

## **Appendix D: Summaries of Representations to the Consultation on Proposed Modifications - December 2015**

- Summaries of Representations on the Proposed Modifications Joint Consultation Report (pages numbered 'Page x of 294')
- Summaries of Representations on the Sustainability Appraisal Addendum (pages numbered 'Page x of 46')

CHAPTER: Appendix A: Proposed main PM/CC/2/A  
modifications to the Cambridge

**65410 Object**                      **Respondent: David Blake [25352]**                      **Agent: N/A**

Summary: Figure 2.1: Key Diagram (PM/CC/2/A) should be modified to remove GB1 and GB2, as their inclusion is against national policy, as exceptional circumstances on the basis of need can no longer be justified.

Change To Plan: For figure 2.1: Key Diagram (PM/CC/2/A) should be modified to remove GB1 and GB2.

Legally Compliant?: No

Full Reference: O - 65410 - 25352 - PM/CC/2/A - i, ii, iii, iv

**65689 Object**                      **Respondent: Mr Jeremy Jones [25348]**                      **Agent: N/A**

Summary: Figure 2.1: Key Diagram (PM/CC/2/A) should be modified to remove GB1 and GB2, as their inclusion is against national policy, as exceptional circumstances on the basis of need can no longer be justified.

Change To Plan: Figure 2.1: Key Diagram (PM/CC/2/A) should be modified to remove GB1 and GB2

Legally Compliant?: Not Specified

Full Reference: O - 65689 - 25348 - PM/CC/2/A - i, iv

**65756 Object**                      **Respondent: Mr Leonard Rix [25445]**                      **Agent: N/A**

Summary: Figure 2.1: Key Diagram (PM/CC/2/A) should be modified to remove GB1 and GB2. The basic need, even as modified to anticipate market indicators, is already overshoot without these two sites, both of which are acknowledged in the revised plan as being of real importance to the city setting. Their unexplained continuing inclusion is against national and local policy, as exceptional circumstances on the basis of need can no longer be justified.

Change To Plan: Amend Modification

Legally Compliant?: Not Specified

Full Reference: O - 65756 - 25445 - PM/CC/2/A - iv

**65992 Object**                      **Respondent: Commercial Estates Group [17653]**                      **Agent: Nathaniel Lichfield & Partners (Mr Matthew Spry) [20555]**

Summary: CEG has reviewed the updated evidence base and remains concerned that there is insufficient evidence to support the spatial distribution of housing growth around Cambridge and South Cambridgeshire.

CEG would support Plans which maximise development on the edge of Cambridge in principle, but the latest transport and infrastructure studies do not support the chosen locations for housing development, including the additional allocation on Land North of Cherry Hinton.

This representation is supported by a range of technical papers which form part of and support this representation, including a Technical Papers on Transport and Infrastructure (CEG Representation Appendices 4 and 5). These Papers provide a critique of the latest assessments and sets out the reasons why the proposed transport strategy and infrastructure will not adequately support growth or deliver sustainable development.

(Also applies to Mod PM/CC/Policies Map/A)

Relevant attachment  
Cambridge South East 1.4 Section 2 and  
Appendix 4(Transport) and 5 (Infrastructure)

Change To Plan: Amend modification

Legally Compliant?: Not Specified

Full Reference: O - 65992 - 17653 - PM/CC/2/A - i, ii, iii, iv

65187 Support

Respondent: Residents' Association of Old Newnham (Gillian Moore) [25297] Agent: N/A

Summary: The 94 RAON members were emailed on 18.12.15 with a summary of the proposed amendments to the Local Plan. The RAON committee proposed that the RAON support all the amendments. Members had until 15.1.16 to disagree with this proposal, but not one member disagreed.

Some members advocate the expansion of the market towns around Cambridge - Newmarket, Haverhill, etc. - to reduce the pressure on Cambridge to expand. This would require investment in public transport.

Change To Plan:

Legally Compliant?: Not Specified

Full Reference: S - 65187 - 25297 - PM/CC/2/A - None

65262 Support

Respondent: Rustat Road Neighbourhood Association (Mr Roger Crabtree) [16745] Agent: N/A

Summary: A logical change

Change To Plan:

Legally Compliant?: Not Specified

Full Reference: S - 65262 - 16745 - PM/CC/2/A - None

65918 Support

Respondent: Cambridge Past Present and Future (Ms Stacey Weiser) [20942] Agent: N/A

Summary: Support

Change To Plan:

Legally Compliant?: Not Specified

Full Reference: S - 65918 - 20942 - PM/CC/2/A - None

**65412 Object**                      **Respondent: David Blake [25352]**                      **Agent: N/A**

Summary: The housing numbers projected by Cambridge City Council are incorrect and do not conform with their commissioned report.

Change To Plan: The modification should be reworded to reflect the more reliable figure of 13,090 housing units.

Legally Compliant?: No

Full Reference: O - 65412 - 25352 - PM/CC/2/B - i, ii, iv

**65425 Object**                      **Respondent: Bidwells (Miss Marcia Whitehead) [17324]**                      **Agent: Bidwells LLP (Susan Chappell) [25316]**

Summary: Bidwells object to the Proposed Modification to Paragraph 2.17 re-confirming the OAN of 14,000. The Further Evidence in relation to the OAN to which the Proposed Modification refers is flawed and fails to fully consider economic trends.

Consequently, the Council's housing requirement is not founded on robust evidence prepared in a manner compliant with the NPPF and PPG. The Inspectors' concerns have not been fully addressed and the Council's Housing target still does not meet the OAN. The Proposed Modifications are therefore unsound as they are not:

- \* positively prepared;
- \* justified;
- \* consistent with National Policy.

Change To Plan: Bidwells therefore consider that the proposed housing requirement referred to in the Proposed Modifications to Paragraph 2.17 should be increased and that further amendments should be made to the proposed wording of the paragraph to reflect this.

Our previous Matter 3 Written Statement stated that the housing targets should be at least 17,950 dwellings for Cambridge City, which we maintain is still the case.

This revised approach would enable the Council to meet the objectively assessed housing needs for Cambridge in full and boost significantly the supply of housing in accordance with the requirements of the NPPF paragraphs 47 and 159 such that the Plan is Sound.

Summary of Changes

Bidwells therefore consider that the proposed housing requirement referred to in the Proposed Modifications to Paragraph 2.17 should be increased to 17,930 dwellings and that further amendments should be made to the proposed wording of the paragraph to reflect this.

This revised approach would enable the Council to meet the objectively assessed housing needs for Cambridge in full and boost significantly the supply of housing in accordance with the requirements of the NPPF paragraphs 47 and 159 such that the Plan is Sound.

Legally Compliant?: No

Full Reference: O - 65425 - 17324 - PM/CC/2/B - i, ii, iv

## 65434 Object

**Respondent: Pigeon Land & LIH [25320]**

**Agent: CODE Development Planners Ltd (Ms Karen Beech) [25295]**

Summary: The level of objectively assessed housing need has been under-estimated for:

1. The demographic projections have not been adjusted to take account of the assumption that household formation amongst younger households is suppressed.
2. Economic growth expectations have not been addressed so there is a misalignment between jobs and homes.
3. Significant key market signals; land values and past under delivery have not been considered.
4. No adjustment has been made to take account of the level of affordable housing need.
5. The full objectively assessed housing requirement for Cambridge is 15,200 dwellings and for South Cambridgeshire is 27,000 dwellings.

Relevant documents:

\*GLHearn Report - Whole Document

\*160125\_CSTpt.pdf - Executive summary; Section 1 - Introduction - para 1.1 to 1.6; Section 2 - OAHN & Housing Need - Section 2.1 (2.1.1 to 2.1.13); Section 7 - Conclusions - para 7.1 to 7.6

Change To Plan: In order to make the Local Plans sound in respect of objectively assessed housing needs, the housing requirement should be increased to reflect the full objectively assessed housing need resulting in a figure of 15,200 in Cambridge and 27,000 in South Cambridgeshire.

Legally Compliant?: Yes

Full Reference: O - 65434 - 25320 - PM/CC/2/B - i, ii, iii, iv

## 65491 Object

**Respondent: Pembroke College & the Balaam Family [21173]**

**Agent: Bidwells LLP (Susan Chappell) [25316]**

Summary: Pembroke College & the Balaam Family object to the Proposed Modification to Paragraph 2.17 re-confirming the OAN of 14,000. The Further Evidence in relation to the OAN to which the Proposed Modification refers is flawed and fails to fully consider economic trends.

Consequently, the Council's housing requirement is not founded on robust evidence prepared in a manner compliant with the NPPF and PPG. The Inspectors' concerns have not been fully addressed and the Council's Housing target still does not meet the OAN. The Proposed Modifications are therefore unsound as they are not:

\* positively prepared;

\* justified;

\* consistent with National Policy.

Change To Plan: Pembroke College & the Balaam Family therefore consider that the proposed housing requirement referred to in the Proposed Modifications to Paragraph 2.17 should be increased and that further amendments should be made to the proposed wording of the paragraph to reflect this.

Our previous Matter 3 Written Statement stated that the housing targets should be at least 17,950 dwellings for Cambridge City, which we maintain is still the case.

This revised approach would enable the Council to meet the objectively assessed housing needs for Cambridge in full and boost significantly the supply of housing in accordance with the requirements of the NPPF paragraphs 47 and 159 such that the Plan is Sound.

Pembroke College & the Balaam Family therefore consider that the proposed housing requirement referred to in the Proposed Modifications to Paragraph 2.17 should be increased to 17,930 dwellings and that further amendments should be made to the proposed wording of the paragraph to reflect this.

This revised approach would enable the Council to meet the objectively assessed housing needs for Cambridge in full and boost significantly the supply of housing in accordance with the requirements of the NPPF paragraphs 47 and 159 such that the Plan is Sound.

Legally Compliant?: No

Full Reference: O - 65491 - 21173 - PM/CC/2/B - i, ii, iv

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|---------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------|
| <b>65495 Object</b> | <b>Respondent: Endurance Estates Limited [19174]</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  | <b>Agent: Bidwells LLP (Susan Chappell) [25316]</b> |
|                     | <p>Summary: Endurance Estates object to the Proposed Modification to Paragraph 2.17 re-confirming the OAN of 14,000. The Further Evidence in relation to the OAN to which the Proposed Modification refers is flawed and fails to fully consider economic trends.</p> <p>Consequently, the Council's housing requirement is not founded on robust evidence prepared in a manner compliant with the NPPF and PPG. The Inspectors' concerns have not been fully addressed and the Council's Housing target still does not meet the OAN. The Proposed Modifications are therefore unsound as they are not:</p> <ul style="list-style-type: none"> <li>* positively prepared;</li> <li>* justified;</li> <li>* consistent with National Policy.</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |                                                     |
|                     | <p>Change To Plan: Endurance Estates therefore consider that the proposed housing requirement referred to in the Proposed Modifications to Paragraph 2.17 should be increased and that further amendments should be made to the proposed wording of the paragraph to reflect this.</p> <p>Our previous Matter 3 Written Statement stated that the housing targets should be at least 17,950 dwellings for Cambridge City, which we maintain is still the case.</p> <p>This revised approach would enable the Council to meet the objectively assessed housing needs for Cambridge in full and boost significantly the supply of housing in accordance with the requirements of the NPPF paragraphs 47 and 159 such that the Plan is Sound.</p> <p>Endurance Estates therefore consider that the proposed housing requirement referred to in the Proposed Modifications to Paragraph 2.17 should be increased to 17,930 dwellings and that further amendments should be made to the proposed wording of the paragraph to reflect this.</p> <p>This revised approach would enable the Council to meet the objectively assessed housing needs for Cambridge in full and boost significantly the supply of housing in accordance with the requirements of the NPPF paragraphs 47 and 159 such that the Plan is Sound.</p> |                                                     |
|                     | <p>Legally Compliant?: No</p> <p>Full Reference: O - 65495 - 19174 - PM/CC/2/B - i, ii, iv</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |                                                     |

## 65499 Object

**Respondent: Unwins and Biggs [25382]**

**Agent: Bidwells LLP (Susan Chappell) [25316]**

Summary: Unwins & Biggs object to the Proposed Modification to Paragraph 2.17 re-confirming the OAN of 14,000. The Further Evidence in relation to the OAN to which the Proposed Modification refers is flawed and fails to fully consider economic trends.

Consequently, the Council's housing requirement is not founded on robust evidence prepared in a manner compliant with the NPPF and PPG. The Inspectors' concerns have not been fully addressed and the Council's Housing target still does not meet the OAN. The Proposed Modifications are therefore unsound as they are not:

- \* positively prepared;
- \* justified;
- \* consistent with National Policy.

Change To Plan: Unwins & Biggs therefore consider that the proposed housing requirement referred to in the Proposed Modifications to Paragraph 2.17 should be increased and that further amendments should be made to the proposed wording of the paragraph to reflect this.

Our previous Matter 3 Written Statement stated that the housing targets should be at least 17,950 dwellings for Cambridge City, which we maintain is still the case.

This revised approach would enable the Council to meet the objectively assessed housing needs for Cambridge in full and boost significantly the supply of housing in accordance with the requirements of the NPPF paragraphs 47 and 159 such that the Plan is Sound.

Unwins & Biggs therefore consider that the proposed housing requirement referred to in the Proposed Modifications to Paragraph 2.17 should be increased to 17,930 dwellings and that further amendments should be made to the proposed wording of the paragraph to reflect this.

This revised approach would enable the Council to meet the objectively assessed housing needs for Cambridge in full and boost significantly the supply of housing in accordance with the requirements of the NPPF paragraphs 47 and 159 such that the Plan is Sound.

Legally Compliant?: No

Full Reference: O - 65499 - 25382 - PM/CC/2/B - i, ii, iv

## 65502 Object

**Respondent: Emmanuel & Gonville & Caius [25384]**

**Agent: Bidwells LLP (Susan Chappell) [25316]**

Summary: Emmanuel & Gonville & Caius object to the Proposed Modification to Paragraph 2.17 re-confirming the OAN of 14,000. The Further Evidence in relation to the OAN to which the Proposed Modification refers is flawed and fails to fully consider economic trends.

Consequently, the Council's housing requirement is not founded on robust evidence prepared in a manner compliant with the NPPF and PPG. The Inspectors' concerns have not been fully addressed and the Council's Housing target still does not meet the OAN. The Proposed Modifications are therefore unsound as they are not:

- \* positively prepared;
- \* justified;
- \* consistent with National Policy.

Change To Plan: Emmanuel & Gonville & Caius therefore consider that the proposed housing requirement referred to in the Proposed Modifications to Paragraph 2.17 should be increased and that further amendments should be made to the proposed wording of the paragraph to reflect this.

Our previous Matter 3 Written Statement stated that the housing targets should be at least 17,950 dwellings for Cambridge City, which we maintain is still the case.

This revised approach would enable the Council to meet the objectively assessed housing needs for Cambridge in full and boost significantly the supply of housing in accordance with the requirements of the NPPF paragraphs 47 and 159 such that the Plan is Sound.

Emmanuel & Gonville & Caius therefore consider that the proposed housing requirement referred to in the Proposed Modifications to Paragraph 2.17 should be increased to 17,930 dwellings and that further amendments should be made to the proposed wording of the paragraph to reflect this.

This revised approach would enable the Council to meet the objectively assessed housing needs for Cambridge in full and boost significantly the supply of housing in accordance with the requirements of the NPPF paragraphs 47 and 159 such that the Plan is Sound.

