: none"> <li>● 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</li> </ul>
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	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.
<b>Support</b>	Not applicable.

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

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

<b>Section: 26.4 – Conclusions and Recommendations</b>	
<b>Total Representations: 1</b>	
<b>Object: 1</b>	
<b>Support: 0</b>	
<b>Objections</b>	<ul style="list-style-type: none"> <li>Elements of the Sustainability Appraisal, including on releasing Green Belt sites for development and meeting sufficient land to meet housing</li> </ul>

	needs, need to be reassessed to meet the requirements of the European Directive 2001/42/EC. Reassessment must consider sites at Cambridge South East.
<b>Support</b>	Not applicable.

<b>Section: Part 4 – What are the next steps (including monitoring)?</b>	
<b>Total Representations: 1</b>	
<b>Object: 1</b>	<b>Support: 0</b>
<b>Objections</b>	<ul style="list-style-type: none"> <li>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.</li> </ul>
<b>Support</b>	Not applicable.

<b>Sustainability Appraisal – Non Technical Summary</b>	
<b>Total Representations: 1</b>	
<b>Object: 1</b>	<b>Support: 0</b>
<b>Objections</b>	<ul style="list-style-type: none"> <li>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.</li> <li>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.</li> </ul>
<b>Support</b>	Not applicable.

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Cambridge Local Plan 2014: Submission

Statement of Compliance with the 'Duty to Cooperate'

December 2013





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## **1. Introduction**

- 1.1 Cambridge City Council has produced the Cambridge Local Plan 2014: Submission document which will replace the Cambridge Local Plan 2006 and sets out policies and proposals for future development and spatial planning requirements to 2031.
- 1.2 The Localism Act 2011 and the National Planning Policy Framework (NPPF) place a duty on local planning authorities and other bodies to cooperate with each other to address strategic issues relevant to their areas. The duty requires on-going constructive and active engagement on the preparation of development plan documents and other activities relating to the sustainable development and use of land, in particular in connection with strategic infrastructure.
- 1.3 The NPPF (paragraph 181) states that ‘Local planning authorities will be expected to demonstrate evidence of having successfully cooperated to plan for issues with cross-boundary impacts when their Local Plans are submitted for examination.’ The NPPF (paragraph 181) continues by advising that evidence of cooperation can take the form of ‘plans or policies prepared as part of a joint committee, a memorandum of understanding or a jointly prepared strategy which is presented as evidence of an agreed position.’
- 1.4 This report accompanies the submission of the Cambridge Local Plan 2014 and seeks to demonstrate how the council has complied with the ‘Duty to Cooperate’ in preparing the local plan.

## **2. Context**

- 2.1 Section 110 of the Localism Act 2011 introduces a new Section 33A to the Planning and Compulsory Purchase Act 2004, namely a ‘Duty to Cooperate.’ This duty requires planning authorities to work with other neighbouring authorities and other ‘prescribed bodies’ on preparing development plan documents or activities which facilitate the preparation of development plans. Section 110 is reproduced in Annex A to this report.
- 2.2 The full list of prescribed bodies are set out in the Act itself and in the subsequent Part 2 of the Town and Country Planning (Local Planning) (England) Regulations 2012. For Cambridge City Council, they are as follows:
  - Cambridgeshire County Council;
  - South Cambridgeshire District Council;
  - East Cambridgeshire District Council;
  - Environment Agency;
  - English Heritage (Historic Buildings and Monuments Commission for England);
  - Natural England;
  - Civil Aviation Authority;

- Homes and Communities Agency;
- Primary Care Trust (Cambridgeshire) (to March 2013 – now replaced by Cambridgeshire and Peterborough Clinical Commissioning Group)
- Office of Rail Regulation;
- Highways Agency;
- Marine Management Organisation;
- Local Enterprise Partnership (Greater Cambridgeshire – Greater Peterborough LEP).

2.3 Legally, the Duty to Cooperate could also be argued to apply to a number of other organisations including the Mayor of London and Transport for London. However, in light of the requirement in the Act to maximise the effectiveness of preparing the local plan, it has been decided that it would be unnecessary to actively seek cooperation with the aforementioned bodies.

2.4 A crucial element of the Act is found in the last part of Section 33A (3) which only requires the Duty to Cooperate to take place on relevant activities “so far as relating to a strategic matter.” The Act then defines this in Section 33A (4) as:

(a) sustainable development or use of land that has or would have a significant impact on at least two planning areas, including (in particular) sustainable development or use of land for or in connection with infrastructure that is strategic and has or would have a significant impact on at least two planning areas; and

(b) sustainable development or use of land in a two-tier area if the development or use—

(i) is a county matter, or

(ii) has or would have a significant impact on a county matter.

2.5 The NPPF, which was published in March 2012, describes the ‘duty to cooperate’, sets out strategic issues where cooperation might be appropriate, and highlights the importance of joint working to meet development requirements that cannot be wholly met within a single local planning area.

2.6 Paragraph 17 of the NPPF sets out the strategic issues where cooperation might be appropriate. Paragraph 156 of the NPPF also identifies strategic priorities, such as housing and economic development requirements, the provision of transport, energy, water supply, other major infrastructure, and climate change mitigation where it would be appropriate for cooperation to occur.

2.7 Paragraph 178 to 181 of the NPPF gives guidance on ‘*planning strategically across local boundaries*’, and highlights the importance of joint working to meet development requirements that cannot be wholly met within a single local planning area, through either joint planning policies or informal strategies such as infrastructure and investment plans. This guidance is set out in Figure 1 below.

Where text is emphasised in bold mid-sentence, this replicates the text exactly as shown in the NPPF.

**Figure 1 – Extract from NPPF: Planning strategically across local boundaries**

<b>Planning strategically across local boundaries</b>	
178	Public bodies have a duty to cooperate on planning issues that cross administrative boundaries, particularly those which relate to the <b>strategic priorities</b> set out in paragraph 156. The Government expects joint working on areas of common interest to be diligently undertaken for the mutual benefit of neighbouring authorities.
179	Local planning authorities should work collaboratively with other bodies to ensure that strategic priorities across local boundaries are properly coordinated and clearly reflected in individual Local Plans. Joint working should enable local planning authorities to work together to meet development requirements which cannot wholly be met within their own areas – for instance, because of a lack of physical capacity or because to do so would cause significant harm to the principles and policies of this Framework. As part of this process, they should consider producing joint planning policies on strategic matters and informal strategies such as joint infrastructure and investment plans.
180	Local planning authorities should take account of different geographic areas, including travel-to-work areas. In two tier areas, county and district authorities should cooperate with each other on relevant issues. Local planning authorities should work collaboratively on strategic planning priorities to enable delivery of sustainable development in consultation with Local Enterprise Partnerships and Local Nature Partnerships. Local planning authorities should also work collaboratively with private sector bodies, utility and infrastructure providers.
181	Local planning authorities will be expected to demonstrate evidence of having effectively cooperated to plan for issues with cross-boundary impacts when their Local Plans are submitted for examination. This could be by way of plans or policies prepared as part of a joint committee, a memorandum of understanding or a jointly prepared strategy which is presented as evidence of an agreed position. Cooperation should be a continuous process of engagement from initial thinking through to implementation, resulting in a final position where plans are in place to provide the land and infrastructure necessary to support current and projected future levels of development.

- 2.8 There are two tests of soundness for plan making in the NPPF (paragraph 182) which relate directly to the Duty to Cooperate:
- *Positively prepared* – the plan should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development.
  - *Effective* – the plan should be deliverable over its period and based on effective joint working on cross-boundary strategic priorities.

### **3. Evidence to demonstrate compliance with the Duty to Cooperate**

- 3.1 This part of the report is split into a number of sub-sections. It first sets out the overarching context of how Cambridge City Council has worked jointly with other Cambridgeshire authorities and with its close neighbour, South Cambridgeshire District Council. It then goes on to consider cooperation with other Section 110 bodies and organisations not specifically referenced under the Duty to Cooperate but who nevertheless have an important role to play in identifying strategic priorities for consideration in the Cambridge Local Plan 2014. Consideration is given to the identification of the main strategic planning priorities identified in paragraph 156 of the NPPF throughout this section.