Legally Compliant?: No

Full Reference: O - 65502 - 25384 - PM/CC/2/B - i, ii, iv

## 65608 Object

**Respondent: Dr Barry Rosen [25299]**

**Agent: N/A**

Summary: Figure 2.1: Key Diagram (PM/CC/2/A) should be modified to remove GB1 and GB2, as their inclusion is against national policy, as exceptional circumstances on the basis of need no longer exist

Change To Plan: Removal of GB1 and GB2 as there is no longer demonstrated need for their release from Green Belt

Legally Compliant?: Yes

Full Reference: O - 65608 - 25299 - PM/CC/2/B - i, iv

## 65617 Object

**Respondent: Dr Barry Rosen [25299]**

**Agent: N/A**

Summary: Numbers for Objectively Assessed Need(AON) are wrong and overestimated (support of Jeremy Jones' evidence)

Change To Plan: OAN should be the more accurate number of 13,090 (see evidence from Jeremy Jones' representation)

Legally Compliant?: Yes

Full Reference: O - 65617 - 25299 - PM/CC/2/B - i, ii

## 65757 Object

**Respondent: Mr Leonard Rix [25445]**

**Agent: N/A**

Summary: The revised projected need for houses in Cambridge is 10,069 (Edge Analytics)

Raised by 'rule of thumb' (to meet market signals) by 30% comes to 13,209.

Somehow this figure has been further inflated to 14,000. But the revised Plan has already provided for well over 14,000 houses elsewhere.

There is no longer any need to attack the Green Belt, which is now acknowledged to be of importance to the setting of the city.

Change To Plan: Amend Modification

Legally Compliant?: Not Specified

Full Reference: O - 65757 - 25445 - PM/CC/2/B - i, ii

## 65758 Object

**Respondent: Mr Leonard Rix [25445]**

**Agent: N/A**

Summary: The revised projected need for houses in Cambridge is 10,069 (Edge Analytics)

Raised by 'rule of thumb' (to meet market signals) by 30% comes to 13,209.

Somehow this figure has been further inflated to 14,000. But the revised Plan has already provided for well over 14,000 houses elsewhere.

There is no longer any need to attack the Green Belt, which is now acknowledged to be of importance to the setting of the city.

Change To Plan: Amend modification

Legally Compliant?: Not Specified

Full Reference: O - 65758 - 25445 - PM/CC/2/B - i, ii

## 65890 Object

**Respondent: Home Builders Federation (Mr James Stevens) [15801]**

**Agent: N/A**

Summary: We agree that a 30% uplift ought to be added to this base-line figure to help alleviate issues of affordability. This would result in a figure of 16,942 dwellings for the planning period 2011-2031. This should be rounded up to 17,000, which gives an average of 850 dpa.

Change To Plan:

Legally Compliant?: Not Specified

Full Reference: O - 65890 - 15801 - PM/CC/2/B - ii



## 65994 Object

**Respondent: Commercial Estates Group [17653]**

**Agent: Nathaniel Lichfield & Partners (Mr Matthew Spry) [20555]**

Summary: CEG maintains that the Objectively Assessed Housing Need (OAHN) for the HMA is greater than the Councils propose, and in particular the need in Cambridge City is greater than the 14,000 homes provided by the draft Cambridge Local Plan.

This representation is supported by a range of technical papers which form part of and support this representation, including a Technical Paper on OAHN (CEG Representation Appendix 2). This Paper provides a critique of the latest PBA assessment and sets out the reasons why the OAHN must be increased to 41,000 new homes if the jobs target of 44,000 is to be met.

Relevant Attachment  
Cambridge South East 1.4 Section 2(a) - OAHN (2.2-2.13)  
and Appendix 2 (OAHN)

Change To Plan: Amend modification

Legally Compliant?: Not Specified

Full Reference: O - 65994 - 17653 - PM/CC/2/B - i, ii, iii, iv

## 66029 Object

**Respondent: St Johns College [3084]**

**Agent: Savills (Mr Garth Hanlon) [963]**

Summary: Strongly disagree with Councils assessment of housing need. PBA report commissioned by Councils does not address concerns raised by Inspectors. Report underestimates strength of market in Cambridge and S Cambs. Commissioned report by GL Hearn to response to PBA and reviewed Councils' OAN. Findings of this report - 42,226 homes required across both authorities (15,230 in Cambridge and 27,230 in S Cambs). Imbalance between houses and jobs resulting in in-commuting - unsustainable plan. Current housing growth will not support growth in jobs. Lower rate of growth than previously planned for - not consistent with NPPF. Will result in deterioration in housing affordability; constraint on economic growth; inadequate supply of affordable housing. Also commissioned Report on Market Signals - Results show housing prices in Cambridge and S Cambs very high and it is one of the least affordable areas to live in the region. PBA underestimates strength of market - evidence up to 2014 - out of date.

Change To Plan:

Legally Compliant?: Not Specified

Full Reference: O - 66029 - 3084 - PM/CC/2/B - i, iii, iv

## 66101 Object

**Respondent: Grosvenor Developments Ltd and USS [25482]**

**Agent: Savills (Mr Colin Campbell) [15804]**

Summary: Updated assessment of housing need is not considered to be appropriate evidence to justify the plan.

Cambridge prices stand 45% above the 2007/08, South Cambridgeshire are at +25%. In E&W prices are c2.5% above 2007/08 peak.

Canterbury and Uttlesford currently c20% above 2007 peak, and Eastleigh is c10% above. Eastleigh is not comparable to South Cambridgeshire. Canterbury is more appropriate for comparison with South Cambridgeshire.

South Cambridgeshire uplift should be significantly higher than 20% and a strong case that it should be higher than Canterbury.

Cambridge City significantly outstrips Canterbury. Uplift for market signals should be significantly higher than 30%.

Change To Plan: Amend modification

Legally Compliant?: Not Specified

Full Reference: O - 66101 - 25482 - PM/CC/2/B - i, ii, iii, iv

## 66113 Object

**Respondent: Grosvenor Developments Ltd and USS [25482]**

**Agent: Savills (Mr Colin Campbell) [15804]**

Summary: SA scores the plans as positive for housing, including affordable housing. Table 10 of the Councils' Matter 3 statements identify that every year in Cambridge there is newly arising affordable need of 404 homes. The plans therefore cannot meet needs in and on the edge of Cambridge at the end of the plan period when only c350 homes are delivered each year.

The housing figures will not deliver sufficient new homes to tackle the need for affordable housing. At the end of the plan period the back log will be greater than at the start of the plan period.

Change To Plan: Delete modification

Legally Compliant?: Not Specified

Full Reference: O - 66113 - 25482 - PM/CC/2/B - i, ii, iii, iv

## 66122 Object

**Respondent: North Barton Road Land Owners Group [21302]**

**Agent: Carter Jonas LLP (Brian Flynn) [17331]**

Summary: The PBA Report does not provide a guidance-compliant assessment of Objectively-Assessed Housing Need. It is flawed because it fails to consider:  
-The plans' economic aspirations and the level of housing provision necessary to support this;  
-Assumptions inherent in demographic modelling; and  
-land values as a market signal, which point to constrained residential land supply in Cambridge. This is in conflict with the PPG.

Relevant attachments:

-Jan Representations OAN (25.01.16).pdf

-North BRLOG LP Mods Jan 2016.pdf : Paragraphs 14 to 17.pdf

Change To Plan: the housing target for Cambridge should be increased to 15,200 dwellings between 2011 and 2031. If those needs cannot be met within Cambridge then they should be met within South Cambridgeshire with associated increases to the housing requirement in Draft SCLP.

Legally Compliant?: Not Specified

Full Reference: O - 66122 - 21302 - PM/CC/2/B - i, ii, iv

## 66123 Object

**Respondent: Cambridgeshire County Council - Strategic Assets Team [25478]**

**Agent: Carter Jonas LLP (Brian Flynn) [17331]**

Summary: The PBA Report on Objectively Assessed Housing Need is inadequate. No increase for Cambridge and an increase of only 500 dwellings for South Cambridgeshire would still be at the lower end of possible options, and as such would not be a positive outcome and would not boost significantly the supply of housing.

The housing target for Cambridge and South Cambridgeshire should be 42,780 dwellings over the period 2011-2031, with wappropriate adjustments made to comply with the requirements of Paragraphs 014 to 029 of the NPPG.

The housing target needs to be increased to address the housing crisis and chronic shortage of affordable housing in Cambridge and South Cambridgeshire.

Relevant paragraphs of supporting document: 10 to 14

Change To Plan: We request that the housing target for Cambridge and South Cambridgeshire should be increased.

Legally Compliant?: Not Specified

Full Reference: O - 66123 - 25478 - PM/CC/2/B - i, ii, iii, iv

## 65117 Support

**Respondent: Dr Roger Sewell [25099]**

**Agent: N/A**

Summary: I am glad that no significant increase in housing provision is being proposed.

Change To Plan:

Legally Compliant?: Not Specified

Full Reference: S - 65117 - 25099 - PM/CC/2/B - None

## 65142 Support

**Respondent: Historic England (Mr David Grech) [23622]**

**Agent: N/A**

Summary: Historic England does not wish to comment on the further independent work commissioned by the two authorities, but we note the conclusion that the current requirement of 14,000 homes for Cambridge is endorsed, and the figure for South Cambridgeshire is to be raised from 19,000 to 19,500 homes.

Historic England does not object to the main modification to the Cambridge Local Plan in respect of Objectively Assessed Need as set out in paragraph 2.13 of the Proposed Modifications Joint Consultation Report.

Change To Plan:

Legally Compliant?: Not Specified

Full Reference: S - 65142 - 23622 - PM/CC/2/B - None

## 65188 Support

**Respondent: Residents' Association of Old Newnham (Gillian Moore) [25297]**

**Agent: N/A**

Summary: The 94 RAON members were emailed on 18.12.15 with a summary of the proposed amendments to the Local Plan. The RAON committee proposed that the RAON support all the amendments. Members had until 15.1.16 to disagree with this proposal, but not one member disagreed.

Some members advocate the expansion of the market towns around Cambridge - Newmarket, Haverhill, etc. - to reduce the pressure on Cambridge to expand. This would require investment in public transport.

Change To Plan:

Legally Compliant?: Not Specified

Full Reference: S - 65188 - 25297 - PM/CC/2/B - None

## 65244 Support

**Respondent: Ms Elaine Culshaw [25319]**

**Agent: N/A**

Summary: The modified plan meets th housing need and should be adopted as soon as possible.

Change To Plan:

Legally Compliant?: Not Specified

Full Reference: S - 65244 - 25319 - PM/CC/2/B - None

## 65263 Support

**Respondent: Rustat Road Neighbourhood Association (Mr Roger Crabtree) [16745]**

**Agent: N/A**

Summary: We are very pleased that the additional work confirms and supports the previous housing need assessment. We continue to support the 14,000 figure and urge the Council to strongly defend this figure against any attempts to increase it

Change To Plan:

Legally Compliant?: Not Specified

Full Reference: S - 65263 - 16745 - PM/CC/2/B - None

## 65676 Support

**Respondent: Windsor Road Residents (Dr Ann Mullinger) [2490]**

**Agent: N/A**

Summary: We strongly support the Councils' objectively assessed need for 14,000 new dwellings for Cambridge City.

We support the Councils' claim that their Proposed Modifications are consistent with the revisions to National Planning Policy, produced after the Local Plans were first submitted for examination.

Change To Plan:

Legally Compliant?: Yes

Full Reference: S - 65676 - 2490 - PM/CC/2/B - None

65776 Support

Respondent: North Hertfordshire District Council (Mr David Hill) [12057]

Agent: N/A

Summary: As with our previous responses to your plan we are of the view that from a neighbouring authority perspective and with the Duty to Cooperate in mind, there would not appear to be too much that would require detailed discussions.

The Proposed Modifications document is not changing the Local Plan and the associated growth strategy, rather clarifying a number of points and providing more detail where the inspector has identified specific issues, therefore, at this time North Hertfordshire District Council has nothing substantial to add to previous comments.

Change To Plan:

Legally Compliant?: Not Specified

Full Reference: S - 65776 - 12057 - PM/CC/2/B - None

65919 Support

Respondent: Cambridge Past Present and Future (Ms Stacey Weiser) [20942]

Agent: N/A

Summary: CambridgePPF believes that the additional independent technical evidence takes adequate account of both recent national guidance and market forces, and therefore provides a realistic basis for the planning of residential provision. We support the Council's projection of 14,000 dwellings.

Change To Plan:

Legally Compliant?: Not Specified

Full Reference: S - 65919 - 20942 - PM/CC/2/B - None

66223 Support

Respondent: Federation of Cambridge Residents' Associations (Ms Tania Elliot) [25488]

Agent: N/A

Summary: I support the endorsement of the original estimate for 14,000 homes in Cambridge and slight upward revision for South Cambs

Change To Plan:

Legally Compliant?: Not Specified

Full Reference: S - 66223 - 25488 - PM/CC/2/B - None

**65128 Object**                      **Respondent: Mr J Hilbery [3767]**                      **Agent: N/A**

Summary: This was not the basis of how the original plans under review were compiled. This is a ruse to fudge figures

Change To Plan: Revert back to original basis

Legally Compliant?: No

Full Reference: O - 65128 - 3767 - PM/CC/2/C - None

**65455 Object**                      **Respondent: Bidwells (Miss Marcia Whitehead) [17324]**                      **Agent: Bidwells LLP (Susan Chappell) [25316]**

Summary: Bidwells object to the Proposed Modification to Paragraph 2.17a proposing a joint housing trajectory for Cambridge and South Cambridgeshire for the purposes of phasing of housing delivery including for calculating the 5-year housing land supply.

However, this approach does not comply with the NPPF which requires that, to boost significantly the supply of housing, local planning authorities should identify and update annually a supply of specific deliverable sites sufficient to provide five years' worth of housing against their housing requirements.

Consequently, the Proposed Modification is unsound in that it is not:

- \* positively prepared;
- \* consistent with National Policy.

Change To Plan: Paragraph 2.17a should be deleted and any shortfalls in the Council's housing land supply should be addressed through further allocations within the Plan.

It is considered that this revised approach would enable the Council to meet the objectively assessed housing needs for Cambridge in full and boost significantly the supply of housing in accordance with the requirements of Government guidance in the NPPF paragraphs 47 and 159. As such, this will ensure that the Plan is Sound.

Legally Compliant?: No

Full Reference: O - 65455 - 17324 - PM/CC/2/C - i, iv

**65492 Object**                      **Respondent: Pembroke College & the Balaam Family [21173]**                      **Agent: Bidwells LLP (Susan Chappell) [25316]**

Summary: Pembroke College & the Balaam Family object to the Proposed Modification to Paragraph 2.17a proposing a joint housing trajectory for Cambridge and South Cambridgeshire for the purposes of phasing of housing delivery including for calculating the 5-year housing land supply. This approach does not comply with the NPPF which requires that, to boost significantly the supply of housing, local planning authorities should identify and update annually a supply of specific deliverable sites sufficient to provide five years' worth of housing against their housing requirements. The Proposed Modification is unsound in that it is not:

- \* positively prepared;
- \* consistent with National Policy.

Change To Plan: Paragraph 2.17a should be deleted and any shortfalls in the Council's housing land supply should be addressed through further allocations within the Plan.

It is considered that this revised approach would enable the Council to meet the objectively assessed housing needs for Cambridge in full and boost significantly the supply of housing in accordance with the requirements of Government guidance in the NPPF paragraphs 47 and 159. As such, this will ensure that the Plan is Sound.

Legally Compliant?: No

Full Reference: O - 65492 - 21173 - PM/CC/2/C - i, iv

## 65496 Object

**Respondent: Endurance Estates Limited [19174]**

**Agent: Bidwells LLP (Susan Chappell) [25316]**

Summary: Endurance Estates object to the Proposed Modification to Paragraph 2.17a proposing a joint housing trajectory for Cambridge and South Cambridgeshire for the purposes of phasing of housing delivery including for calculating the 5-year housing land supply.

However, this approach does not comply with the NPPF which requires that, to boost significantly the supply of housing, local planning authorities should identify and update annually a supply of specific deliverable sites sufficient to provide five years' worth of housing against their housing requirements.

Consequently, the Proposed Modification is unsound in that it is not:

\* positively prepared;

\* consistent with National Policy.

Change To Plan: Paragraph 2.17a should be deleted and any shortfalls in the Council's housing land supply should be addressed through further allocations within the Plan.

It is considered that this revised approach would enable the Council to meet the objectively assessed housing needs for Cambridge in full and boost significantly the supply of housing in accordance with the requirements of Government guidance in the NPPF paragraphs 47 and 159. As such, this will ensure that the Plan is Sound.

Legally Compliant?: No

Full Reference: O - 65496 - 19174 - PM/CC/2/C - i, iv

## 65501 Object

**Respondent: Unwins and Biggs [25382]**

**Agent: Bidwells LLP (Susan Chappell) [25316]**

Summary: Unwins & Biggs object to the Proposed Modification to Paragraph 2.17a proposing a joint housing trajectory for Cambridge and South Cambridgeshire for the purposes of phasing of housing delivery including for calculating the 5-year housing land supply.

However, this approach does not comply with the NPPF which requires that, to boost significantly the supply of housing, local planning authorities should identify and update annually a supply of specific deliverable sites sufficient to provide five years' worth of housing against their housing requirements.

Consequently, the Proposed Modification is unsound in that it is not:

\* positively prepared;

\* consistent with National Policy.

Change To Plan: Paragraph 2.17a should be deleted and any shortfalls in the Council's housing land supply should be addressed through further allocations within the Plan.

It is considered that this revised approach would enable the Council to meet the objectively assessed housing needs for Cambridge in full and boost significantly the supply of housing in accordance with the requirements of Government guidance in the NPPF paragraphs 47 and 159. As such, this will ensure that the Plan is Sound.

Legally Compliant?: No

Full Reference: O - 65501 - 25382 - PM/CC/2/C - i, iv

65503 Object

Respondent: Emmanuel & Gonville & Caius [25384]

Agent: Bidwells LLP (Susan Chappell) [25316]

Summary: Emmanuel & Gonville & Caius object to the Proposed Modification to Paragraph 2.17a proposing a joint housing trajectory for Cambridge and South Cambridgeshire for the purposes of phasing of housing delivery including for calculating the 5-year housing land supply.

This approach does not comply with the NPPF which requires that, to boost significantly the supply of housing, local planning authorities should identify and update annually a supply of specific deliverable sites sufficient to provide five years' worth of housing against their housing requirements.

Consequently, the Proposed Modification is unsound in that it is not:

- \* positively prepared;
- \* consistent with National Policy.

Change To Plan: Paragraph 2.17a should be deleted and any shortfalls in the Council's housing land supply should be addressed through further allocations within the Plan.

It is considered that this revised approach would enable the Council to meet the objectively assessed housing needs for Cambridge in full and boost significantly the supply of housing in accordance with the requirements of Government guidance in the NPPF paragraphs 47 and 159. As such, this will ensure that the Plan is Sound.

Legally Compliant?: No

Full Reference: O - 65503 - 25384 - PM/CC/2/C - i, iv

65546 Object

Respondent: Pigeon Land & LIH [25320]

Agent: CODE Development Planners Ltd (Ms Karen Beech) [25295]

Summary: We do not consider that Cambridge City and South Cambridgeshire should have a joint housing trajectory.

South Cambridgeshire and Cambridge City have separate local plans and should therefore in our view have separate housing trajectories.

This was confirmed by the inspector who considered two planning appeals at Waterbeach and said in the decision letter, dated 25 June 2014, that a joint housing trajectory would not be the correct approach.

Relevant documents:160125\_CSTpt.pdf

- Executive summary
- Section 1 - Introduction - para 1.1 to 1.6
- Section 2 - OAHN & Housing Delivery - section 2.2 - para 2.2.1 to 2.2.5
- Section 4 - Overall Development Strategy - para 4.1 to 4.5
- Section 7 - Conclusions - para 7.1 to 7.6

Change To Plan: Given that Cambridge City and South Cambridgeshire are preparing separate Local Plans, each should have their own housing trajectory.

Legally Compliant?: Yes

Full Reference: O - 65546 - 25320 - PM/CC/2/C - i, ii, iii

## 65891 Object

**Respondent: Home Builders Federation (Mr James Stevens) [15801]**

**Agent: N/A**

Summary: Not clear what Council is proposing in paragraph 2.17a. Councils not prepared a joint plan. Each will need to produce own housing trajectory supported by five year housing land supply in accordance with paragraph 47 NPPF.

Concerned there could be confusion over five year land supply situation in each authority.

South Cambridgeshire needs to ensure delivering homes during early part of plan, as much as in later part. Cannot be delayed until latter years. If unable to demonstrate a five year supply based on annual average 967 dpa plan is unsound. Cambridge should prepare a five year housing land supply based on annual average 700 dpa and bring forward sites to ensure it achieves overall requirement of 14,000 dwellings.

Two Councils want benefit of joint plan but without surrendering political control.

Change To Plan:

Legally Compliant?: Not Specified

Full Reference: O - 65891 - 15801 - PM/CC/2/C - ii, iv

## 65995 Object

**Respondent: Commercial Estates Group [17653]**

**Agent: Nathaniel Lichfield & Partners (Mr Matthew Spry) [20555]**

Summary: Notwithstanding discussions in the Examination sessions to date, the modifications do not include a clear commitment to an early review of the Plans in 2019.

If the Plans are to progress based on a joint housing trajectory, this must only be on the basis of a clear commitment to an early review, which will include a further review of the Cambridge Green Belt given the concerns regarding the methodology and outcome of Green Belt reviews undertaken to date (see accompanying technical paper and earlier representations).

This representation is supported by a summary document and range of technical papers prepared by CEG which form part of and support this representation.

Relevant Attachment  
Cambridge South East 1.4 3.19-3.23  
All Appendix, and 2 (OAHN) and 3(Green Belt)in particular.

Change To Plan: Amend modification

Legally Compliant?: Not Specified

Full Reference: O - 65995 - 17653 - PM/CC/2/C - i, ii, iii, iv

## 66099 Object

**Respondent: Grosvenor Developments Ltd and USS [25482]**

**Agent: Savills (Mr Colin Campbell) [15804]**

Summary: Both plans identify that they are meeting that Districts own needs - no need for a joint five year housing trajectory. Significant concerns as to how the approach will work in practice and how any shortfall in the five year supply would be rectified.

NPPF para. 47 states that local planning authorities should "identify and update annually a supply of specific deliverable sites sufficient to provide five years worth of housing against their housing requirements"

Change To Plan: Delete modification

Legally Compliant?: Not Specified

Full Reference: O - 66099 - 25482 - PM/CC/2/C - None



## 66129 Object

**Respondent: North Barton Road Land Owners Group [21302]**

**Agent: Carter Jonas LLP (Brian Flynn) [17331]**

Summary: The joint housing trajectory:

-Is a negative response to the housing land supply shortfall in South Cambridgeshire. It is not clear, for example, what action Cambridgeshire City Council could take if there is a housing shortfall against the joint housing trajectory caused by the failure to deliver development at the proposed new settlements in South Cambridgeshire;  
-Has not been assessed against sustainability objectives, particularly in terms of the potential negative impacts on affordable housing if there are delays to delivery at the new settlements. No alternatives to a joint housing trajectory have been considered or consulted on by the Councils.

Relevant attachments:

-Jan Representations OAN (25.01.16).pdf

-North BRLOG LP Mods Jan 2016.pdf : Paragraphs 18 to 19.pdf

Change To Plan: We request that all references to a joint housing trajectory are deleted from Draft CLP2014.

Legally Compliant?: Not Specified

Full Reference: O - 66129 - 21302 - PM/CC/2/C - i, ii, iv

## 65189 Support

**Respondent: Residents' Association of Old Newnham (Gillian Moore) [25297]**

**Agent: N/A**

Summary: The 94 RAON members were emailed on 18.12.15 with a summary of the proposed amendments to the Local Plan. The RAON committee proposed that the RAON support all the amendments. Members had until 15.1.16 to disagree with this proposal, but not one member disagreed.

Some members advocate the expansion of the market towns around Cambridge - Newmarket, Haverhill, etc. - to reduce the pressure on Cambridge to expand. This would require investment in public transport.

Change To Plan:

Legally Compliant?: Not Specified

Full Reference: S - 65189 - 25297 - PM/CC/2/C - None

## 65264 Support

**Respondent: Rustat Road Neighbourhood Association (Mr Roger Crabtree) [16745]**

**Agent: N/A**

Summary: Pleased to see a further example of joint working

Change To Plan:

Legally Compliant?: Not Specified

Full Reference: S - 65264 - 16745 - PM/CC/2/C - None

## 65920 Support

**Respondent: Cambridge Past Present and Future (Ms Stacey Weiser) [20942]**

**Agent: N/A**

Summary: Cambridge City has restricted supply of land available for development, including brownfield sites. Entirely surrounded by SCDC. Recent Access Audit commissioned by City Council shows huge scale of daily movement of people into and out of city - 200,000 daily movements, mainly commuting journeys between home and work. If, as both Councils propose, Green Belt is to be retained with its inner boundary tightly drawn, common sense should dictate the housing trajectories of two Councils should be considered jointly as their spatial planning is so inter-twined. Councils are properly discharging their statutory duty to cooperate, including need for neighbouring authorities to plan together. 2014 Memorandum of Understanding should be as a material consideration.

Change To Plan:

Legally Compliant?: Not Specified

Full Reference: S - 65920 - 20942 - PM/CC/2/C - None

**65514 Object**

**Respondent: Pigeon Land & LIH [25320]**

**Agent: CODE Development Planners Ltd (Ms Karen Beech) [25295]**

Summary: The development strategy and the percentage of development proposed in the second tier of sites in the settlement hierarchy (the edge of Cambridge) continues to be reliant on commitments carried forward from previous local plans.  
There are inconsistencies and inaccuracies in the assessment of the reasonable alternatives; the urban fringe sites, in both the Green Belt Assessment and the SA Addendum Report which has resulted in a skew towards the allocation of new settlements.  
The sustainability balance proposed in seeking to justify the dispersal of development into new settlements in South Cambridgeshire away from the centre of Cambridge is flawed

Relevant documents:160125\_CSTpt.pdf

Executive summary  
Section 1 - Introduction - para 1.1 to 1.6  
Section 3 - Green Belt - para 3.1 to 3.10  
Section 4 - Overall Development Strategy - para 4.1 to 4.5  
Section 5 - Sustainability Appraisal - para 5.1 to 5.11  
Section 7 - Conclusions - para 7.1 to 7.6  
Appendix 2 - para 1.1 to 6.11 plus appendices  
Appendix 3 - para 1.1 to 5.6  
Appendix 4 - Executive summary, para 1.1 to 4.3

Change To Plan: 1. Green Belt Study and SA Addendum Report to be revisited to ensure that a consistent approach is adopted for the consideration of all reasonable alternative urban edge sites.  
2. Balance between weighting given to sustainability and weighting given to the protection of the Green Belt to be reviewed in order to deliver a sustainable development strategy in accordance with the most sustainable option set out in the councils Housing Strategy Update.  
3. Sustainability balance to be reviewed in light of flaws.

Legally Compliant?: Yes

Full Reference: O - 65514 - 25320 - PM/CC/2/D - i, ii, iii

**65625 Object**

**Respondent: Pembroke College & the Balaam Family [21173]**

**Agent: Bidwells LLP (Susan Chappell) [25316]**

Summary: In summary, we do not consider that the Plans achieve the right balance of development and that greater flexibility is required to enable housing growth to be accommodated in the villages. Until such changes are adopted, the Plan remains unsound.

Change To Plan: Pembroke College and The Balaam Family considers that the following changes are required to the wording of Para 2.30:

The conclusion of the consideration of reasonable site options for development on the edge of Cambridge is to require development away from the edge of Cambridge to meet the remaining development needs of the wider Cambridge area. The sustainability appraisal of broad locations undertaken as part of the joint work endorsed by the JST&SPG demonstrates that new settlements and villages are the next most sustainable locations for growth. This appraisal was updated in 2015, to take account of new evidence prepared in response to the Inspectors during the Local Plan Examination.

This change in strategy will also need to be reflected elsewhere in the Plan.

In light of the suggested changes, there are a number of deliverable sites in village locations which should be considered for allocation. Land to the East of Linton, is considered to be one such deliverable site.

Legally Compliant?: No

Full Reference: O - 65625 - 21173 - PM/CC/2/D - i, ii, iv

## 65654 Object

**Respondent: Pembroke College & the Balaam Family [21173]**

**Agent: Bidwells LLP (Susan Chappell) [25316]**

Summary: The Sustainability Appraisal 2015 fails to recognise the important contribution that housing in villages makes towards achieving housing growth and:

\* Is overly reliant on New Settlements which pose serious deliverability issues.

\* Back loaded resulting in 5 year land supply issues.

\* Fails to recognise the import infrastructure new housing in villages delivers.

The strategy should be amended so that it allows for greater flexibility in the villages to accommodate more than just 'limited development' and recognise the contribution that housing in villages can make, even in a complimentary capacity. Residential development on Land off Pembroke Way, Teversham would contribute towards this.

Change To Plan: Pembroke College considers that the following changes are required to the wording of Para 2.30:

The conclusion of the consideration of reasonable site options for development on the edge of Cambridge is to require development away from the edge of Cambridge to meet the remaining development needs of the wider Cambridge area. The sustainability appraisal of broad locations undertaken as part of the joint work endorsed by the JST&SPG demonstrates clearly that new settlements are the next most sustainable locations for growth and will be supplemented by housing allocations in the more sustainable villages. that development in villages should be limited for sustainability reasons. This appraisal was updated in 2015, to take account of new evidence prepared in response to the Inspectors during the Local Plan Examination.

This change in strategy will also need to be reflected elsewhere in the Plan.

In light of the suggested changes, there are a number of deliverable sites in village locations which should be considered for allocation. Land to the East of Linton, is considered to be one such deliverable site.

Legally Compliant?: No

Full Reference: O - 65654 - 21173 - PM/CC/2/D - i

## 65751 Object

**Respondent: Coalition of Parish Councils (Mr Steve Jones) [25442]**

**Agent: N/A**

Summary: Delivering sustainable development in new settlements faces significant challenges. These include providing the infrastructure, facilities and services needed to make them viable. The challenges are especially significant in smaller new settlements, like Bourn Airfield.

Little evidence is provided as to the effectiveness, sustainability, or viability of the A428 corridor to new settlements and segregated busway between West Cambourne and Bourn Airfield.

1) A segregated busway will not make the new settlements sustainable.

2) The busway plans are at an early stage and the case is not proven.

3) The importance of an all-ways interchange at Girton/Madingley.

This was also not analysed in detail in the CSRM Transport Report.

Paragraphs 32 to 40 of the supporting document.

Change To Plan: Amend modification due to reasons set out above.

Legally Compliant?: Not Specified

Full Reference: O - 65751 - 25442 - PM/CC/2/D - i, iii

## 65811 Object

**Respondent:** Hardwick Parish Council (Mrs G Stoehr) [1891]

**Agent:** N/A

**Summary:** Delivering sustainable development in new settlements faces significant challenges. These include providing the infrastructure, facilities and services needed to make them viable. The challenges are especially significant in smaller new settlements, like Bourn Airfield.