#### **JOINT WORKING ACROSS THE CAMBRIDGESHIRE AUTHORITIES**

##### **Overarching Evidence – Statements at County Level (up to 2012)**

- 3.2 The Cambridgeshire districts have a long track record of cooperation, including working together on Structure Plans and presenting evidence to Regional Spatial Strategies (RSSs). More recently, during the revocation of Structure Plans and RSSs<sup>1</sup>, joint statements were issued on the development strategy for Cambridgeshire. The first statement was issued in November 2010 – see Annex B. After the NPPF was issued in March 2012, this statement was refreshed in July 2012. It can be found at Annex C. Cambridge City Council has been fully involved and has signed up to both of these statements.

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<sup>1</sup> The Regional Strategy for the East of England (Revocation) Order 2012 came into force on 3 January 2013. As such, the Regional Spatial Strategy for the East of England (East of England Plan) (2008), the Regional Economic Strategy (2008) and the remaining policies of the Cambridgeshire and Peterborough Structure Plan (2003) were revoked on this date.

## **Overarching Evidence – Cambridgeshire and Peterborough Joint Strategic Planning Unit (JSPU)**

- 3.3 Moving forward, the Cambridgeshire districts, plus Peterborough City Council, set up a 'Joint Strategic Planning Unit' in 2012, the purpose of which is to maintain the good joint strategic working across the county, and follows on from the strategic working previously undertaken by the now disbanded Cambridgeshire Horizons. The unit facilitates a (approximately) quarterly meeting (Cambridgeshire and Peterborough Joint Strategic Planning and Transport Member Group) of senior Members across all districts (three Members from each District, predominantly senior Members such as Portfolio leads for planning and transport). It had its first meeting in July 2012. The terms of reference for the strategic unit and joint Member meeting are at Annex D, and are available at the following weblink (where minutes and other updates can also be found):

<http://www.cambridgeshire.gov.uk/CMSWebsite/Apps/Committees/Committee.aspx?committeeID=61>

More local governance to help guide the development of local plans and the transport strategy for Cambridge City and South Cambridgeshire is provided by a Member level group called the Joint Strategic Transport and Spatial Planning Group.

### **Memorandum of Cooperation**

- 3.4 The Cambridgeshire local authorities, Peterborough City Council and the west Suffolk districts of Forest Heath and St Edmundsbury have agreed a Memorandum of Cooperation (Annex E). The Memorandum agreed by Cambridge City Council at Full Council on 27 June 2013, recognises 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 NPPF.
- 3.5 The Memorandum sets out the vision and objectives for the long-term development of Cambridgeshire and Peterborough, 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. It includes agreement on the objectively assessed housing needs for each of the districts in the Cambridge Sub-Region Housing Market Area and a continuation of the sustainable development strategy first set out in the 2003 Cambridgeshire and Peterborough Structure Plan.

- 3.6 The Memorandum refers to a second part which will address the main strategic spatial priorities identified in paragraph 156 of the NPPF. This second part was completed in November 2013 and was presented at the meeting of the Cambridgeshire and Peterborough Joint Strategic Planning and Transport Member Group on 18 November 2013.

#### **Further Joint Working with Cambridgeshire Authorities**

- 3.7 Cambridge City Council has undertaken a wide range of engagement, discussion and joint working with local authorities and other public organisations to ensure that there has been a high level of cooperation in the preparation of the local plan which goes beyond the duty to cooperate in the Localism Act and the NPPF.
- 3.8 Cambridge City Council has a long history of joint working with other local planning authorities in Cambridgeshire on strategic planning priorities that mirror those set out in paragraph 156 of the NPPF. The Cambridgeshire authorities have worked together on key strategic and joint issues at both officer and Member level through the preparation of structure plans, input to regional spatial strategies, and the review of the regional spatial strategy that reached draft plan stage before the Government announced that regional spatial strategies were to be abolished. The Joint Strategic Planning Unit set up in 2012 has ensured a continuation of this coordinated approach to strategic planning. On behalf of the Cambridgeshire and Peterborough authorities, the unit has undertaken a review of the Development Strategy for Cambridgeshire, drawing on evidence from the Cambridgeshire Development Study (2009), commissioned as part of the now abandoned review of the East of England Plan. The study concluded that the sustainable development sequence established in earlier regional plans, the 2003 Cambridgeshire and Peterborough Structure Plan and the Cambridge Local Plan 2006 remains the most sustainable development strategy with which to guide Cambridgeshire authorities in their local plan reviews.
- 3.9 At an officer level, work is steered by regular meetings of senior officers from across the County via the Public Service Board and the Chief Planning Officers' Group and regular meetings of the Planning Policy Forum, which comprises planning policy managers from all of the Cambridgeshire Districts (plus Peterborough). These meetings have been used to discuss strategic issues that affect more than one local authority, such as housing and employment needs, transport, waste, environment and biodiversity and provision for gypsies and travellers, helping to inform the development of local plans.
- 3.10 The Cambridgeshire councils commissioned the Joint Strategic Planning Unit to prepare a technical report that supports the Strategic Housing Market Assessment (SHMA) on development needs and a Memorandum of Cooperation and the spatial approach for Cambridgeshire and Peterborough, which demonstrates the coordinated approach to planning for the long term objectively assessed needs of



the wider area. This was agreed by the councils in May 2013, and can be found at Annex E.

- 3.11 A SHMA has been prepared and updated for the housing market area for a number of years, involving a core group of local authorities, namely:
- Cambridge City Council;
  - South Cambridgeshire District Council;
  - Cambridgeshire County Council;
  - Huntingdonshire District Council;
  - Fenland District Council
  - East Cambridgeshire District Council;
  - St Edmundsbury Borough Council; and
  - Forest Heath District Council.

Following the publication of the NPPF in March 2012, the SHMA methodology has been adapted to provide the objectively assessed needs for housing and jobs for the period to 2031.

- 3.12 A similar approach was taken with the SHMA local authorities plus West Norfolk and King's Lynn Borough Council to undertake a Gypsy and Travellers Accommodation Needs Assessment (GTANA) to identify the objectively assessed need for each district's gypsy and traveller population.

#### **Specific Joint Working with South Cambridgeshire District Council and Cambridgeshire County Council**

- 3.13 The functional geographical context of Cambridge surrounded by South Cambridgeshire District Council has led to the two councils working particularly closely on a variety of planning matters over many years. This work has included the preparation of current development plans, including two joint Area Action Plans for major developments on the edge of Cambridge. Whilst Cambridge City Council and South Cambridgeshire District Council are preparing separate local plans, this has not prevented a comprehensive approach being developed and sound arrangements have been put in place in order to ensure this. The councils have worked jointly to ensure that cross boundary issues and relevant wider matters are addressed in a consistent and joined up manner. At a Member level, a Joint Strategic Transport and Spatial Planning Group has been set up specifically to address issues affecting Cambridge and South Cambridgeshire, comprising Members from Cambridge City, South Cambridgeshire District and Cambridgeshire County Councils. This group first met on 29 March 2012. Minutes and agenda items are available at <http://www.cambridgeshire.gov.uk/CMSWebsite/Apps/Committees/Committee.aspx?committeeID=58>. The terms of reference are available at Annex F to this document. Senior Officers from the three councils also undertake regular meetings to ensure coordination of the two local plans and the associated transport strategy.

- 3.14 Cambridge City Council and South Cambridgeshire District Council have been working together throughout the preparation of the Issues and Options, Issues and Options 2 and Proposed Submission consultations on the Cambridge Local Plan and South Cambridgeshire Local Plan, and also together with Cambridgeshire County Council on 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 was also taken for the Issues and Options 2 consultation in January/February 2013, with the Part 1 consultation document being a joint consultation by Cambridge City and South Cambridgeshire District Councils.
- 3.15 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 consultations.
- 3.16 In order to inform the development of local plans, Cambridge City Council has jointly commissioned a number of evidence base documents with South Cambridgeshire District Council on a wide variety of topics. This includes a review of the inner boundary of the Cambridge Green Belt, and on aspects of the Sustainability Appraisal process, including a joint Sustainability Appraisal of the development strategy covering Cambridge and South Cambridgeshire. There has also been close working by the two councils with Cambridgeshire County Council, in particular on the transport modelling of the development options for the local plans and Cambridgeshire County Council's preparation of a new Transport Strategy for Cambridge and South Cambridgeshire.
- 3.17 The two councils have also worked together in the preparation of Infrastructure Delivery Studies commissioned as part of the delivery of the current Local Development Framework and in identifying the infrastructure required for the delivery of the new Local plan and testing viability. These studies have coordinated information gathering from infrastructure providers to ensure that information being given to each authority is consistent, and to advise on the development of Infrastructure Delivery Plans and implementation of Community Infrastructure Levy (CIL).
- 3.18 Other evidence base documents that have been produced jointly with South Cambridgeshire District Council and other Cambridgeshire authorities include:
- The Employment Land Review (2008) and update (2012);
  - The Cambridge Cluster at 50 Study (2010);
  - The Cambridge Sub Region Retail Study (2008);