Little evidence is provided as to the effectiveness, sustainability, or viability of the A428 corridor to new settlements and segregated busway between West Cambourne and Bourn Airfield.

- 1) A segregated busway will not make the new settlements sustainable.
- 2) The busway plans are at an early stage and the case is not proven.
- 3) The importance of an all-ways interchange at Girton/Madingley.

This was also not analysed in detail in the CSRM Transport Report.

Paragraphs 32 to 40 of the supporting document.

**Change To Plan:** Amend modification due to reasons set out above.

**Legally Compliant?:** Not Specified

**Full Reference:** O - 65811 - 1891 - PM/CC/2/D - i, iii

## 65820 Object

**Respondent:** Caxton Parish Council (Mrs Gail Stoehr) [1153]

**Agent:** N/A

**Summary:** Delivering sustainable development in new settlements faces significant challenges. These include providing the infrastructure, facilities and services needed to make them viable. The challenges are especially significant in smaller new settlements, like Bourn Airfield.

Little evidence is provided as to the effectiveness, sustainability, or viability of the A428 corridor to new settlements and segregated busway between West Cambourne and Bourn Airfield.

- 1) A segregated busway will not make the new settlements sustainable.
- 2) The busway plans are at an early stage and the case is not proven.
- 3) The importance of an all-ways interchange at Girton/Madingley.

This was also not analysed in detail in the CSRM Transport Report.

Paragraphs 32 to 40 of the supporting document.

**Change To Plan:** Amend modification due to reasons set out above.

**Legally Compliant?:** Not Specified

**Full Reference:** O - 65820 - 1153 - PM/CC/2/D - i, iii

## 65921 Object

**Respondent:** Cambridge Past Present and Future (Ms Stacey Weiser) [20942]

**Agent:** N/A

**Summary:** 2015 Sustainability Appraisal Addendum Report shows urban extensions were likely to be more sustainable than new settlements - closer proximity to city and facilities, although generate significant infrastructure problems. Council's opinion, more than outweighed by harm to setting of city through Green Belt release. Support Council's prioritisation of Green Belt.

In light of Memorandum of Understanding for joint housing trajectory and Development Strategy Update, no compelling reason why Council retained GB1 and GB2 - urban extensions in Green Belt. Should be deleted.

Impact on city's Heritage was not given adequate consideration. Extensive urban extensions more harmful than new settlements. This would probably further reinforce the Council's development sequence.

**Change To Plan:**

**Legally Compliant?:** Not Specified

**Full Reference:** O - 65921 - 20942 - PM/CC/2/D - None

## 65118 Support

**Respondent:** Dr Roger Sewell [25099]

**Agent:** N/A

Summary: I'm glad that the vast majority of the Green Belt is being protected.

Change To Plan:

Legally Compliant?: Not Specified

Full Reference: S - 65118 - 25099 - PM/CC/2/D - None

## 65190 Support

**Respondent:** Residents' Association of Old Newnham (Gillian Moore) [25297]

**Agent:** N/A

Summary: The 94 RAON members were emailed on 18.12.15 with a summary of the proposed amendments to the Local Plan. The RAON committee proposed that the RAON support all the amendments. Members had until 15.1.16 to disagree with this proposal, but not one member disagreed.

Some members advocate the expansion of the market towns around Cambridge - Newmarket, Haverhill, etc. - to reduce the pressure on Cambridge to expand. This would require investment in public transport.

Change To Plan:

Legally Compliant?: Not Specified

Full Reference: S - 65190 - 25297 - PM/CC/2/D - None

## 65266 Support

**Respondent:** Rustat Road Neighbourhood Association (Mr Roger Crabtree) [16745]

**Agent:** N/A

Summary: We are pleased that the additional work supports the Councils' previous position, and support the strategy of developing new sites beyond the Green Belt rather than further encroachments into it.

Change To Plan:

Legally Compliant?: Not Specified

Full Reference: S - 65266 - 16745 - PM/CC/2/D - None

## 65361 Support

**Respondent:** Trumpington Residents Association (Andrew Roberts) [5312]

**Agent:** N/A

Summary: The Trumpington Residents' Association supports the proposed addition to paragraph 2.30 and the new evidence prepared by the Councils.

Change To Plan:

Legally Compliant?: Not Specified

Full Reference: S - 65361 - 5312 - PM/CC/2/D - None

**65252 Object**

**Respondent:** Dr C Grant [22459]

**Agent:** N/A

Summary: This implies the green belt designation around Cambridge must be respected but villages such as Waterbeach where there may be considerable development have not had the benefit of additional green belt designation being considered. Indeed open space between the village and the proposed development site has now been given planning permission/is being built on which makes it essential that additional land is designated as green belt to give the existing village some protection and not just to provide restraint in the Denny Abbey vicinity.

Change To Plan: That existing villages are given some green belt type of protection to give them separation from proposed major developments. This is particularly important for Waterbeach

Legally Compliant?: Yes

Full Reference: O - 65252 - 22459 - PM/CC/2/E - i

**65411 Object**

**Respondent:** Pigeon Land & LIH [25320]

**Agent:** CODE Development Planners Ltd (Ms Karen Beech) [25295]

Summary: 1. Land south of CBC is provisionally allocated for employment but we are unable to find any evidence to explain the exceptional circumstances justifying the release of this land from the Green Belt.

2. Further investigation will be required and we look forward to reviewing the results of the council's further consideration of the delivery and sustainability of the provisional allocation on the CBC extension.

3. The provisional allocation of land to the south of CBC is not sufficient to meet the needs of the bio-medical and healthcare life sciences research needing to be located in close proximity to CBC and Addenbrooke's.

Relevant sections of attached document:

Executive summary, Section 1 - Introduction - para 1.1 to 1.6, Section 6 - Provisional Allocation of Land for CBC Extension, Section 7 - Conclusions - para 7.1 to 7.6, Appendix 1, Appendix 5.

Change To Plan: A proper assessment to be undertaken of employment land requirements, supply and delivery for the specific employment sector of bio-medical, healthcare and life sciences requiring a location in close proximity to CBC and Addenbrooke's Hospital and the allocation of more land, such as Cambridge South, for medical based R&D employment use close to CBC and Addenbrooke's Hospital.

Legally Compliant?: Yes

Full Reference: O - 65411 - 25320 - PM/CC/2/E - i, ii, iii, iv

**65687 Object**

**Respondent:** Paul Beskeen [22409]

**Agent:** N/A

Summary: The new evidence and Main Modifications fail to properly address the Inspector's concerns of the original work related to the review of the Inner Green Belt Boundary (2012), in particular the clarity of the Green Belt Review methodology, and the role of the Sustainability Appraisal/Strategic Environmental Assessment (SA/SEA) process.

Change To Plan: Delete the modification.

Legally Compliant?: Not Specified

Full Reference: O - 65687 - 22409 - PM/CC/2/E - i, iii, iv

## 65748 Object

**Respondent: Coalition of Parish Councils (Mr Steve Jones) [25442]**

**Agent: N/A**

Summary: Green Belt Review does not explain "why the protection of Green Belt should outweigh all other considerations".

In order to respond to the Inspectors' questions the authors of the review would have needed to assess the cost of the current policy and demonstrate that the benefits of keeping the policy clearly outweigh the costs of doing so by:

\*adding additional assessment criteria,

\*assessing the relative of all criteria and areas of Green Belt,

\*Estimating the cost of Green Belt loss against new settlement creation (cost-benefit analysis),

\*Analysing the adverse impacts of new settlement creation in terms of transport and infrastructure'.

Paragraphs 17 to 20 of supporting document.

Change To Plan: Amend modification due to reasons set out above.

Legally Compliant?: Not Specified

Full Reference: O - 65748 - 25442 - PM/CC/2/E - i, iii

## 65813 Object

**Respondent: Hardwick Parish Council (Mrs G Stoehr) [1891]**

**Agent: N/A**

Summary: Green Belt Review does not explain "why the protection of Green Belt should outweigh all other considerations".

In order to respond to the Inspectors' questions the authors of the review would

have needed to assess the cost of the current policy and demonstrate that the benefits of keeping the policy clearly outweigh the costs of doing so by:

\*adding additional assessment criteria,

\*assessing the relative of all criteria and areas of Green Belt,

\*Estimating the cost of Green Belt loss against new settlement creation (cost-benefit analysis),

\*Analysing the adverse impacts of new settlement creation in terms of transport and infrastructure'.

Paragraphs 17 to 20 of supporting document.

Change To Plan: Amend modification due to reasons set out above.

Legally Compliant?: Not Specified

Full Reference: O - 65813 - 1891 - PM/CC/2/E - i, iii

## 65818 Object

**Respondent: Caxton Parish Council (Mrs Gail Stoehr) [1153]**

**Agent: N/A**

Summary: Green Belt Review does not explain "why the protection of Green Belt should outweigh all other considerations".

In order to respond to the Inspectors' questions the authors of the review would have needed to assess the cost of the current policy and demonstrate that the benefits of keeping the policy clearly outweigh the costs of doing so by:

\*adding additional assessment criteria,

\*assessing the relative of all criteria and areas of Green Belt,

\*Estimating the cost of Green Belt loss against new settlement creation (cost-benefit analysis),

\*Analysing the adverse impacts of new settlement creation in terms of transport and infrastructure'.

Paragraphs 17 to 20 of supporting document.

Change To Plan: Amend modification due to reasons set out above.

Legally Compliant?: Not Specified

Full Reference: O - 65818 - 1153 - PM/CC/2/E - i, iii

## 65915 Object

**Respondent: The Quay Estate [25458]**

**Agent: Carter Jonas LLP (Mr Richard Seamark) [15727]**

Summary: Exceptional circumstances do exist for Green Belt release to support new jobs and homes. The Edge of Cambridge offers greater opportunities for delivering sustainable development than in New Settlements. Inner Green Belt Review 2015 fails to consider the relationship between the Green Belt and sustainable development. The Sustainability Appraisal Addendum fails to consider the consequences of not meeting housing needs and directing development away from Cambridge to new settlements. Alternative development scenarios have not been adequately assessed in terms of calculating the net sustainability benefit of major development on the Edge of Cambridge vs. the anticipated benefits arising from New Settlements.

New settlements result in higher S106/CIL contributions.  
No further safeguarded land has not been put forward (contrary to NPPF 85).

Our site (Appendix A) should be released from the Green Belt to accomodate further housing.

Change To Plan: We request that the Green Belt boundary should be reassessed in conjunction with the delivery of sustainable development, and in particular meeting full objectively assessed housing and employment needs and whether safeguarded land needs to be identified. We request that the Site should be released from the Green Belt, and allocated for development or identified as safeguarded land to meet long term development needs. The issue of safeguarded land has not been properly considered in Draft SCLP or the supporting evidence.

Legally Compliant?: Not Specified

Full Reference: O - 65915 - 25458 - PM/CC/2/E - i, ii, iii, iv

## 65951 Object

**Respondent: St Johns College [3084]**

**Agent: Savills (Mr Garth Hanlon) [963]**

Summary: We do not consider that the methodology used in the Green Belt Study 2015 is appropriate and that the conclusions drawn are correct:  
\*the methodology applied is not considered to be NPPF compliant.  
\*sectors have been subdivided - it does not necessarily follow that each part within those sub-areas would make an equal contribution to each of the qualities of the Green Belt.  
\*there is a degree of overlap between a number of selected qualities and they are identified to be of equal weight when some of considered to be more important.  
\*The reasons set out for not applying a scoring system are not considered adequate.

If the findings of the Green Belt studies undertaken in 2002, 2012 and 2015 are incorrect and the wrong conclusions are drawn, then questions can be asked as to the soundness of the plan.

Meadow Triangle Site fulfils minimal function in preserving the special character of Cambridge. The Local Plan should remove this site from the Green Belt.

Change To Plan: Amend modification.

Legally Compliant?: Not Specified

Full Reference: O - 65951 - 3084 - PM/CC/2/E - i



## 65996 Object

**Respondent: Commercial Estates Group [17653]**

**Agent: Nathaniel Lichfield & Partners (Mr Matthew Spry) [20555]**

Summary: Inner Green Belt Review (2015) and updated transport modelling is flawed for reasons in Green Belt and Transport Technical Papers (Appendices 3 and 4).

Scope to accommodate development beyond locations already identified in sustainable locations on edge of City, and in accordance with Councils' own sustainable development sequence more land on edge of City should be identified.

CEG does not agree options testing was carried out on an equal basis given the way development on edge of Cambridge was assessed and options which were assumed as basis to test how this could come forward.

Representation supported by summary document and technical papers, including Development Prospectus (Appendix 7) which sets out proposals for an initial phase of development at Cambridge South East.

Relevant Attachment

Cambridge South East 1.4 Section 2, Section 3 and 3 (Green Belt), 4 (Transport), 6 (SA Review) and 7 (Development Prospectus)

Change To Plan: Amend modification

Legally Compliant?: Not Specified

Full Reference: O - 65996 - 17653 - PM/CC/2/E - i, ii, iii, iv

## 66019 Object

**Respondent: St Johns College [3084]**

**Agent: Savills (Mr Garth Hanlon) [963]**

Summary: Do not consider Green Belt Study methodology is appropriate or correct conclusions drawn. Methodology is not NPPF compliant - Green Belt should not need to be altered beyond end of plan period 2031 - not considered. Too many different criteria used to consider Green Belt qualities - overlap and should not have equal weight. Should have used a scoring system to provide more transparent way of identifying relative importance of different parts of Green Belt. Clients' site is Grange Farm - have submitted Landscape and Visual Assessment. Conclusions from Qualities 1,7 and 16 considered important. Site suitable for release from Green Belt.

Change To Plan:

Legally Compliant?: Not Specified

Full Reference: O - 66019 - 3084 - PM/CC/2/E - i, ii, iii, iv

## 66109 Object

**Respondent: Grosvenor Developments Ltd and USS [25482]**

**Agent: Savills (Mr Colin Campbell) [15804]**

Summary: The Cambridge Inner Green Belt Boundary Study, LDA Design, November, 2015, is not an appropriate evidence base and does not overcome issues identified at the EiP.

As part of reviewing this report, a number of concerns relating to the methodology have been determined that skew the results for sector 7. The assessment of Sector 7 is not appropriate.

Change To Plan: Delete modification

Legally Compliant?: Not Specified

Full Reference: O - 66109 - 25482 - PM/CC/2/E - i, ii, iii

## 66127 Object

**Respondent:** Cambridgeshire County Council - Strategic Assets Team [25478]

**Agent:** Carter Jonas LLP (Brian Flynn) [17331]

Summary: Relevant paragraphs of supporting document: 15 to 16.

The methodology of the Inner Green Belt Review 2015 which supports this modification is not robust. We consider that addition land in this location could be released from the Green Belt in this location (Sub-Area 11.2).

Change To Plan: The methodology of the Inner Green Belt Review is not robust, and should be tested at a specific Green Belt Matter Session when the LP Examination resumes. We request that the Green Belt boundary should be reassessed in conjunction with the delivery of sustainable development and in particular meeting full objectively assessed housing needs. We request that land to the north of Babraham Road, west of Cherry Hinton Road/Limekiln Road and south of Worts' Causeway is released from the Green Belt and identified as a strategic site allocation.

Legally Compliant?: Not Specified

Full Reference: O - 66127 - 25478 - PM/CC/2/E - i, ii, iii, iv

## 66139 Object

**Respondent:** North Barton Road Land Owners Group [21302]

**Agent:** Carter Jonas LLP (Brian Flynn) [17331]

Summary: CSa, on behalf of North BRLOG, has undertaken an assessment of the Inner Green Belt Review 2015, and concludes that:

- It is bias towards 'setting'
- Exaggerates the 'unspoilt' nature of the views from the west of Cambridge
- Assumes that development would occur across North of Barton Road

The Local Plans CSRM Transport Report supports the merits of development on the edge of Cambridge.

The land to the North of Barton Road:

- Does not require transport measures to generate a high level of trips by walking and cycling.
- Provides an opportunity to facilitate sections of the radial and orbital routes proposed as City Deal projects.

Relevant attachments:

- CSa 2025\_05a LDA Green Belt Response.pdf
- Transport Technical Note - PBA LP Mods and SA
- 5352-L-05 Masterplan (3).pdf
- North BRLOG LP Mods Jan 2016.pdf : Paragraphs 24 to 28.pdf

Change To Plan: We request that:  
-the Green Belt boundary should be reassessed in conjunction with the delivery of sustainable development and in particular meeting full objectively assessed housing needs.  
-land North of Barton Road is released from the Green Belt and identified as a strategic site allocation.  
- the updated transport evidence is tested when the Matter 7: Transport Hearing Session is reconvened when the LP Examination process is reopened.

Legally Compliant?: Not Specified

Full Reference: O - 66139 - 21302 - PM/CC/2/E - i, ii, iv

## 66227 Object

**Respondent:** Cambridgeshire County Council (Mr Stephen Conrad) [6303]

**Agent:** N/A

**Summary:** County's wish and intent to include 0.9ha farmstead in masterplanning exercise for GB1 and GB2 so farmstead may, when available, be fully integrated into development.

Council is aware of possible changes to NPPF which would support reuse of redundant sites in Green Belt.

Timeframe for release of farmstead may be different to GB2 but recognize importance of securing a comprehensive development of GB2 and thus inclusion of farmstead when vacated.

Making representations for release of Green Belt land between GB2 and Babraham Road Park & Ride site for housing since proposed boundary does not align with any prevailing landscape feature and it would thus appear arbitrary.

Change To Plan:

Legally Compliant?: Not Specified

Full Reference: O - 66227 - 6303 - PM/CC/2/E - None

## 65119 Support

**Respondent:** Dr Roger Sewell [25099]

**Agent:** N/A

**Summary:** Again, I am glad that the Green Belt is being protected.

Change To Plan:

Legally Compliant?: Not Specified

Full Reference: S - 65119 - 25099 - PM/CC/2/E - None

## 65129 Support

**Respondent:** Bridget Smith [17462]

**Agent:** N/A

**Summary:** IT IS GRATIFYING THAT THE HIGH LEVEL PROTECTION GIVEN TO THE GREEN BELT HAS BEEN UP HELD BY INDEPENDENT EXAMINATION

Change To Plan:

Legally Compliant?: Not Specified

Full Reference: S - 65129 - 17462 - PM/CC/2/E - None

## 65144 Support

**Respondent:** Historic England (Mr David Grech) [23622]

**Agent:** N/A

**Summary:** Historic England welcomes the preparation of this study, which we believe provides the necessary evidence base to underpin the decisions made in respect of further release of Green Belt land. Historic England supports the methodology adopted in this study, and agrees with the main findings set out in paragraph 0.4.2 of the study. We also accept the main conclusions of the study as set out in paragraphs 0.6.1 and 0.6.2 of the study.

Historic England confirm nothing that would undermine previously agreed SoCG concerning Green Belt.

Change To Plan:

Legally Compliant?: Not Specified

Full Reference: S - 65144 - 23622 - PM/CC/2/E - None

## 65191 Support

**Respondent:** Residents' Association of Old Newnham (Gillian Moore) [25297]

**Agent:** N/A

**Summary:** The 94 RAON members were emailed on 18.12.15 with a summary of the proposed amendments to the Local Plan. The RAON committee proposed that the RAON support all the amendments. Members had until 15.1.16 to disagree with this proposal, but not one member disagreed.

Some members advocate the expansion of the market towns around Cambridge - Newmarket, Haverhill, etc. - to reduce the pressure on Cambridge to expand. This would require investment in public transport.

Change To Plan:

Legally Compliant?: Not Specified

Full Reference: S - 65191 - 25297 - PM/CC/2/E - None

## 65231 Support

**Respondent:** Southacre, Latham and Chaucer Roads Residents Association (SOLACHRA) (Mr Ian Gaseltine) [25275]

**Agent:** N/A

Summary: SOLACHRA supports the view that it is unlikely that any development could be accommodated without substantial harm to Green Belt purposes. The land between the new housing in Trumpington and the M11 and on to Hauxton must remain countryside to separate the city from the development in Hauxton. A new P&amp;amp;R at the M11 junction would be a serious eyesore in approaching the city.

Change To Plan:

Legally Compliant?: Not Specified

Full Reference: S - 65231 - 25275 - PM/CC/2/E - None

## 65267 Support

**Respondent:** Rustat Road Neighbourhood Association (Mr Roger Crabtree) [16745]

**Agent:** N/A

Summary: We support a ban on further loss of Green Belt land

Change To Plan:

Legally Compliant?: Not Specified

Full Reference: S - 65267 - 16745 - PM/CC/2/E - None

## 65292 Support

**Respondent:** Campaign to Protect Rural England (CPRE) (Miss Shirley Fieldhouse) [17302]

**Agent:** N/A

Summary: CPRE supports the assessment of the Green Belt carried out by consultants LDA which confirms the need to continue to protect the Green Belt from major incursions.

Change To Plan:

Legally Compliant?: Not Specified

Full Reference: S - 65292 - 17302 - PM/CC/2/E - None

## 65362 Support

**Respondent:** Trumpington Residents Association (Andrew Roberts) [5312]

**Agent:** N/A

Summary: The Trumpington Residents' Association supports the additional paragraph and the conclusion that it is unlikely any additional development could be accommodated on the edge of the City without substantial harm to Green Belt purposes. We are particularly concerned about the remaining Green Belt to the south west and south of Trumpington, including sites CCSC1003 (west of Hauxton Road, south of the approved Trumpington Meadows development), CCSC1004 (south of Glebe Farm/Addenbrooke's Road) and CC904 (south of Glebe Farm/Addenbrooke's Road, eastern end), where additional development would have undermined the purposes of the Green Belt.

Change To Plan:

Legally Compliant?: Not Specified

Full Reference: S - 65362 - 5312 - PM/CC/2/E - None

## 65624 Support

**Respondent:** Ms Lisa Buchholz [25390]

**Agent:** N/A

Summary: I strongly agree with the Council's assertion that beyond locations already identified, further development cannot be accommodated without substantial harm to Green Belt purposes.

Change To Plan:

Legally Compliant?: Not Specified

Full Reference: S - 65624 - 25390 - PM/CC/2/E - None

## 65629 Support

**Respondent:** John Preston [25375]

**Agent:** N/A

Summary: There should be no further releases from the Green Belt. It is vital that this is retained to preserve the setting of the historic city.

Change To Plan:

Legally Compliant?: Not Specified

Full Reference: S - 65629 - 25375 - PM/CC/2/E - None

65677 Support

Respondent: Windsor Road Residents (Dr Ann Mullinger) [2490]

Agent: N/A

Summary: We strongly support the Overall Development Strategy, especially that there should be no more housing in Cambridge City's Green Belt. It is unlikely that any significant increase in the number of new houses beyond 14,000 could be achieved without harm to the green belt.

We support the Councils' claim that their Proposed Modifications are consistent with the revisions to National Planning Policy, produced after the Local Plans were first submitted for examination.

Change To Plan:

Legally Compliant?: Yes

Full Reference: S - 65677 - 2490 - PM/CC/2/E - None

65728 Support

Respondent: Jenny Blackhurst [25437]

Agent: N/A

Summary: I support this amendment.  
I am particularly concerned about the Southern Fringe, which has already seen amendments to the Green Belt in the last 10 years. The already-approved developments there are much needed but yet more removal of land from the Green Belt to permit yet more development would undermine the purposes of that Green Belt

Change To Plan:

Legally Compliant?: Not Specified

Full Reference: S - 65728 - 25437 - PM/CC/2/E - None

65922 Support

Respondent: Cambridge Past Present and Future (Ms Stacey Weiser) [20942]

Agent: N/A

Summary: We raised substantive concerns about the previous inner Green Belt review on the grounds that the assessment criteria did not conform to the NPPF, the lack of transparency, and poor consistency in the outcome. The 2015 study effectively answers these concerns and provides a sound basis for spatial planning of the housing requirement for Greater Cambridge.

Change To Plan:

Legally Compliant?: Not Specified

Full Reference: S - 65922 - 20942 - PM/CC/2/E - None

**65443 Object**

**Respondent: Bidwells (Miss Marcia Whitehead) [17324]**

**Agent: Bidwells LLP (Alison Barnes) [25318]**

Summary: Bidwells object to the Proposed Modifications to Table 2.2 since, despite the proposed changes to the proportion of housing across the development hierarchy, the strategy remains too heavily reliant on development at New Settlements where significant uncertainty exists with regard to deliverability.

The sustainability merits of sites on the edge of Green Belt have not been given sufficient consideration in sustainability terms due to the Councils' approach to the assessment of the Green Belt.

Consequently, Table 2.2 is unsound as it is not:

- \* positively prepared;
- \* justified as it is not based on a robust evidence base;
- \* consistent with National Policy.

Change To Plan: The Proposed Modifications to Table 2.2 should be deleted and replaced with the balance of housing across the hierarchy reviewed with more cautious delivery assumptions used for the New Settlements and having regard to a more fundamental Green Belt Review. Any resultant shortfalls in housing supply should then be addressed through further allocations on the Edge of Cambridge and Villages.

It is considered that this revised approach would enable the Council to meet the objectively assessed housing needs for Cambridge in full and boost significantly the supply of housing in accordance with the requirements of Government guidance in the NPPF paragraphs 47 and 159. As such, this will ensure that the Plan is Sound.

Legally Compliant?: No

Full Reference: O - 65443 - 17324 - PM/CC/2/F - i, ii, iv

**65505 Object**

**Respondent: Endurance Estates Limited [19174]**

**Agent: Bidwells LLP (Susan Chappell) [25316]**

Summary: Endurance Estates object to the Proposed Modifications to Table 2.2 since, despite the proposed changes to the proportion of housing across the development hierarchy, the strategy remains too heavily reliant on development at New Settlements where significant uncertainty exists with regard to deliverability.

The sustainability merits of sites on the edge of Green Belt have not been given sufficient consideration in sustainability terms due to the Councils' approach to the assessment of the Green Belt.

Consequently, Table 2.2 is unsound as it is not:

- \* positively prepared;
- \* justified as it is not based on a robust evidence base;
- \* consistent with National Policy.

Change To Plan: The Proposed Modifications to Table 2.2 should be deleted and replaced with the balance of housing across the hierarchy reviewed with more cautious delivery assumptions used for the New Settlements and having regard to a more fundamental Green Belt Review. Any resultant shortfalls in housing supply should be addressed through further allocations on the Edge of Cambridge and Villages.

This revised approach would enable the Council to meet the objectively assessed housing needs for Cambridge in full and boost significantly the supply of housing in accordance with the NPPF. As such, this will ensure that the Plan is Sound.

Legally Compliant?: No

Full Reference: O - 65505 - 19174 - PM/CC/2/F - i, ii, iv

65509 Object

Respondent: Emmanuel & Gonville & Caius [25384]

Agent: Bidwells LLP (Alison Barnes) [25318]

Summary: Emmanuel and Gonville & Caius object to the Proposed Modifications to Table 2.2 since, despite proposed changes to the proportion of housing across the development hierarchy, the strategy remains too heavily reliant on development at New Settlements where significant uncertainty exists with regard to deliverability.

The sustainability merits of sites on the edge of Green Belt have not been given sufficient consideration in sustainability terms due to the Councils' approach to the assessment of the Green Belt.

Table 2.2 is unsound as it isn't:  
\* positively prepared;  
\* justified as it is not based on a robust evidence base;  
\* consistent with National Policy.

Change To Plan: The Proposed Modifications to Table 2.2 should be deleted and replaced with the balance of housing across the hierarchy reviewed with more cautious delivery assumptions used for the New Settlements and having regard to a more fundamental Green Belt Review. Any resultant shortfalls in housing supply should then be addressed through further allocations on the Edge of Cambridge and Villages.

It is considered that this revised approach would enable the Council to meet the objectively assessed housing needs for Cambridge in full and boost significantly the supply of housing in accordance with the requirements of Government guidance in the NPPF paragraphs 47 and 159. As such, this will ensure that the Plan is Sound.

Legally Compliant?: No

Full Reference: O - 65509 - 25384 - PM/CC/2/F - i, ii, iv

65517 Object

Respondent: Pigeon Land & LIH [25320]

Agent: CODE Development Planners Ltd (Ms Karen Beech) [25295]

Summary: The development strategy and the percentage of development proposed in the second tier of sites in the settlement hierarchy (the edge of Cambridge) continues to be reliant on commitments carried forward from previous local plans.  
There are inconsistencies and inaccuracies in the assessment of the reasonable alternatives; the urban fringe sites, in both the Green Belt Assessment and the SA Addendum Report which has resulted in a skew towards the allocation of new settlements.  
The sustainability balance proposed in seeking to justify the dispersal of development into new settlements in South Cambridgeshire away from the centre of Cambridge is flawed

Relevant documents:160125\_CSTpt.pdf

Executive summary  
Section 1 - Introduction - para 1.1 to 1.6  
Section 3 - Green Belt - para 3.1 to 3.10  
Section 4 - Overall Development Strategy - para 4.1 to 4.5  
Section 5 - Sustainability Appraisal - para 5.1 to 5.11  
Section 7 - Conclusions - para 7.1 to 7.6  
Appendix 2 - para 1.1 to 6.11 plus appendices  
Appendix 3 - para 1.1 to 5.6  
Appendix 4 - Executive summary, para 1.1 to 4.3

Change To Plan: 1. Green Belt Study and SA Addendum Report to be revisited to ensure that a consistent approach is adopted for the consideration of all reasonable alternative urban edge sites.  
2. Balance between weighting given to sustainability and weighting given to the protection of the Green Belt to be reviewed in order to deliver a sustainable development strategy in accordance with the most sustainable option set out in the councils Housing Strategy Update.  
3. Sustainability balance to be reviewed in light of flaws

Legally Compliant?: Yes

Full Reference: O - 65517 - 25320 - PM/CC/2/F - i, ii, iii

## 65540 Object

**Respondent: Unwins and Biggs [25382]**

**Agent: Bidwells LLP (Alison Barnes) [25318]**

Summary: Unwins and Biggs object to the Proposed Modifications to Table 2.2 since, despite the proposed changes to the proportion of housing across the development hierarchy, the strategy remains too heavily reliant on development at New Settlements where significant uncertainty exists with regard to deliverability.

The sustainability merits of sites on the edge of Green Belt have not been given sufficient consideration in sustainability terms due to the Councils' approach to the assessment of the Green Belt.

Consequently, Table 2.2 is unsound as it isn't:

- \* positively prepared;
- \* justified as it is not based on a robust evidence base;
- \* consistent with National Policy.

Change To Plan: The Proposed Modifications to Table 2.2 should be deleted and replaced with the balance of housing across the hierarchy reviewed with more cautious delivery assumptions used for the New Settlements and having regard to a more fundamental Green Belt Review. Any resultant shortfalls in housing supply should then be addressed through further allocations on the Edge of Cambridge and Villages.