- North West Cambridge Retail Study (2010);
- Cambridge and South Cambridgeshire Level 1 Strategic Flood Risk Assessment (2010);
- Cambridge and Milton Surface Water Management Plan (2011);
- Inner Green Belt Boundary Study (December 2012);
- Major Sports Facilities Strategy for the Cambridge Sub Region (2005);
- Arts and Culture Strategy for the Cambridge Sub-Region (2006);
- Cambridge Community Stadium Feasibility Study (2007);
- Balanced and Mixed Communities: A Good Practice Guide (2008);
- Cambridge Northern Fringe East Viability Study (2008);
- Water Cycle Strategy (2008 and 2011);
- Cambridgeshire Green Infrastructure Strategy (2011);
- Cambridgeshire Renewables Infrastructure Framework (2012);
- Cambridgeshire Community Energy Fund (2012).

### **Consultation with Cambridgeshire authorities in the preparation of the Local Plan**

- 3.19 In addition to all of the joint working undertaken in preparing new local plans across Cambridgeshire, Cambridge City Council has also carried out direct consultation with the wider Cambridgeshire authorities at each stage in plan making (i.e. during the Issues and Options, Issues and Options 2 and Draft Submission consultations).

### **Cooperation with other Section 110 bodies**

- 3.20 Consultation and engagement with the other Section 110 bodies has also been carried out throughout the Local Plan Review, at both statutory and non-statutory stages, as summarised in Table 1 below. This engagement began as part of the early stages of developing the new plan, while the council was undertaking the compilation of the evidence base for the plan. This work involved the completion of studies as well as working with key stakeholders, organisations and groups across the city. Details of the evidence base for the draft Cambridge Local Plan 2014 can be found by visiting the background documents page of the council's website: <https://www.cambridge.gov.uk/background-documents>
- 3.21 A series of workshops were also held between December 2011 and February 2012 with councillors, stakeholders including the Environment Agency, the Highways Agency, Natural England and English Heritage, developers, agents and residents' associations. The purpose of these workshops was to explain how the Local Plan would be prepared, to encourage people to get involved from an early stage and to discuss issues and concerns. Written reports of these workshops can be found by visiting <https://www.cambridge.gov.uk/about-the-local-plan-review>.
- 3.22 A series of one-to-one meetings were also offered and held with various organisations in order to help us understand future needs and concerns. The issues identified as part of these workshops and one-to-one meetings, alongside the evidence base developed as part of the background studies, were then incorporated

into the development of the “Cambridge Local Plan Towards 2031 – Issues and Options Report”. Of the Section 110 bodies, one-to-one meetings were requested by and held with the Highways Agency and English Heritage. Where appropriate, some of the Section 110 bodies have also been engaged with by the council during the drafting of policies, notably the Environment Agency and English Heritage.

- 3.23 Broadly speaking, where comments have been made by the other Section 110 bodies, these have been supportive of the overarching development strategy and housing and employment figures included within the draft Local Plan. There have been some areas within detailed policies where some changes to the plan have been sought, which is dealt with in more detail within the Statement of Consultation and associated audit trails for policy development.
- 3.24 The Cambridgeshire Local Nature Partnership (Greater Cambridgeshire LNP) is in its early days of formation, but has an excellent base to work from in the form of the Cambridgeshire Green Infrastructure Strategy (2011), which was prepared with considerable cooperation between the Cambridgeshire authorities and other parties. Nevertheless, despite the early stages of the LNP, a statement has been agreed between all the districts and the Board of the LNP, which clarified the cooperation we all have with the LNP. A copy of this statement is contained within Annex G. Members of the Greater Cambridgeshire LNP, notably the Wildlife Trust, have also been consulted throughout the preparation of the local plan.
- 3.25 Close working has also been carried out with other non-public sector service providers. The council has worked very closely with Cambridge Water on the development of its water efficiency policy, with the council’s approach informing the development of the Cambridge Water Resources Management Plan and vice versa. A letter of support for the Proposed Submission Plan from Cambridge Water can be found in Annex H. Engagement with Anglian Water, who are responsible for waste water treatment has also led to their support to water conservation, flood risk management and service provision, and they have advised that there are no insurmountable issues with sewerage infrastructure.
- 3.26 Sport England has also been consulted throughout the preparation of the Local Plan, having attended a workshop in January 2012, and a one-to-one meeting in February 2012. Following on from these meetings, and in addition to being consulted on the Issues and Options, Issues and Options 2 and Draft Submission Plan, they have also been involved in the drafting of the council’s policies related to the protection of existing and provision of new sports facilities.

**Table 1:** Summary of Consultation and Engagement with Section 110 Bodies

NAME OF SECTION 110 BODY	NATURE OF COOPERATION
South Cambridgeshire District Council	<ul style="list-style-type: none"> <li>• Coordination of local plan timetables and public consultation;</li> <li>• Joint Sustainability Appraisal of the two</li> </ul>

NAME OF SECTION 110 BODY	NATURE OF COOPERATION
	<p>authorities' development strategies;</p> <ul style="list-style-type: none"> <li>• Production of and consultation on the "Issues and Options 2 Part 1 – Joint Consultation on Development Strategy and Site Options on the Edge of Cambridge" document;</li> <li>• Continuous informal discussions and representations to formal consultation stages;</li> <li>• Memorandum of Cooperation for the Cambridgeshire Authorities;</li> <li>• Cambridge and South Cambridgeshire Joint Transport and Spatial Planning Group of Members to discuss key strategic issues;</li> <li>• Discussions at Chief Planning Officers' meetings;</li> <li>• Discussions at Planning Policy Forum meetings;</li> <li>• Fortnightly meetings of senior officers from Cambridge City Council, South Cambridgeshire District Council and Cambridgeshire County Council;</li> <li>• Engagement at County Infrastructure Delivery Group and CIL Working Group;</li> <li>• Joint working on the identification of objectively assessed development needs;</li> <li>• Joint working on the need for Gypsy and Traveller accommodation;</li> <li>• Joint commissioning of and officer input into the production of evidence base studies;</li> <li>• Joint commissioning of the Infrastructure Delivery Study;</li> <li>• Joint exhibitions during statutory consultations.</li> </ul>
Cambridgeshire County Council	<ul style="list-style-type: none"> <li>• Memorandum of Cooperation for the Cambridgeshire Authorities;</li> <li>• Cambridge and South Cambridgeshire Joint Transport and Spatial Planning Group of Members to discuss key strategic issues;</li> <li>• Continuous informal discussions and representations to formal consultation stages;</li> <li>• Discussions at Chief Planning Officers' meetings;</li> <li>• Discussions at Planning Policy Forum meetings;</li> <li>• Participation in the development of the</li> </ul>

NAME OF SECTION 110 BODY	NATURE OF COOPERATION
	<p>Infrastructure Delivery Study;</p> <ul style="list-style-type: none"> <li>• Transport modelling and development of the Transport Strategy;</li> <li>• Discussions concerning infrastructure provision for the development sites;</li> <li>• Joint exhibitions during statutory consultations;</li> <li>• Joint commissioning of and officer input into the production of evidence base studies.</li> </ul>
Other neighbouring district councils	<ul style="list-style-type: none"> <li>• Memorandum of Cooperation for the Cambridgeshire Authorities;</li> <li>• Continuous informal discussions and representations to formal consultation stages;</li> <li>• Discussions at Chief Planning Officers' meetings;</li> <li>• Discussions at Planning Policy Forum meetings;</li> <li>• Meetings of the Cambridgeshire and Peterborough Joint Planning and Transport Member Group to discuss key strategic issues;</li> <li>• Joint working on the identification of objectively assessed development needs in Cambridgeshire;</li> <li>• Joint working on the need for Gypsy and Traveller accommodation;</li> <li>• Joint commissioning of and officer input into the production of evidence base studies.</li> </ul>
Environment Agency	<ul style="list-style-type: none"> <li>• Early stakeholder engagement, including attendance of workshop and invitation to one-to-one meeting;</li> <li>• Consultation on the Sustainability Appraisal Scoping Report;</li> <li>• On-going involvement in the drafting of policy wording prior to formal consultation and on changes to policy wording following consultation;</li> <li>• Involvement in the production of evidence base documents including the Strategic Flood Risk Assessment, Water Cycle Strategy and Cambridge and Milton Surface Water Management Plan;</li> <li>• Statutory consultation.</li> </ul>
Highways Agency	<ul style="list-style-type: none"> <li>• Early stakeholder engagement, including attendance of workshop and one-to-one</li> </ul>