It is considered that this revised approach would enable the Council to meet the objectively assessed housing needs for Cambridge in full and boost significantly the supply of housing in accordance with the requirements of Government guidance in the NPPF paragraphs 47 and 159. As such, this will ensure that the Plan is Sound.

Legally Compliant?: No

Full Reference: O - 65540 - 25382 - PM/CC/2/F - i, ii, iv

## 65549 Object

**Respondent: Pembroke College & the Balaam Family [21173]**

**Agent: Bidwells LLP (Susan Chappell) [25316]**

Summary: Pembroke & the Balaam Family object to Proposed Modifications to Table 2.2 since, despite the proposed changes to the proportion of housing across the development hierarchy, the strategy remains too heavily reliant on development at New Settlements where significant uncertainty exists with regard to deliverability.

The sustainability merits of sites on the edge of Green Belt have not been given sufficient consideration in sustainability terms due to the Councils' approach to assessment of the Green Belt.

Table 2.2 is unsound as it is not:

- \* positively prepared;
- \* justified as it is not based on a robust evidence base;
- \* consistent with National Policy.

Change To Plan: The Proposed Modifications to Table 2.2 should be deleted and replaced with the balance of housing across the hierarchy reviewed with more cautious delivery assumptions used for the New Settlements and having regard to a more fundamental Green Belt Review. Any resultant shortfalls in housing supply should then be addressed through further allocations on the Edge of Cambridge and Villages.

It is considered that this revised approach would enable the Council to meet the objectively assessed housing needs for Cambridge in full and boost significantly the supply of housing in accordance with the requirements of Government guidance in the NPPF paragraphs 47 and 159. As such, this will ensure that the Plan is Sound.

Legally Compliant?: No

Full Reference: O - 65549 - 21173 - PM/CC/2/F - i, ii, iv



## 65923 Object

**Respondent: Cambridge Past Present and Future (Ms Stacey Weiser) [20942]**

**Agent: N/A**

Summary: CambridgePPF maintains its objection to the release of GB1 and GB2 for housing. Table 2.2 should be amended to delete the estimated housing yield from the development of these allocations in the plan.

The Council's own sustainability update shows that new settlements are a more sustainable form of development than urban extensions in the Green Belt. If the allocation of these 430 homes is considered essential, they should be included in the forward trajectories for the new settlements under the Memorandum of Understanding between the City and SCDC.

Change To Plan: Amend modification

Legally Compliant?: Not Specified

Full Reference: O - 65923 - 20942 - PM/CC/2/F - ii

## 65997 Object

**Respondent: Commercial Estates Group [17653]**

**Agent: Nathaniel Lichfield & Partners (Mr Matthew Spry) [20555]**

Summary: CEG maintains that the Objectively Assessed Housing Need (OAHN) for the HMA is greater than the Councils propose, and in particular the need in Cambridge City is greater than the 14,000 homes provided by the draft Cambridge Local Plan.

This representation is supported by a range of technical papers which form part of and support this representation, including a Technical Paper on OAHN (CEG Representation Appendix 2). This Paper provides a critique of the latest PBA assessment and sets out the reasons why the OAHN must be increased to 41,000 new homes if the jobs target of 44,000 is to be met.

Relevant Attachment

Cambridge South East 1.4 Section 2(a) - OAHN (2.2-2.13)

Appendix 2 (OAHN)

Change To Plan: Amend modification

Legally Compliant?: Not Specified

Full Reference: O - 65997 - 17653 - PM/CC/2/F - i, ii, iii, iv

## 65192 Support

**Respondent: Residents' Association of Old Newnham (Gillian Moore) [25297]**

**Agent: N/A**

Summary: The 94 RAON members were emailed on 18.12.15 with a summary of the proposed amendments to the Local Plan. The RAON committee proposed that the RAON support all the amendments. Members had until 15.1.16 to disagree with this proposal, but not one member disagreed.

Some members advocate the expansion of the market towns around Cambridge - Newmarket, Haverhill, etc. - to reduce the pressure on Cambridge to expand. This would require investment in public transport.

Change To Plan:

Legally Compliant?: Not Specified

Full Reference: S - 65192 - 25297 - PM/CC/2/F - None

**65373 Object**      **Respondent: Mrs. Marie-Thérèse Gough-Goodman [25339]**      **Agent: N/A**

Summary: Previous consultations on the development of GB1 and GB2 have been fiercely opposed, but ignored. The well-informed comments by various experts objecting to the development have been discarded in council. GB1 and GB2 in particular were proven to be unsuitable for development. It is a shame that Cambridge is succumbing to lazy planning, therefore destroying the uniqueness of the city's character. I object again. Please refer to my previous objections.

- Traffic chaos
- No amenities
- Develop brown-field sites before green belt
- Cambridge as a dormitory town for London commuters and as a profiteering opportunity for investors

Change To Plan: Remove GB1 and GB2 from the local plan and Annual Monitoring Report.

Legally Compliant?: No

Full Reference: O - 65373 - 25339 - PM/CC/2/G - i, ii, iii, iv

**65413 Object**      **Respondent: David Blake [25352]**      **Agent: N/A**

Summary: Housing numbers are incorrect and there is no exceptional need to develop GB1 and GB2.

Change To Plan: I would like to request the amendment of this modification to remove the Green Belt sites at Worts' Causeway, and for the further modification of the Plan to remove them from the sites listing.

Legally Compliant?: No

Full Reference: O - 65413 - 25352 - PM/CC/2/G - i, ii, iii, iv

**65435 Object**      **Respondent: Pigeon Land & LIH [25320]**      **Agent: CODE Development Planners Ltd (Ms Karen Beech) [25295]**

Summary: The level of objectively assessed housing need has been under-estimated for:

1. The demographic projections have not been adjusted to take account of the assumption that household formation amongst younger households is suppressed.
2. Economic growth expectations have not been addressed so there is a misalignment between jobs and homes.
3. Significant key market signals; land values and past under delivery have not been considered.
4. No adjustment has been made to take account of the level of affordable housing need.
5. The full objectively assessed housing requirement for Cambridge is 15,200 dwellings and for South Cambridgeshire is 27,000 dwellings.

Relevant documents:  
\*GLHearn Report - Whole Document  
\*160125\_CSTpt.pdf - Executive summary; Section 1 - Introduction - para 1.1 to 1.6; Section 2 - OAHN & Housing Need - Section 2.1 (2.1.1 to 2.1.13); Section 7 - Conclusions - para 7.1 to 7.6

Change To Plan: In order to make the Local Plans sound in respect of objectively assessed housing needs, the housing requirement should be increased to reflect the full objectively assessed housing need resulting in a figure of 15,200 in Cambridge and 27,000 in South Cambridgeshire.

Legally Compliant?: Yes

Full Reference: O - 65435 - 25320 - PM/CC/2/G - i, ii, iii, iv

65453 Object

Respondent: Bidwells (Miss Marcia Whitehead) [17324]

Agent: Bidwells LLP (Alison Barnes) [25318]

Summary: Bidwells object to the Proposed Modification to Policy 3 proposing a joint housing trajectory for Cambridge and South Cambridgeshire for the purposes of phasing of housing delivery including for calculating the 5-year housing land supply.

However, this approach does not comply with the NPPF which requires that, to boost significantly the supply of housing, local planning authorities should identify and update annually a supply of specific deliverable sites sufficient to provide five years' worth of housing against their housing requirements.

Consequently, the Proposed Modification is unsound in that it is not:

- \* positively prepared;
- \* consistent with National Policy.

Change To Plan: The Proposed Modification to Policy 3 should be deleted and replaced with any shortfall in the two Council's housing land supply should be addressed through further allocations within the Plan.

It is considered that this revised approach would enable the Council to meet the objectively assessed housing needs for Cambridge in full and boost significantly the supply of housing in accordance with the requirements of Government guidance in the NPPF paragraphs 47 and 159. As such, this will ensure that the Plan is Sound.

Legally Compliant?: No

Full Reference: O - 65453 - 17324 - PM/CC/2/G - i, iv

65506 Object

Respondent: Endurance Estates Limited [19174]

Agent: Bidwells LLP (Susan Chappell) [25316]

Summary: Endurance Estates object to the Proposed Modification to Policy 3 proposing a joint housing trajectory for Cambridge and South Cambridgeshire for the purposes of phasing of housing delivery including for calculating the 5-year housing land supply.

However, this approach does not comply with the NPPF which requires that, to boost significantly the supply of housing, local planning authorities should identify and update annually a supply of specific deliverable sites sufficient to provide five years' worth of housing against their housing requirements.

Consequently, the Proposed Modification is unsound in that it is not:

- \* positively prepared;
- \* consistent with National Policy.

Change To Plan: The Proposed Modification to Policy 3 should be deleted and replaced with any shortfall in the two Council's housing land supply should be addressed through further allocations within the Plan.

It is considered that this revised approach would enable the Council to meet the objectively assessed housing needs for Cambridge in full and boost significantly the supply of housing in accordance with the requirements of Government guidance in the NPPF paragraphs 47 and 159. As such, this will ensure that the Plan is Sound.

Legally Compliant?: No

Full Reference: O - 65506 - 19174 - PM/CC/2/G - i, iv

65512 Object

Respondent: Emmanuel & Gonville & Caius [25384]

Agent: Bidwells LLP (Alison Barnes) [25318]

Summary: Emmanuel and Gonville & Caius object to the Proposed Modification to Policy 3 proposing a joint housing trajectory for Cambridge and South Cambridgeshire for the purposes of phasing of housing delivery including for calculating the 5-year housing land supply.

However, this approach does not comply with the NPPF which requires that, to boost significantly the supply of housing, local planning authorities should identify and update annually a supply of specific deliverable sites sufficient to provide five years' worth of housing against their housing requirements.

Consequently, the Proposed Modification is unsound in that it isn't:

- \* positively prepared;
- \* consistent with National Policy.

Change To Plan: The Proposed Modification to Policy 3 should be deleted and replaced with any shortfall in the two Council's housing land supply should be addressed through further allocations within the Plan.

It is considered that this revised approach would enable the Council to meet the objectively assessed housing needs for Cambridge in full and boost significantly the supply of housing in accordance with the requirements of Government guidance in the NPPF paragraphs 47 and 159. As such, this will ensure that the Plan is Sound.

Legally Compliant?: No

Full Reference: O - 65512 - 25384 - PM/CC/2/G - i, iv

65545 Object

Respondent: Unwins and Biggs [25382]

Agent: Bidwells LLP (Alison Barnes) [25318]

Summary: Unwins and Biggs object to the Proposed Modification to Policy 3 proposing a joint housing trajectory for Cambridge and South Cambridgeshire for the purposes of phasing of housing delivery including for calculating the 5-year housing land supply.

However, this approach does not comply with the NPPF which requires that, to boost significantly the supply of housing, local planning authorities should identify and update annually a supply of specific deliverable sites sufficient to provide five years' worth of housing against their housing requirements.

Consequently, the Proposed Modification is unsound in that it is not:

- \* positively prepared;
- \* consistent with National Policy.

Change To Plan: The Proposed Modification to Policy 3 should be deleted and replaced with any shortfall in the two Council's housing land supply should be addressed through further allocations within the Plan.

It is considered that this revised approach would enable the Council to meet the objectively assessed housing needs for Cambridge in full and boost significantly the supply of housing in accordance with the requirements of Government guidance in the NPPF paragraphs 47 and 159. As such, this will ensure that the Plan is Sound.

Legally Compliant?: No

Full Reference: O - 65545 - 25382 - PM/CC/2/G - i, iv

## 65560 Object

**Respondent: Pembroke College & the Balaam Family [21173]**

**Agent: Bidwells LLP (Susan Chappell) [25316]**

Summary: Pembroke College & the Balaam Family object to Proposed Modification to Policy 3 proposing a joint housing trajectory for Cambridge and South Cambridgeshire for the purposes of phasing of housing delivery including for calculating the 5-year housing land supply.

However, this approach does not comply with the NPPF which requires that, to boost significantly the supply of housing, local planning authorities should identify and update annually a supply of specific deliverable sites sufficient to provide five years' worth of housing against their housing requirements.

Consequently, the Proposed Modification is unsound in that it is not:

- \* positively prepared;
- \* consistent with National Policy.

Change To Plan: The Proposed Modification to Policy 3 should be deleted and replaced with any shortfall in the two Council's housing land supply should be addressed through further allocations within the Plan.

It is considered that this revised approach would enable the Council to meet the objectively assessed housing needs for Cambridge in full and boost significantly the supply of housing in accordance with the requirements of Government guidance in the NPPF paragraphs 47 and 159. As such, this will ensure that the Plan is Sound.

Legally Compliant?: No

Full Reference: O - 65560 - 21173 - PM/CC/2/G - i, iv

## 65619 Object

**Respondent: Dr Barry Rosen [25299]**

**Agent: N/A**

Summary: Based on an over-estimated OAN which does not correspond to real independently assessed need, there are no "exceptional circumstances" for release of GB1 and GB2 greenbelt land

Change To Plan: Removal of GB1 and GB2 from Greenbelt release, as there is no demonstrated "exceptional need" and not consistent with NPPF policy

Legally Compliant?: Yes

Full Reference: O - 65619 - 25299 - PM/CC/2/G - iv

## 65697 Object

**Respondent: Mr Jeremy Jones [25348]**

**Agent: N/A**

Summary: Cambridge CC's proposal that there are exceptional circumstances to justify Green Belt release of two sites for housing is inconsistent with National Policy.

Modifications to the LP sites see inclusion of additional land availability and adjustments to historic performance which sees the total provision of dwellings reach 14,682. Based on PBA's assessment that 13,090 reflects trends and market signals this additional land availability and performance updates mean that GB1 and GB2 are no longer required to reach the 14,000 target. Removing both GB1 and GB2 would still allow the Council to reach 14,252 against its 14,000 target. Thus, no longer justifying the existence of exceptional circumstances on the basis of need to trigger Green Belt release

Change To Plan: I would like to request the amendment of this modification to remove the Green Belt sites at Worts' Causeway, and for the further modification of the Plan to remove them from the sites listing.

Legally Compliant?: Not Specified

Full Reference: O - 65697 - 25348 - PM/CC/2/G - iv

## 65924 Object

**Respondent: Cambridge Past Present and Future (Ms Stacey Weiser) [20942]**

**Agent: N/A**

Summary: The two small sites on Worts Causeway, GB1 and GB2, should be deleted (see our responses to PM/CC/2/D and F)

Change To Plan: Amend modification

Legally Compliant?: Not Specified

Full Reference: O - 65924 - 20942 - PM/CC/2/G - ii

## 65998 Object

**Respondent: Commercial Estates Group [17653]**

**Agent: Nathaniel Lichfield & Partners (Mr Matthew Spry) [20555]**

Summary: Notwithstanding discussions in the Examination sessions to date, the modifications do not include a clear commitment to an early review of the Plans in 2019.

If the Plans are to progress based on a joint housing trajectory, this must only be on the basis of a clear commitment to an early review, which will include a further review of the Cambridge Green Belt given the concerns regarding the methodology and outcome of Green Belt reviews undertaken to date (see accompanying technical paper and earlier representations).

This representation is supported by a summary document and range of technical papers prepared by CEG which form part of and support this representation.

Relevant Attachment  
Cambridge South East 1.4 3.19-3.23 and  
All Appendix and 2(OAHN) and 3 (Green Belt) in particular

Change To Plan: Amend modification

Legally Compliant?: Not Specified

Full Reference: O - 65998 - 17653 - PM/CC/2/G - i, ii, iii, iv

## 66108 Object

**Respondent: Grosvenor Developments Ltd and USS [25482]**

**Agent: Savills (Mr Colin Campbell) [15804]**

Summary: Policy S/12 and combined trajectory does not accord with objective of a continuous high level of housing growth.