NAME OF SECTION 110 BODY	NATURE OF COOPERATION
	meeting; <ul style="list-style-type: none"> <li>• Statutory consultations.</li> </ul>
Primary Care Trusts and their Successors	<ul style="list-style-type: none"> <li>• Early stakeholder engagement and involvement in the drafting of policies;</li> <li>• Statutory consultation.</li> </ul>
English Heritage	<ul style="list-style-type: none"> <li>• Early stakeholder engagement, including attendance of workshop and one-to-one meetings;</li> <li>• Consultation on the Sustainability Appraisal Scoping Report;</li> <li>• On-going involvement in the drafting of policy wording prior to and following on from formal consultation, including meetings on 4<sup>th</sup> February 2013 and 27<sup>th</sup> September 2013;</li> <li>• Site visits around Cambridge (also involving senior officer from South Cambridgeshire District Council) on the 13<sup>th</sup> August 2013;</li> <li>• Statutory consultation.</li> </ul>
Natural England	<ul style="list-style-type: none"> <li>• Early stakeholder engagement, including attendance of workshop and invitation to one-to-one meeting;</li> <li>• Consultation on the Sustainability Appraisal Scoping Report;</li> <li>• Consultation on the Habitats Regulations Assessment Screening Report;</li> <li>• Statutory consultation.</li> </ul>
Civil Aviation Authority	<ul style="list-style-type: none"> <li>• Consultation on the Proposed Submission Draft Plan.</li> </ul>
Homes and Communities Agency	<ul style="list-style-type: none"> <li>• Early engagement including invitation to workshop and one-to-one meetings;</li> <li>• Statutory consultation.</li> </ul>
Office of the Rail Regulator	<ul style="list-style-type: none"> <li>• Consultation on the Proposed Submission Draft Plan.</li> </ul>
Marine Management Organisation	<ul style="list-style-type: none"> <li>• Consultation on the Proposed Submission Draft Plan.</li> </ul>
Greater Cambridgeshire Local Nature Partnership	<ul style="list-style-type: none"> <li>• Consultation with organisations making up the partnership prior to the official formation of the partnership;</li> <li>• Signing of a Statement of Cooperation</li> </ul>

## 4 CONCLUSION

4.1 Cambridge City Council has made considerable efforts to cooperate with a wide variety of stakeholders, not just those under the Duty to Cooperate. As this

statement confirms, Cambridge City Council is not aware of any outstanding Duty to Cooperate issues. As such, the council is confident that this legal duty has been fully met.



## Annex A: Section 110 of the Localism Act 2011

### **Duty to co-operate in relation to planning of sustainable development**

(1) In Part 2 of the Planning and Compulsory Purchase Act 2004 (local development) after section 33 insert—

#### **“33A Duty to co-operate in relation to planning of sustainable development**

(1) Each person who is—

- (a) a local planning authority,
- (b) a county council in England that is not a local planning authority, or
- (c) a body, or other person, that is prescribed or of a prescribed description,

must co-operate with every other person who is within paragraph (a), (b) or (c) or subsection (9) in maximising the effectiveness with which activities within subsection (3) are undertaken.

(2) In particular, the duty imposed on a person by subsection (1) requires the person—

- (a) to engage constructively, actively and on an ongoing basis in any process by means of which activities within subsection (3) are undertaken, and
- (b) to have regard to activities of a person within subsection (9) so far as they are relevant to activities within subsection (3).

(3) The activities within this subsection are—

- (a) the preparation of development plan documents,
- (b) the preparation of other local development documents,
- (c) the preparation of marine plans under the Marine and Coastal Access Act 2009 for the English inshore region, the English offshore region or any part of either of those regions,
- (d) activities that can reasonably be considered to prepare the way for activities within any of paragraphs (a) to (c) that are, or could be, contemplated, and
- (e) activities that support activities within any of paragraphs (a) to (c),

so far as relating to a strategic matter.

(4) For the purposes of subsection (3), each of the following is a “strategic matter”—

- (a) sustainable development or use of land that has or would have a significant impact on at least two planning areas, including (in particular) sustainable development or use of land for or in connection with infrastructure that is strategic and has or would have a significant impact on at least two planning areas, and
- (b) sustainable development or use of land in a two-tier area if the development or use—

(i) is a county matter, or

(ii) has or would have a significant impact on a county matter.

(5) [*this subsection defines “county matter”, “planning area”, “two-tier area” and is not repeated here*].

(6) The engagement required of a person by subsection (2)(a) includes, in particular—

(a) considering whether to consult on and prepare, and enter into and publish, agreements on joint approaches to the undertaking of activities within subsection (3), and

(b) if the person is a local planning authority, considering whether to agree under section 28 to prepare joint local development documents.

(7) A person subject to the duty under subsection (1) must have regard to any guidance given by the Secretary of State about how the duty is to be complied with.

(8) A person, or description of persons, may be prescribed for the purposes of subsection (1)(c) only if the person, or persons of that description, exercise functions for the purposes of an enactment.

(9) A person is within this subsection if the person is a body, or other person, that is prescribed or of a prescribed description.

(10) In this section—

“the English inshore region” and “the English offshore region” have the same meaning as in the Marine and Coastal Access Act 2009, and

“land” includes the waters within those regions and the bed and subsoil of those waters.”

## **Annex B: Joint Statement on the Development Strategy for Cambridgeshire by the Cambridgeshire Authorities – November 2010**

### **JOINT STATEMENT ON THE DEVELOPMENT STRATEGY FOR CAMBRIDGESHIRE BY THE CAMBRIDGESHIRE AUTHORITIES**

#### **1 Introduction**

- 1.1 This statement has been prepared by the Cambridgeshire authorities to set out our position regarding the development strategy for the County in light of the Government's recent announcement of the revocation of Regional Spatial Strategies and aspiration for a locally based planning system.
- 1.2 The Cambridgeshire authorities have a long history of joint working on planning issues and will continue to work together to share information and develop good practice. A significant evidence base has been built up that provides the authorities with important information to guide further work. An important outcome of this approach was the Cambridgeshire and Peterborough Structure Plan - a sustainable strategy for growth that was tested at Examination and adopted in 2003. This strategy was adopted largely unchanged in the Regional Spatial Strategy (2008) and the authorities' response to the RSS review in 2009. The Structure Plan strategy has also informed the development of the City and District Councils' Local Plan and Local Development Frameworks and is currently being implemented by the authorities through their development decisions.

#### **2 Cambridgeshire strategy**

- 2.1 The Cambridgeshire authorities remain committed to the strategy for planning in the County, including the provision of housing, as originally established by the Structure Plan and as now partially set out in saved Structure Plan policies and as reflected by the policies and site proposals in the Cambridge Local Plan and District Councils' Development Plan Documents and developing strategies for market towns.
- 2.2 The key objective of the strategy is to locate homes in and close to Cambridge, following a comprehensive review of the Cambridge Green Belt, and to other main centres of employment, while avoiding dispersed development which increases unsustainable travel and makes access to services and community facilities difficult. Further sustainable locations for growth focus mainly on Cambridgeshire's market towns.
- 2.3 This strategy makes provision for development:
- within Cambridge or as sustainable extensions to the urban area, subject to environmental capacity and compatibility with Green Belt objectives.
  - at the new town of Northstowe, linked to the guided busway;
  - within, or as sustainable extensions to, the market towns of Wisbech, March, Ely,

Huntingdon and St Neots, subject to the potential for regeneration and the provision of essential infrastructure and public transport improvements<sup>1</sup>; and

- within, or as extensions to, other market towns, where development would increase the towns' sustainability and self-containment, improvements to infrastructure and services are planned or will be provided and high quality public transport provision can reduce the impacts of out-commuting.

2.4 This strategy has met with considerable success so far and a large number of sites have already been delivered throughout the County or are under construction, with more remaining to be developed. Despite the recession, construction has continued and Cambridgeshire is identified as one of the key areas of the country likely to lead the national economy into recovery.

2.5 Despite recent announcements about the relocation of Marshalls from Cambridge airport, the authorities consider that Cambridge East retains great potential for sustainable development and currently remains part of the strategy. The authorities also consider that there is sufficient availability of housing land over the short to medium term. Cambridge East will be considered alongside other sites as part of a fuller review of the strategy.

### **3 Looking forward**

3.1 The Cambridgeshire authorities remain committed to the strategy for planning in the County outlined above, as embedded in the Cambridge Local Plan and District Councils' Development Plan Documents. However, with factors such as fragile economic growth, the need to rebalance the economy towards the private sector, changing demographic pressures, the challenges of climate change, uncertainty over infrastructure provision and emerging proposals for the Greater Cambridge and Greater Peterborough Local Enterprise Partnership, there remains a need to keep the strategy under review.

3.2 The authorities will continue to work together on place-shaping issues and will begin gathering evidence to inform decisions on future development levels and locations, so that the strategy that emerges will be based on a thorough understanding of the issues the County faces, including cross-County boundary impacts. Moves to a more locally based planning system will provide the authorities with much greater freedom. We will ensure that under this new system the future strategy is driven by the needs and aspirations of local communities, is fully deliverable, ensures the County's continuing economic success and protects and enhances Cambridgeshire's unique environment.

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<sup>1</sup> Huntingdon and St Neots in this policy refers to the Spatial Planning Areas as defined in the adopted Huntingdonshire Core Strategy.

## **Annex C: Updated Joint Statement on the Development Strategy for Cambridgeshire by the Cambridgeshire Authorities – July 2012**

### **JOINT STATEMENT ON THE DEVELOPMENT STRATEGY FOR CAMBRIDGESHIRE AND PETERBOROUGH BY THE LOCAL AUTHORITIES<sup>2</sup>**

#### **1 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 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 Cambridge's southern and north-west fringes and an application for a first phase for the new town of Northstowe has

<sup>2</sup> Cambridgeshire County Council, Cambridge City Council, East Cambridgeshire District Council, Fenland District Council, Huntingdonshire District Council, Peterborough City Council and South Cambridgeshire District Council.

been submitted. Major developments, essential regeneration and infrastructure provision in Cambridgeshire's market towns continue to make positive progress.

### **3 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 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

## **Annex D: Cambridgeshire and Peterborough Joint Strategic Planning and Transport Member Group Terms of Reference (as agreed in July 2012)**

### **Terms of Reference**

#### **Purpose**

The Group has been established to steer the development of joint strategic planning and transport work across Cambridgeshire & Peterborough, following the abolition of the requirement to produce any form of strategic spatial plan.

#### **Role and Outcomes**

The main role of the Group is to ensure that a coherent approach is taken to development strategies across Cambridgeshire and Peterborough and that the Duty to Co-operate is actively addressed.

The key outcomes from the Group will be:

- a) To steer the development of a non-statutory spatial framework for Cambridgeshire & Peterborough to at least 2031; and
- b) To steer the development of a long-term transport strategy for Cambridgeshire covering 2012 – 2050.

The Group will not have any formal decision-making powers. It will meet in public unless, exceptionally, it is agreed that matters of commercial or other sensitivity should be discussed in private.

#### **Membership**

The Group will consist of three Members from each of Cambridge City Council, Cambridgeshire County Council, East Cambridgeshire District Council, Fenland District Council, Huntingdonshire District Council, Peterborough City Council, and South Cambridgeshire District Council. Individual membership of the Group will be determined by each authority. Each authority should also nominate substitutes should the core participants not be able to attend particular meetings.

#### **Chair**

The Chairman will be nominated and elected at the first meeting. This role will be reconsidered annually, dependent on the overall timescales for achievement of the outcomes outlined above.

#### **Frequency of meetings**

The Group will meet initially in early July 2012. Following this, meetings will be quarterly



unless there are specific or exceptional reasons to meet more often.

**Secretariat**

The secretariat for the Group will be provided by the Joint Strategic Planning Unit. Meetings will be held at Cambridgeshire County Council's offices unless agreed otherwise.

# 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 tier<sup>1</sup>.

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”<sup>2</sup>. 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 NPPF<sup>3</sup>.

## 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 NPPF<sup>4</sup> (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.

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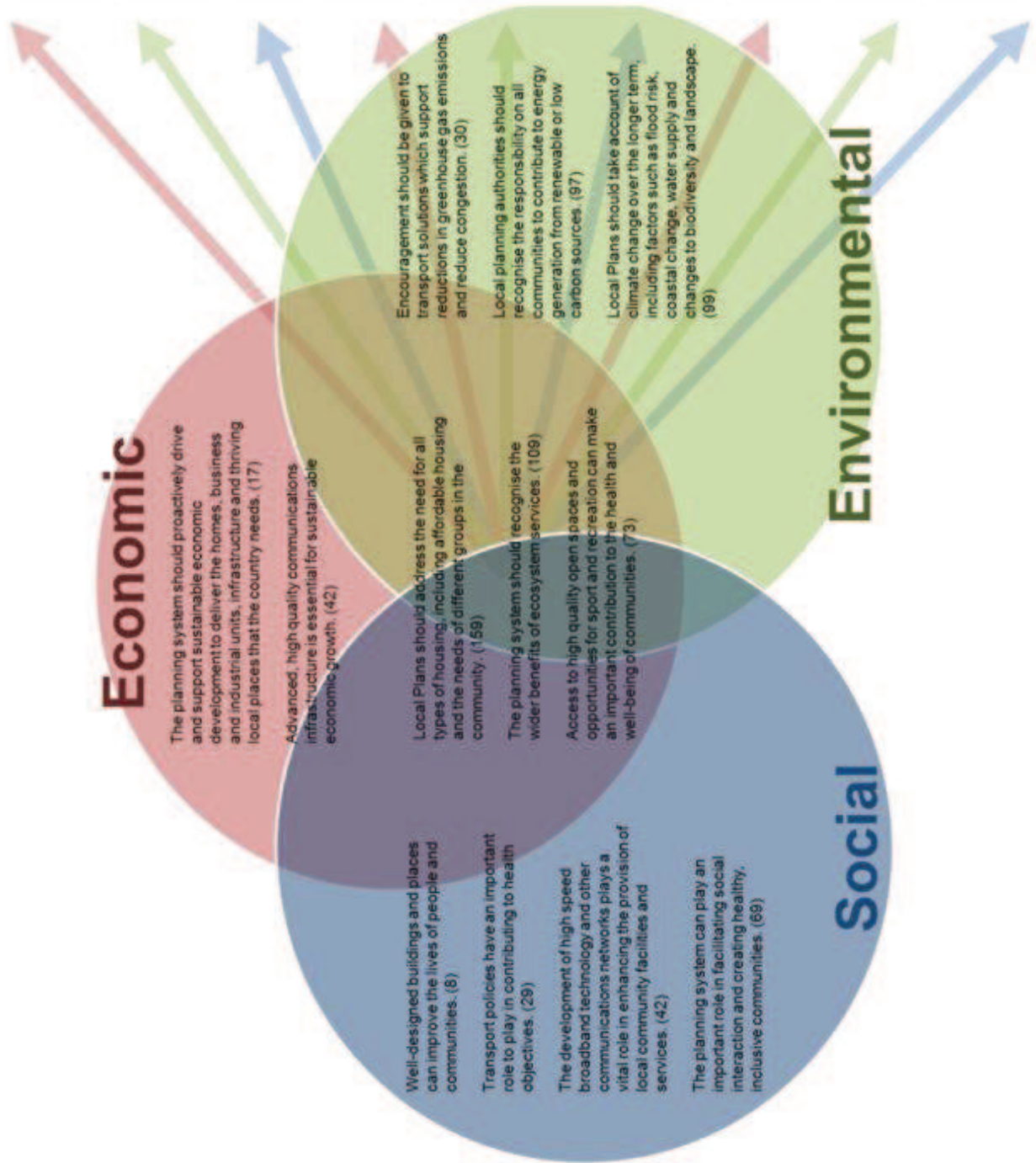
<sup>1</sup> The East of England Plan was revoked in January 2013.

<sup>2</sup> *National Planning Policy Framework*, paragraph 14.