There is no justification for the approach - the NPPF requires that each LPA maintains a five year supply.

It will not be effective as it will have negative effects for the housing market

Change To Plan: Delete modificaiton

Legally Compliant?: Not Specified

Full Reference: O - 66108 - 25482 - PM/CC/2/G - i, ii, iii, iv

## 66131 Object

**Respondent: North Barton Road Land Owners Group [21302]**

**Agent: Carter Jonas LLP (Brian Flynn) [17331]**

Summary: The joint housing trajectory:

-Is a negative response to the housing land supply shortfall in South Cambridgeshire. It is not clear, for example, what action Cambridgeshire City Council could take if there is a housing shortfall against the joint housing trajectory caused by the failure to deliver development at the proposed new settlements in South Cambridgeshire;  
-Has not been assessed against sustainability objectives, particularly in terms of the potential negative impacts on affordable housing if there are delays to delivery at the new settlements. No alternatives to a joint housing trajectory have been considered or consulted on by the Councils.

Relevant attachments:  
-Jan Representations OAN (25.01.16).pdf  
-North BRLOG LP Mods Jan 2016.pdf : Paragraphs 20 to 21.pdf

Change To Plan: We request that all references to a joint housing trajectory are deleted from Draft CLP2014.

Legally Compliant?: Not Specified

Full Reference: O - 66131 - 21302 - PM/CC/2/G - i, ii, iv

## 65193 Support

**Respondent: Residents' Association of Old Newnham (Gillian Moore) [25297]**

**Agent: N/A**

Summary: The 94 RAON members were emailed on 18.12.15 with a summary of the proposed amendments to the Local Plan. The RAON committee proposed that the RAON support all the amendments. Members had until 15.1.16 to disagree with this proposal, but not one member disagreed.

Some members advocate the expansion of the market towns around Cambridge - Newmarket, Haverhill, etc. - to reduce the pressure on Cambridge to expand. This would require investment in public transport.

Change To Plan:

Legally Compliant?: Not Specified

Full Reference: S - 65193 - 25297 - PM/CC/2/G - None

**65293 Support**      **Respondent:** Campaign to Protect Rural England (CPRE) (Miss Shirley Fieldhouse)      **Agent:**    N/A  
[17302]

Summary: CPRE supports the provision of 14,000 additional dwellings within Cambridge City Council's administrative boundary over the period from April 2011 to March 2031.  
Change To Plan:  
Legally Compliant?: Not Specified

Full Reference: S - 65293 - 17302 - PM/CC/2/G - None

**65783 Support**      **Respondent:** Historic England (Mr David Grech) [23622]      **Agent:**    N/A

Summary: In respect of Housing Land Supply, Historic England has reviewed the revised housing allocation map (Figure 3.2) prepared by the Councils and again we do not wish to comment in detail on either the New Proposal site in the City or the New Proposal Site in SCDC.  
  
We therefore do not object to the main modifications proposed to the Cambridge Local Plan in respect of the Development Strategy as set out in paragraphs 2.40 and 2.41 of the Report.  
  
Change To Plan:  
Legally Compliant?: Not Specified  
Full Reference: S - 65783 - 23622 - PM/CC/2/G - None

**65408 Object**

**Respondent:** David Blake [25352]

**Agent:** N/A

Summary: Housing numbers are now over the requirement by 252. Exceptional circumstances are not met for the release of green belt land at GB1 and GB2.

Change To Plan: Housing numbers should be corrected in published tables and GB1 and B2 protected to remain as Green Belt land without building encroachment.

Legally Compliant?: No

Full Reference: O - 65408 - 25352 - PM/CC/2/H - i, ii, iii, iv

**65457 Object**

**Respondent:** Bidwells (Miss Marcia Whitehead) [17324]

**Agent:** Bidwells LLP (Alison Barnes) [25318]

Summary: Bidwells object to the Proposed Modifications to Paragraph 2.43 since it is considered that the revised paragraph provides an inaccurate assessment of the level of housing supply within the City. The level of capacity identified continues to rely on the development of a number of previously developed sites over which there is considerable uncertainty casting uncertainty as to whether the Plan's housing target of 14,000 dwellings will be delivered. As such, the Paragraph is not:

\* positively prepared;

\* justified as it is not based on a robust evidence base;

\* not consistent with National Policy.

Change To Plan: The Proposed Modifications to Paragraph 2.43 should be deleted and replaced, with a further review of the Council's housing supply undertaken to ensure that only specific deliverable sites are included within the Council's housing land supply. Any subsequent shortfall in the Council's housing supply should be addressed through further allocations within the Plan.

This revised approach would enable the Council to meet the objectively assessed housing needs for Cambridge in full and boost significantly the supply of housing in accordance with the requirements of NPPF paragraphs 47 and 159. As such, this will ensure that the Plan is Sound.

Legally Compliant?: No

Full Reference: O - 65457 - 17324 - PM/CC/2/H - i, ii, iv

**65508 Object**

**Respondent:** Endurance Estates Limited [19174]

**Agent:** Bidwells LLP (Susan Chappell) [25316]

Summary: Endurance Estates object to the Proposed Modifications to Paragraph 2.43 since it is considered that the revised paragraph provides an inaccurate assessment of the level of housing supply within the City. The level of capacity identified continues to rely on the development of a number of previously developed sites over which there is considerable uncertainty casting uncertainty as to whether the Plan's housing target of 14,000 dwellings will be delivered. As such, the Paragraph is not:

\* positively prepared;

\* justified as it is not based on a robust evidence base;

\* not consistent with National Policy.

Change To Plan: The Proposed Modifications to Paragraph 2.43 should be deleted and replaced, with a further review of the Council's housing supply undertaken to ensure that only specific deliverable sites are included within the Council's housing land supply. Any subsequent shortfall in the Council's housing supply should be addressed through further allocations within the Plan.

This revised approach would enable the Council to meet the objectively assessed housing needs for Cambridge in full and boost significantly the supply of housing in accordance with the requirements of NPPF paragraphs 47 and 159. As such, this will ensure that the Plan is Sound.

Legally Compliant?: No

Full Reference: O - 65508 - 19174 - PM/CC/2/H - i, ii, iv



65518 Object

Respondent: Emmanuel & Gonville & Caius [25384]

Agent: Bidwells LLP (Alison Barnes) [25318]

Summary: Emmanuel and Gonville & Caius object to the Proposed Modifications to Paragraph 2.43 since it is considered that the revised paragraph provides an inaccurate assessment of the level of housing supply within the City. The level of capacity identified continues to rely on the development of a number of previously developed sites over which there is considerable uncertainty casting uncertainty as to whether the Plan's housing target of 14,000 dwellings will be delivered. As such, the Paragraph is not:

- \* positively prepared;
- \* justified as it is not based on a robust evidence base;
- \* not consistent with National Policy.

Change To Plan: The Proposed Modifications to Paragraph 2.43 should be deleted and replaced, with a further review of the Council's housing supply undertaken to ensure that only specific deliverable sites are included within the Council's housing land supply. Any subsequent shortfall in the Council's housing supply should be addressed through further allocations within the Plan.

This revised approach would enable the Council to meet the objectively assessed housing needs for Cambridge in full and boost significantly the supply of housing in accordance with the requirements of NPPF paragraphs 47 and 159. As such, this will ensure that the Plan is Sound.

Legally Compliant?: No

Full Reference: O - 65518 - 25384 - PM/CC/2/H - i, ii, iv

65547 Object

Respondent: Unwins and Biggs [25382]

Agent: Bidwells LLP (Alison Barnes) [25318]

Summary: Unwins and Biggs object to the Proposed Modifications to Paragraph 2.43 since it is considered that the revised paragraph provides an inaccurate assessment of the level of housing supply within the City. The level of capacity identified continues to rely on the development of a number of previously developed sites over which there is considerable uncertainty casting uncertainty as to whether the Plan's housing target of 14,000 dwellings will be delivered. As such, the Paragraph is not:

- \* positively prepared;
- \* justified as it is not based on a robust evidence base;
- \* not consistent with National Policy.

Change To Plan: The Proposed Modifications to Paragraph 2.43 should be deleted and replaced, with a further review of the Council's housing supply undertaken to ensure that only specific deliverable sites are included within the Council's housing land supply. Any subsequent shortfall in the Council's housing supply should be addressed through further allocations within the Plan.

This revised approach would enable the Council to meet the objectively assessed housing needs for Cambridge in full and boost significantly the supply of housing in accordance with the requirements of NPPF paragraphs 47 and 159. As such, this will ensure that the Plan is Sound.

Legally Compliant?: No

Full Reference: O - 65547 - 25382 - PM/CC/2/H - i, ii, iv

|              |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |                                                               |
|--------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------|
| 65550 Object | Respondent: Pigeon Land & LIH [25320]                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   | Agent: CODE Development Planners Ltd (Ms Karen Beech) [25295] |
|              | Summary: We do not consider that Cambridge City and South Cambridgeshire should have a joint housing trajectory.                                                                                                                                                                                                                                                                                                                                                                                                                        |                                                               |
|              | South Cambridgeshire and Cambridge City have separate local plans and should therefore in our view have separate housing trajectories.                                                                                                                                                                                                                                                                                                                                                                                                  |                                                               |
|              | This was confirmed by the inspector who considered two planning appeals at Waterbeach and said in the decision letter, dated 25 June 2014, that a joint housing trajectory would not be the correct approach.                                                                                                                                                                                                                                                                                                                           |                                                               |
|              | Relevant documents:160125_CSTpt.pdf                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |                                                               |
|              | Executive summary                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |                                                               |
|              | Section 1 - Introduction - para 1.1 to 1.6                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |                                                               |
|              | Section 2 - OAHN & Housing Delivery - section 2.2 - para 2.2.1 to 2.2.5                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |                                                               |
|              | Section 4 - Overall Development Strategy - para 4.1 to 4.5                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |                                                               |
|              | Section 7 - Conclusions - para 7.1 to 7.6                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |                                                               |
|              | Change To Plan: Given that Cambridge City and South Cambridgeshire are preparing separate Local Plans, each should have their own housing trajectory.                                                                                                                                                                                                                                                                                                                                                                                   |                                                               |
|              | Legally Compliant?: Yes                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |                                                               |
|              | Full Reference: O - 65550 - 25320 - PM/CC/2/H - i, ii, iii                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |                                                               |
| 65561 Object | Respondent: Pembroke College & the Balaam Family [21173]                                                                                                                                                                                                                                                                                                                                                                                                                                                                                | Agent: Bidwells LLP (Susan Chappell) [25316]                  |
|              | Summary: Pembroke College & the Balaam Family object to the Proposed Modifications to Paragraph 2.43 since it is considered that the revised paragraph provides an inaccurate assessment of the level of housing supply within the City. The level of capacity identified continues to rely on the development of a number of previously developed sites over which there is considerable uncertainty casting uncertainty as to whether the Plan's housing target of 14,000 dwellings will be delivered. As such, the Paragraph is not: |                                                               |
|              | * positively prepared;                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |                                                               |
|              | * justified as it is not based on a robust evidence base;                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |                                                               |
|              | * not consistent with National Policy.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |                                                               |
|              | Change To Plan: The Proposed Modifications to Paragraph 2.43 should be deleted and replaced, with a further review of the Council's housing supply undertaken to ensure that only specific deliverable sites are included within the Council's housing land supply. Any subsequent shortfall in the Council's housing supply should be addressed through further allocations within the Plan.                                                                                                                                           |                                                               |
|              | This revised approach would enable the Council to meet the objectively assessed housing needs for Cambridge in full and boost significantly the supply of housing in accordance with the requirements of NPPF paragraphs 47 and 159. As such, this will ensure that the Plan is Sound.                                                                                                                                                                                                                                                  |                                                               |
|              | Legally Compliant?: No                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |                                                               |
|              | Full Reference: O - 65561 - 21173 - PM/CC/2/H - i, ii, iv                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |                                                               |

## 65623 Object

**Respondent: Dr Barry Rosen [25299]**

**Agent: N/A**

Summary: In line with my previous objection to modification PM/CC/2/G, I would like to request the amendment to paragraph 2.43 to reflect the removal of the Green Belt sites, as no justification of exceptional circumstances remains based on best indepent information

Change To Plan: The amendment should therefore change the paragraph to read:

"As of April 2015, there is planning permission for 7,036 new homes within the urban area and in the agreed urban extensions. There are a further 1,010 planned dwellings on existing allocated sites that do not have planning permission. Completions between 2011/12 and 2014/15 account for 2,860 dwellings. In addition, the Council's strategic housing land availability assessment (SHLAA), together with findings of the Councils' annual housing trajectory which assesses the capacity for future housing within the existing urban area, indicates capacity for a further 3,777 3,347 dwellings in the urban area of Cambridge (including two small Green Belt releases). Taken together, these could provide 14,682 14,252 new homes for Cambridge over the local plan period (See Table 2.3 - Housing provision to 2031)."

Furthermore, Table 2.3 should be amended to reflect these corrected numbers.

Legally Compliant?: Yes

Full Reference: O - 65623 - 25299 - PM/CC/2/H - iv

## 65692 Object

**Respondent: Mr Jeremy Jones [25348]**

**Agent: N/A**

Summary: I would like to request the amendment to paragraph 2.43 to reflect the removal of the Green Belt sites, as no justification of exceptional circumstances remains, given the updated 'housing land supply position based on the latest monitoring information, changes in the anticipated delivery rates on major sites and modifications proposed elsewhere in the schedule.'

The inclusion of the Green Belt sites GB1 and GB2 without exceptional circumstances to justify their release from the Green Belt is not consistent with national policy as expressed in both the NPPF and the PPG.

Change To Plan: The amendment should therefore change the paragraph to read:

"As of April 2015, there is planning permission for 7,036 new homes within the urban area and in the agreed urban extensions. There are a further 1,010 planned dwellings on existing allocated sites that do not have planning permission. Completions between 2011/12 and 2014/15 account for 2,860 dwellings. In addition, the Council's strategic housing land availability assessment (SHLAA), together with findings of the Councils' annual housing trajectory which assesses the capacity for future housing within the existing urban area, indicates capacity for a further 3,347 dwellings in the urban area of Cambridge. Taken together, these could provide 14,252 new homes for Cambridge over the local plan period (See Table 2.3 - Housing provision to 2031)."

Legally Compliant?: Not Specified

Full Reference: O - 65692 - 25348 - PM/CC/2/H - iv

## 65759 Object

**Respondent: Mr Leonard Rix [25445]**

**Agent: N/A**

Summary: In line with my previous objection to modification PM/SC/2/G, I would like to request the amendment to paragraph 2.43 to reflect removal of the Green Belt sites, as no justification of exceptional circumstances remains, given the updated 'housing land supply position based on the latest monitoring information, changes in anticipated delivery rates on major sites and modifications proposed elsewhere in the schedule.'

As mentioned in the previous objection, the inclusion of the Green Belt sites GB1 and GB2 without 'exceptional circumstances' to justify their release from the Green Belt is not consistent with national policy as expressed in the National Planning Policy Framework and Planning Practice Guidelines.

Change To Plan: The amendment should therefore change the paragraph to read:

"As of April 2015, there is planning permission for 7,036 new homes within the urban area and in the agreed urban extensions. There are a further 1,010 planned dwellings on existing allocated sites that do not have planning permission. Completions between 2011/12 and 2014/15 account for 2,860 dwellings. In addition, the Council's strategic housing land availability assessment (SHLAA), together with findings of the Councils' annual housing trajectory which assesses the capacity for future housing within the existing urban area, indicates capacity for a further 3,777 3,347 dwellings in the urban area of Cambridge (including two small Green Belt releases). Taken together, these could provide 14,682 14,252 new homes for Cambridge over the local plan period (See Table 2.3 - Housing provision to 2031)."