<sup>3</sup> *Ibid*, paragraph 181.

<sup>4</sup> *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:

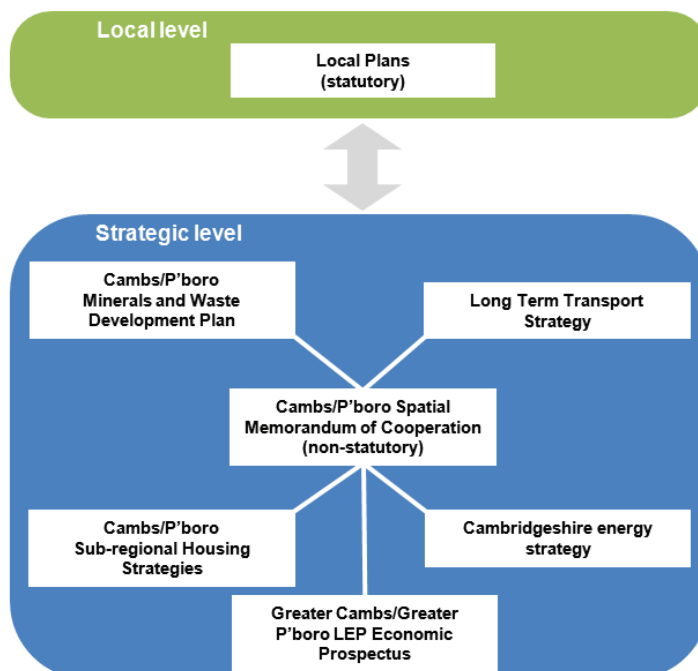
- Cambridge City Council
- Cambridgeshire County Council
- East Cambridgeshire District Council
- Fenland District Council
- Huntingdonshire District Council
- Peterborough City Council
- South Cambridgeshire District Council

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.

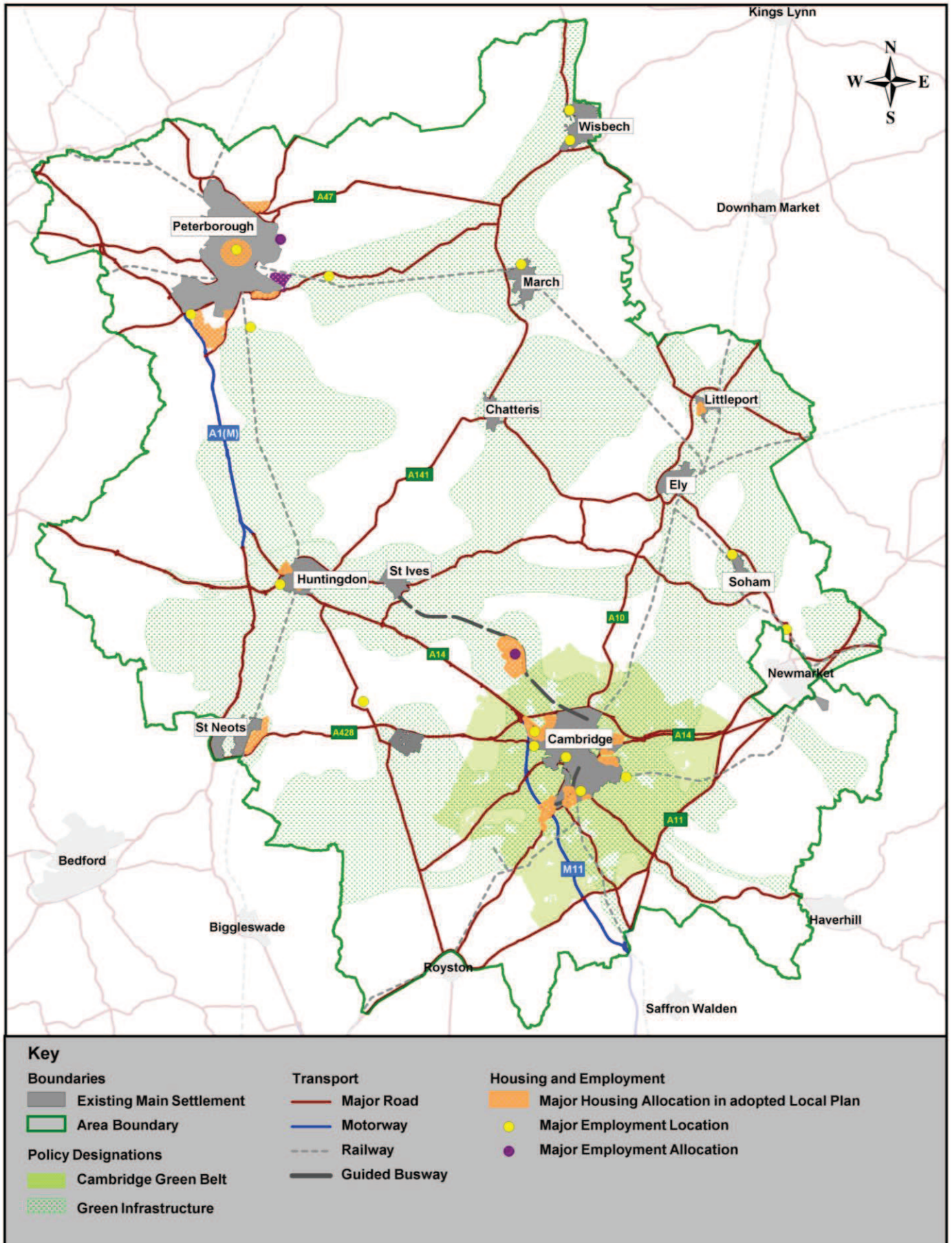
The area's economic strengths and related population growth have led to significant and continued pressure for growth over recent times. The development strategy established in the 2003 Structure Plan is currently being implemented, with major urban extensions and the new town of Northstowe coming forward. 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.<sup>1</sup>

## 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

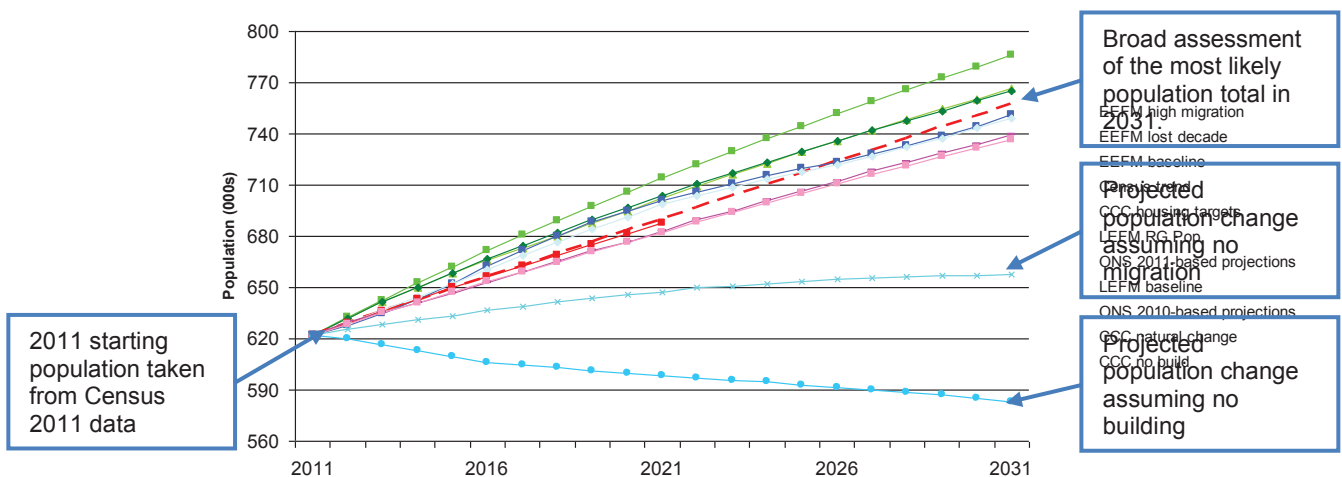


Table 1: Projected population change 2011-31			
Area	2011	2031	Increase
Cambridgeshire	623,000	767,000	144,000

<sup>1</sup> Visit [www.cambridgeshireinsight.org.uk/housing](http://www.cambridgeshireinsight.org.uk/housing) to view the Cambridge sub-region SHMA.

## How many jobs?

The two available economic models<sup>2</sup> 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

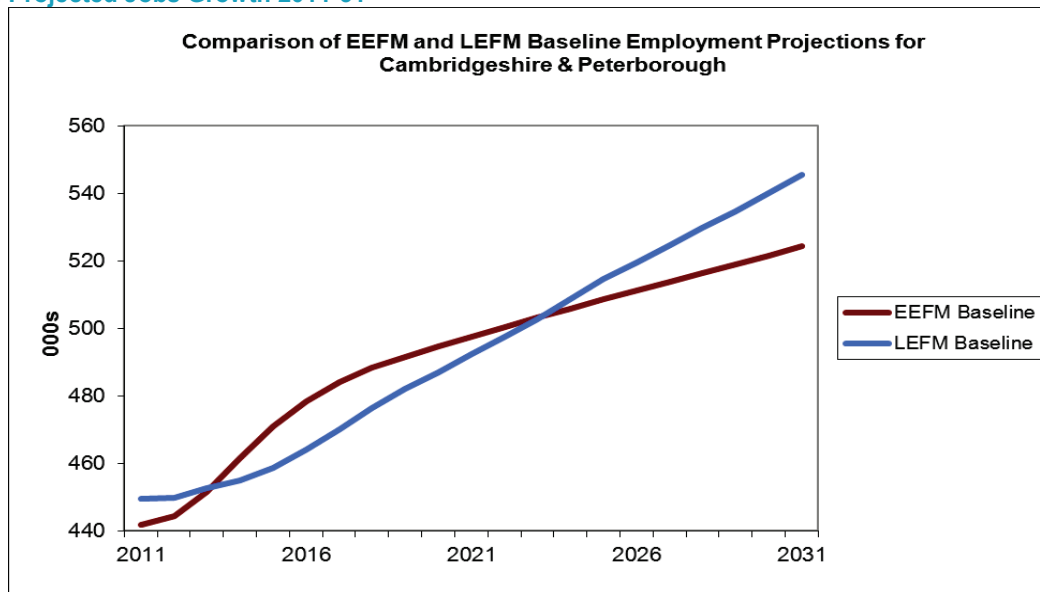


Table 2: Projected jobs growth 2011-31

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

## Peterborough

Peterborough's Local Development Framework, adopted in 2011, plans to provide 25,450 homes and 18,450 jobs between 2011 and 2026.

<sup>2</sup> 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).

# 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><b>Development and growth</b></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"> <li>a) Making best use of existing transport and other infrastructure (including ICT)</li> <li>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.</li> </ul> <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><b>Housing</b></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><b>Economic Development</b></p>	<p>Economic prosperity will be promoted throughout the area. New development will be encouraged that:</p> <ul style="list-style-type: none"> <li>• supports the growth of a sustainable low carbon economy in Cambridgeshire and Peterborough;</li> <li>• strengthens Peterborough and Cambridge’s environment clusters, and both areas’ high technology and knowledge-based clusters; and</li> <li>• is in locations that improve the alignment between homes and jobs.</li> </ul> <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><b>Transport</b></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>

<b>Other infrastructure</b>	<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>
<b>Water</b>	<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>
<b>Community and cultural infrastructure</b>	<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>
<b>Climate Change</b>	<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 CO<sub>2</sub> emissions in the built environment and transport choices.</p>
<b>The Natural Environment</b>	<p>To conserve and enhance the environment of Cambridgeshire and Peterborough in relation to:</p> <ul style="list-style-type: none"> <li>• landscape and water resources (including the Cam, the Great Ouse and Nene and associated Washes)</li> <li>• habitats and species (biodiversity)</li> <li>• public access to and enjoyment of the County's environmental assets in urban and rural areas (green infrastructure)</li> <li>• minimising waste and pollution.</li> </ul>

# 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.

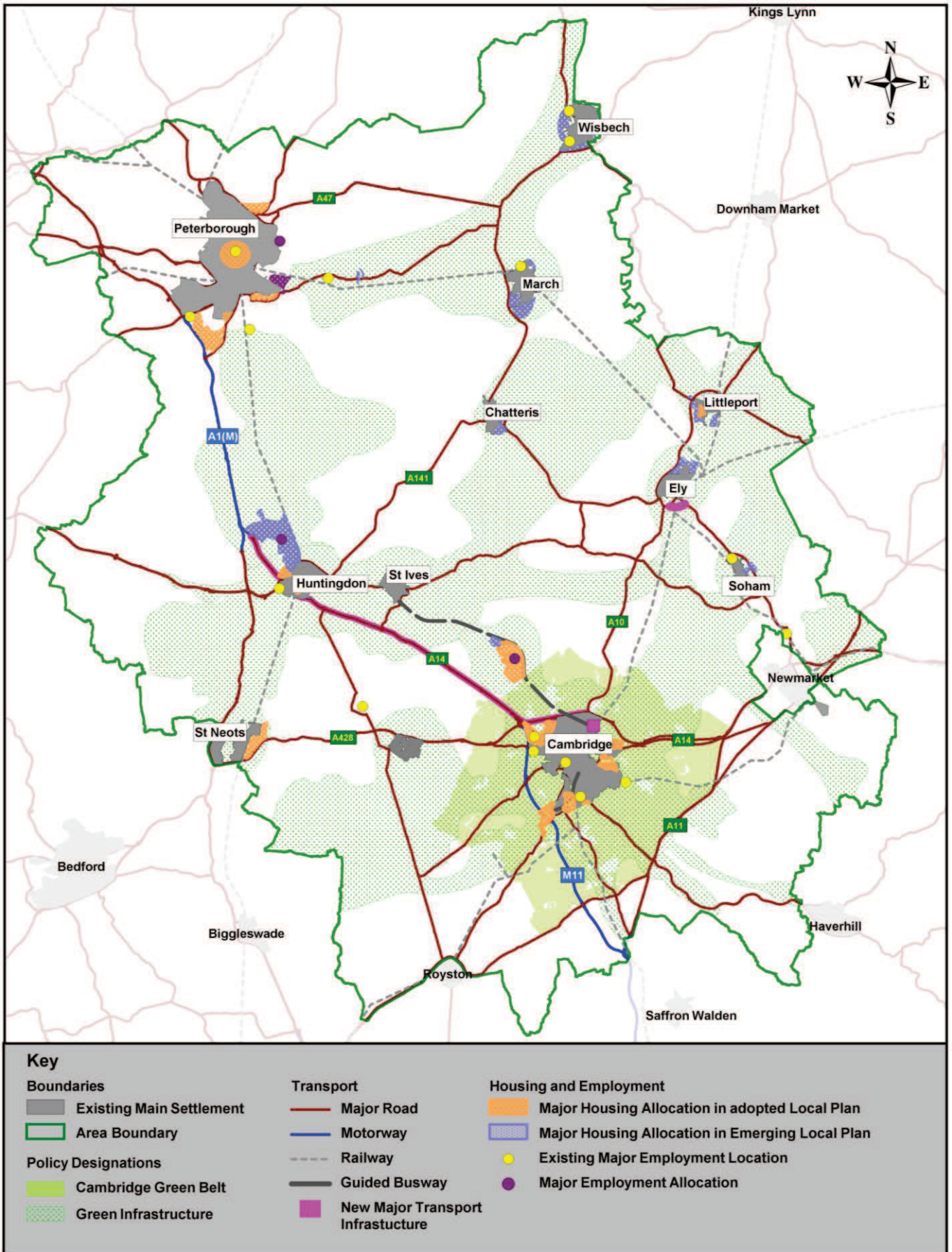
Further growth in Fenland will be directed towards the principal urban areas of March, Wisbech and Chatteris. A key objective is to ensure that growth complements and promotes sustainable economic regeneration. In East Cambridgeshire, a whole settlement masterplanning approach has been taken to planning 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



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 period<sup>1</sup>. 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<sup>2</sup>.
- 1.2 The Localism Act 2011 places a Duty to Co-operate on local planning authorities<sup>3</sup>. 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.

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<sup>1</sup> National Planning Policy Framework, paragraph 159.

<sup>2</sup> NPPF, paragraph 47.

<sup>3</sup> 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'<sup>4</sup>.
- 3.7 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.
- 3.8 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

<sup>4</sup> Joint Statement on the Development Strategy for Cambridgeshire and Peterborough by the local authorities, July 2012.

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
<b>Cambridgeshire</b>	<b>72,500</b>
Forest Heath	7,000
St Edmundsbury	11,000
<b>Total</b>	<b>90,500</b>

#### **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 authorities<sup>1</sup>

## 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 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

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<sup>1</sup> Cambridgeshire County Council, Cambridge City Council, East Cambridgeshire District Council, Fenland District Council, Huntingdonshire District Council, Peterborough City Council and South Cambridgeshire District Council.

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

## **Annex F: Joint Strategic Transport and Spatial Planning Group – Terms of Reference (March 2012)**

### **Outline**

The Group is a non decision making group that will offer steerage at a political level for the development of land use and transport strategy. It will meet in public. The group will facilitate cooperation between the authorities and better decision making through the relevant processes.

### **Purpose**

The group will provide efficient and effective coordination of spatial planning including land use and integrated transport strategy for the Cambridge City and South Cambridgeshire districts.

The group will provide opportunity for 3-way discussion on other strategic and cross-boundary issues, at the discretion of the Chair in discussion with Vice Chairs.

The group will provide high level oversight of current Cambridgeshire growth strategy.

### **Outcomes**

The outcomes from the group will be:

(a) to ensure policy alignment where necessary that will allow the timely development of the new Cambridge City and South Cambridgeshire Local Plans, coordinated with transport policy; and

(b) the development of a long term transport strategy, 2012 - 2050 for the Cambridge City and South Cambridgeshire Area that is consistent with the broader county wide transport strategy that is under development.

### **Membership**

The group will consist of three Members from each of Cambridge City Council, South Cambridgeshire District council and Cambridgeshire County Council. The membership of the group will be determined by each authority. Each authority should also nominate substitutes should the core participants not be able to attend particular meetings.

### **Winding Up of the Group**

The Group will be wound up:

- (a) (i) three years from today's date; or both
- (ii) achievement of long term transport strategy
- (iii) adoption of Plans by the authorities



- (b) on withdrawal of one of partner authorities
- (c) on voting or simple majority of Members.

### **Frequency of meetings**

Every two months, hosted on a rotating basis.

### **Secretariat**

The secretariat for the group will be provided on a twelve month rotating basis, commencing with the County Council. The Chairman should be chosen from the authority managing the meetings. At any one time, two vice chairs (one from each of the other authorities) should be nominated. Chairmanship and vice chairmanship will be determined each year on the anniversary of the first meeting.



## **Annex G: Greater Cambridgeshire Local Nature Partnership: A Statement of Cooperation between the Greater Cambridgeshire Local Nature Partnership and the applicable local planning authorities – April 2013**

### **Introduction**

The 2011 Natural Environment White Paper 'The Natural Choice' strongly supported the role of a healthy natural environment in delivering multiple benefits. There is good evidence that it is a cost-effective tool that can help local authorities to:

- support economic and social regeneration
- improve public health
- improve educational outcomes
- reduce crime and antisocial behaviour
- help communities adapt to climate change and
- improve the quality of life across a wide area.<sup>3</sup>

To help deliver this broad agenda, the White Paper recommended the establishment of Local Nature Partnerships (LNP). Over 50 have now been granted LNP status across England including the Greater Cambridgeshire LNP. This LNP embraces all of Cambridgeshire and Peterborough, and abuts similar partnerships in adjoining counties.

The main purposes of the LNPs are to:

- embed the value of the natural environment into local decision making
- promote sustainable land use and management
- promote the greening of economic growth
- advise on strategic planning matters
- enhance the quality of life, health and well-being of citizens.

### **The Greater Cambridgeshire LNP**

The Greater Cambridgeshire LNP was granted LNP status in Autumn 2012. Its emerging vision is:

*The Greater Cambridgeshire Local Nature Partnership will work to achieve a high quality natural environment in Cambridgeshire and Peterborough that will benefit business, communities and individuals.*

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<sup>3</sup> HM Government 'The Natural Choice. What the Natural Environment White paper means for local authorities.'

The first meeting of the board was in January 2013. Councillor Mike Rouse (East Cambs DC) was elected chair of the board, with the Wildlife Trust as vice chair. Other board members represent a cross section of interests including local authorities, environmental interests (Wildlife Trust and RSPB), Cambridgeshire ACRE, Cambridgeshire Local Access Forum, NFU, CLA, Public Health and the LEP. Defra is represented through Natural England/Environment Agency.

The work of the LNP is still in its infancy, though it will continue to embrace the long-standing and effective green infrastructure partnerships that have previously existed in Cambridgeshire and Peterborough. It is anticipated that the LNP will bring added value for the natural environment as a:

- Single strong voice championing the natural environment
- Mechanism for joined up working between sectors
- Way of achieving greater efficiencies through proactive partnership working and better use of resources
- Strategic leader of local delivery: agreed vision and action plan taken into account in local decision-making
- Channel for community engagement in nature, sharing best practice so adding value at a local level
- Co-ordinator of funding bids, including cross-sector

### **Strategic planning context**

All of Cambridgeshire's district councils are currently well progressed in preparing a refreshed Local Plan for their area. Peterborough City Council is likely to commence a refresh within the next few years, whilst Cambridgeshire County Council has recently adopted a suite of Minerals and Waste planning policy documents. When undertaking a refresh of their Local Plans, Local Planning Authorities (LPAs) have a 'Duty to Cooperate' with a number of bodies. This means LPAs must engage constructively, actively and on an ongoing basis in relation to planning of sustainable development with a number of prescribed bodies, with one such body being the LNP for its area.

### **Statement of Cooperation between the LNP and the LPAs**

The Greater Cambridgeshire LNP and the LPAs within its area recognise the long standing cooperation on green infrastructure issues which has taken place in the area (including the Green Infrastructure Strategy of 2011). Moving forward, the LNP and the LPAs look forward to continued cooperation for mutual benefit.

The LPAs support the emerging broader vision of the LNP and are committed to ensuring their Local Plans make appropriate policy support for the provision and protection of green infrastructure to achieve wider social and economic benefits, and the LPAs will work with the LNP to ensure the evidence base for green infrastructure is kept up to date. As and

when the priorities and action plans of the LNP are finalised or updated, the LPAs will, as part of preparing their next available Local Plan, work with the LNP and take account of such priorities.

The LNP acknowledges that LPAs are currently well progressed in the preparation of new Local Plans, and has welcomed the LPAs' support of the LNP. At this early stage in the preparation of LNP priorities and action planning, the LNP is satisfied that LPAs are, in principle and at a strategic level, appropriately addressing green infrastructure issues in their respective Local Plans. However, the LNP reserves the right to make individual representations to each Local Plan as and when such a plan is issued for consultation. The LNP acknowledges the careful judgements which LPAs have to take in balancing the various aspects which leads to sustainable development.

The LNP and the LPAs look forward to a future of continued cooperation and mutual support.



DC/CCC/DJP

21 November 2013

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Dear Patsy

### **Cambridge City Council Draft Local Plan 2014**

Thank you for inviting us to comment on the Cambridge City Local Plan 2014, and for approaching us in the pre consultation with respect to water resources policy. We are pleased to support the Council policies for reducing water consumption in new dwellings and in non-residential developments included in the Local Plan, and that for water re-use where practicable, with respect to supporting sustainable development and integrated water management. I have summarised our comments on these below.

#### **Policy 27**

The target for water consumption of 80 litres/head/day, equivalent to Code for sustainable Homes Level 6, aligns with Cambridge Waters' aspirations for new dwellings as stated in our Water Resources Management Plan. Whilst we cannot impose this for development, with the proposed development and growth in the Cambridge area, dwellings built to this standard will help protect water resource availability into the 2050's, and the planning process is an appropriate mechanism to encourage or enforce adoption of these standards.

#### **Policy 31**

Offsetting potable water demand by valuing water resources and re-using or recycling water where practicable and conserving water in the environment, is a key part of Cambridge Waters' long term vision for the most sustainable use of water resources, and we welcome preference to developments where this has been considered or included.



**CAMBRIDGE  
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The continued promotion of water efficiency is a key objective for Cambridge Water, this is our duty as stated in the Water Act, and is important in the management of demand for water. We have a programme of engagement for promoting and supporting customers water efficiency, and accordingly, set ourselves annual consumption targets. The policies set out in the Local Plan will ensure growth is delivered in the most sustainable manner.

Yours sincerely



Daniel Clark  
Environmental Manager

Copes; Simon Bunn, Emma Davies