Furthermore, Table 2.3 should be amended to reflect these corrected numbers.

Legally Compliant?: Not Specified

Full Reference: O - 65759 - 25445 - PM/CC/2/H - iv

**65925 Object**                      **Respondent: Cambridge Past Present and Future (Ms Stacey Weiser) [20942]**                      **Agent: N/A**

Summary: The release of GB1 and GB2 from the Green Belt should be an option of last resort.

Cambridge City's objectively assessed needs are capable of being met within the urban area. CambridgePPF has already made representations that there are opportunities within the city for regeneration. A Register of Brownfield Sites should be drawn up. Such sites should be developed before any further release of Green Belt for housing. Release of further Green Belt sites should be an option of last resort and placed lowest in the development sequence.

Change To Plan: Delete the proposed wording "(including two small Green Belt releases)" from para 2.43.

Should the Inspectors confirm release of GB1 and GB2, CambridgePPF ask that the parameters described in the LDA Green Belt Study (para 6.14.6) be applied so as to minimise significant long-term harm to the Green Belt.

Legally Compliant?: Not Specified

Full Reference: O - 65925 - 20942 - PM/CC/2/H - ii

**66110 Object**                      **Respondent: Grosvenor Developments Ltd and USS [25482]**                      **Agent: Savills (Mr Colin Campbell) [15804]**

Summary: The Cambridge Inner Green Belt Boundary Study, LDA Design, November, 2015, is not an appropriate evidence base and does not overcome issues identified at the EiP.

As part of reviewing this report, a number of concerns relating to the methodology have been determined that skew the results for sector 7. The assessment of Sector 7 is not appropriate.

Change To Plan: Delete modification

Legally Compliant?: Not Specified

Full Reference: O - 66110 - 25482 - PM/CC/2/H - i, ii, iii

**65194 Support**                      **Respondent: Residents' Association of Old Newnham (Gillian Moore) [25297]**                      **Agent: N/A**

Summary: The 94 RAON members were emailed on 18.12.15 with a summary of the proposed amendments to the Local Plan. The RAON committee proposed that the RAON support all the amendments. Members had until 15.1.16 to disagree with this proposal, but not one member disagreed.

Some members advocate the expansion of the market towns around Cambridge - Newmarket, Haverhill, etc. - to reduce the pressure on Cambridge to expand. This would require investment in public transport.

Change To Plan:

Legally Compliant?: Not Specified

Full Reference: S - 65194 - 25297 - PM/CC/2/H - None

65466 Object

Respondent: Bidwells (Miss Marcia Whitehead) [17324]

Agent: Bidwells LLP (Alison Barnes) [25318]

Summary: Bidwells object to the Proposed Modifications to Table 2.3 since, despite the proposed changes to the proportion of housing across the development hierarchy, the strategy remains too heavily reliant on development at New Settlements where significant uncertainty exists with regard to deliverability.

The sustainability merits of sites on the edge of Green Belt have not been given sufficient consideration in sustainability terms due to the Councils' approach to the assessment of the Green Belt.

Consequently, Table 2.3 is unsound as it is not:

- \* positively prepared;
- \* justified as it is not based on a robust evidence base;
- \* consistent with National Policy.

Change To Plan: The Proposed Modifications to Table 2.3 should be deleted and replaced with the balance of housing across the hierarchy reviewed with more cautious delivery assumptions used for the New Settlements and having regard to a more fundamental Green Belt Review. Any resultant shortfalls in housing supply should then be addressed through further allocations on the Edge of Cambridge and Villages.

It is considered that this revised approach would enable the Council to meet the objectively assessed housing needs for Cambridge in full and boost significantly the supply of housing in accordance with the requirements of Government guidance in the NPPF paragraphs 47 and 159. As such, this will ensure that the Plan is Sound.

Legally Compliant?: No

Full Reference: O - 65466 - 17324 - PM/CC/2/I - i, ii, iv

65510 Object

Respondent: Endurance Estates Limited [19174]

Agent: Bidwells LLP (Susan Chappell) [25316]

Summary: Endurance Estates object to the Proposed Modifications to Table 2.3 since, despite the proposed changes to the proportion of housing across the development hierarchy, the strategy remains too heavily reliant on development at New Settlements where significant uncertainty exists with regard to deliverability.

The sustainability merits of sites on the edge of Green Belt have not been given sufficient consideration in sustainability terms due to the Councils' approach to the assessment of the Green Belt.

Consequently, Table 2.3 is unsound as it is not:

- \* positively prepared;
- \* justified as it is not based on a robust evidence base;
- \* consistent with National Policy.

Change To Plan: The Proposed Modifications to Table 2.3 should be deleted and replaced with the balance of housing across the hierarchy reviewed with more cautious delivery assumptions used for the New Settlements and having regard to a more fundamental Green Belt Review. Any resultant shortfalls in housing supply should be addressed through further allocations on the Edge of Cambridge and Villages.

This revised approach would enable the Council to meet the objectively assessed housing needs for Cambridge in full and boost significantly the supply of housing in accordance with the NPPF. As such, this will ensure that the Plan is Sound.

Legally Compliant?: No

Full Reference: O - 65510 - 19174 - PM/CC/2/I - i, ii, iv

65520 Object

**Respondent: Emmanuel & Gonville & Caius [25384]**

**Agent: Bidwells LLP (Alison Barnes) [25318]**

Summary: Emmanuel and Gonville & Caius object to the Proposed Modifications to Table 2.3 since, despite proposed changes to the proportion of housing across the development hierarchy, the strategy remains too heavily reliant on development at New Settlements where significant uncertainty exists with regard to deliverability.

The sustainability merits of sites on the edge of Green Belt have not been given sufficient consideration in sustainability terms due to the Councils' approach to the assessment of the Green Belt.

Table 2.3 is unsound as it isn't:

- \* positively prepared;
- \* justified as it is not based on a robust evidence base;
- \* consistent with National Policy.

Change To Plan: The Proposed Modifications to Table 2.3 should be deleted and replaced with the balance of housing across the hierarchy reviewed with more cautious delivery assumptions used for the New Settlements and having regard to a more fundamental Green Belt Review. Any resultant shortfalls in housing supply should then be addressed through further allocations on the Edge of Cambridge and Villages.

It is considered that this revised approach would enable the Council to meet the objectively assessed housing needs for Cambridge in full and boost significantly the supply of housing in accordance with the requirements of Government guidance in the NPPF paragraphs 47 and 159. As such, this will ensure that the Plan is Sound.

Legally Compliant?: No

Full Reference: O - 65520 - 25384 - PM/CC/2/I - i, ii, iv

65551 Object

**Respondent: Unwins and Biggs [25382]**

**Agent: Bidwells LLP (Alison Barnes) [25318]**

Summary: Unwins and Biggs object to the Proposed Modifications to Table 2.3 since, despite the proposed changes to the proportion of housing across the development hierarchy, the strategy remains too heavily reliant on development at New Settlements where significant uncertainty exists with regard to deliverability.

The sustainability merits of sites on the edge of Green Belt have not been given sufficient consideration in sustainability terms due to the Councils' approach to the assessment of the Green Belt.

Consequently, Table 2.3 is unsound as it isn't:

- \* positively prepared;
- \* justified as it is not based on a robust evidence base;
- \* consistent with National Policy.

Change To Plan: The Proposed Modifications to Table 2.3 should be deleted and replaced with the balance of housing across the hierarchy reviewed with more cautious delivery assumptions used for the New Settlements and having regard to a more fundamental Green Belt Review. Any resultant shortfalls in housing supply should then be addressed through further allocations on the Edge of Cambridge and Villages.

It is considered that this revised approach would enable the Council to meet the objectively assessed housing needs for Cambridge in full and boost significantly the supply of housing in accordance with the requirements of Government guidance in the NPPF paragraphs 47 and 159. As such, this will ensure that the Plan is Sound.

Legally Compliant?: No

Full Reference: O - 65551 - 25382 - PM/CC/2/I - i, ii, iv

## 65554 Object

**Respondent: Pigeon Land & LIH [25320]**

**Agent: CODE Development Planners Ltd (Ms Karen Beech) [25295]**

Summary: We do not consider that Cambridge City and South Cambridgeshire should have a joint housing trajectory.

South Cambridgeshire and Cambridge City have separate local plans and should therefore in our view have separate housing trajectories.

This was confirmed by the inspector who considered two planning appeals at Waterbeach and said in the decision letter, dated 25 June 2014, that a joint housing trajectory would not be the correct approach.

Relevant documents:160125\_CSTpt.pdf

Executive summary

Section 1 - Introduction - para 1.1 to 1.6

Section 2 - OAHN & Housing Delivery - section 2.2 - para 2.2.1 to 2.2.5

Section 4 - Overall Development Strategy - para 4.1 to 4.5

Section 7 - Conclusions - para 7.1 to 7.6

Change To Plan: Given that Cambridge City and South Cambridgeshire are preparing separate Local Plans, each should have their own housing trajectory.

Legally Compliant?: Yes

Full Reference: O - 65554 - 25320 - PM/CC/2/I - i, ii, iii

## 65565 Object

**Respondent: Pembroke College & the Balaam Family [21173]**

**Agent: Bidwells LLP (Susan Chappell) [25316]**

Summary: Pembroke College & the Balaam Family object to Proposed Modifications to Table 2.3 since, despite the proposed changes to the proportion of housing across the development hierarchy, the strategy remains too heavily reliant on development at New Settlements where significant uncertainty exists with regard to deliverability.

The sustainability merits of sites on edge of Green Belt havenot been given sufficient consideration in sustainability terms due to the Councils' approach to the assessment of the Green Belt.

Table 2.3 is unsound as it is not:

\* positively prepared;

\* justified as it is not based on a robust evidence base;

\* consistent with National Policy.

Change To Plan: The Proposed Modifications to Table 2.3 should be deleted and replaced with the balance of housing across the hierarchy reviewed with more cautious delivery assumptions used for the New Settlements and having regard to a more fundamental Green Belt Review. Any resultant shortfalls in housing supply should then be addressed through further allocations on the Edge of Cambridge and Villages.

It is considered that this revised approach would enable the Council to meet the objectively assessed housing needs for Cambridge in full and boost significantly the supply of housing in accordance with the requirements of Government guidance in the NPPF paragraphs 47 and 159. As such, this will ensure that the Plan is Sound.

Legally Compliant?: No

Full Reference: O - 65565 - 21173 - PM/CC/2/I - i, ii, iv

## 65695 Object

**Respondent: Mr Jeremy Jones [25348]**

**Agent: N/A**

Summary: Table 2.3 should be amended to reflect the corrected numbers in paragraph 2.43 in line with my objection to modification PM/CC/2/H.

Change To Plan: Table 2.3 should be amended to reflect the corrected numbers in amended paragraph 2.43 as follows:  
"As of April 2015, there is planning permission for 7,036 new homes within the urban area and in the agreed urban extensions. There are a further 1,010 planned dwellings on existing allocated sites that do not have planning permission. Completions between 2011/12 and 2014/15 account for 2,860 dwellings. In addition, the Council's strategic housing land availability assessment (SHLAA), together with findings of the Councils' annual housing trajectory which assesses the capacity for future housing within the existing urban area, indicates capacity for a further 3,347 dwellings in the urban area of Cambridge. Taken together, these could provide 14,252 new homes for Cambridge over the local plan period (See Table 2.3 - Housing provision to 2031)."

Legally Compliant?: Not Specified

Full Reference: O - 65695 - 25348 - PM/CC/2/I - iv

**65926 Object**                      **Respondent: Cambridge Past Present and Future (Ms Stacey Weiser) [20942]**                      **Agent: N/A**

Summary: CambridgePPF request table 2.3 be amended to delete the potential housing yield from the GB1 and GB2 allocations. The sustainability appraisal addendum report shows that urban extensions in the Green Belt are less sustainable than new developments, so GB1 and GB2 should be removed.

Change To Plan: Amend modification

Legally Compliant?: Not Specified

Full Reference: O - 65926 - 20942 - PM/CC/2/I - ii

**65999 Object**                      **Respondent: Commercial Estates Group [17653]**                      **Agent: Nathaniel Lichfield & Partners (Mr Matthew Spry) [20555]**

Summary: CEG maintains that the Objectively Assessed Housing Need (OAHN) for the HMA is greater than the Councils propose, and in particular the need in Cambridge City is greater than the 14,000 homes provided by the draft Cambridge Local Plan.

This representation is supported by a range of technical papers which form part of and support this representation, including a Technical Paper on OAHN (CEG Representation Appendix 2). This Paper provides a critique of the latest PBA assessment and sets out the reasons why the OAHN must be increased to 41,000 new homes if the jobs target of 44,000 is to be met.

Relevant Attachment  
Cambridge South East 1.4 Section 2(a)-OAHN (2.2-2.13) and Appendix 2 (OAHN)

Change To Plan: Amend modification

Legally Compliant?: Not Specified

Full Reference: O - 65999 - 17653 - PM/CC/2/I - i, ii, iii, iv

**65195 Support**                      **Respondent: Residents' Association of Old Newnham (Gillian Moore) [25297]**                      **Agent: N/A**

Summary: The 94 RAON members were emailed on 18.12.15 with a summary of the proposed amendments to the Local Plan. The RAON committee proposed that the RAON support all the amendments. Members had until 15.1.16 to disagree with this proposal, but not one member disagreed.

Some members advocate the expansion of the market towns around Cambridge - Newmarket, Haverhill, etc. - to reduce the pressure on Cambridge to expand. This would require investment in public transport.

Change To Plan:

Legally Compliant?: Not Specified

Full Reference: S - 65195 - 25297 - PM/CC/2/I - None



65467 Object

Respondent: Bidwells (Miss Marcia Whitehead) [17324]

Agent: Bidwells LLP (Alison Barnes) [25318]

Summary: Bidwells object to the Proposed Modification to Paragraph 2.45 proposing a joint housing trajectory for Cambridge and South Cambridgeshire for the purposes of phasing of housing delivery including for calculating the 5-year housing land supply.

However, this approach does not comply with the NPPF which requires that, to boost significantly the supply of housing, local planning authorities should identify and update annually a supply of specific deliverable sites sufficient to provide five years' worth of housing against their housing requirements.

Consequently, the Proposed Modification is unsound in that it is not:

- \* positively prepared;
- \* consistent with National Policy.

Change To Plan: Paragraph 2.45 should be deleted and any shortfall in the Council's housing land supply should be addressed through further allocations within the Plan.

It is considered that this revised approach would enable the Council to meet the objectively assessed housing needs for Cambridge in full and boost significantly the supply of housing in accordance with the requirements of Government guidance in the NPPF paragraphs 47 and 159. As such, this will ensure that the Plan is Sound.

Legally Compliant?: No

Full Reference: O - 65467 - 17324 - PM/CC/2/J - i, iv

65511 Object

Respondent: Endurance Estates Limited [19174]

Agent: Bidwells LLP (Susan Chappell) [25316]

Summary: Endurance Estates object to the Proposed Modification to Paragraph 2.45 proposing a joint housing trajectory for Cambridge and South Cambridgeshire for the purposes of phasing of housing delivery including for calculating the 5-year housing land supply.

However, this approach does not comply with the NPPF which requires that, to boost significantly the supply of housing, local planning authorities should identify and update annually a supply of specific deliverable sites sufficient to provide five years' worth of housing against their housing requirements.

Consequently, the Proposed Modification is unsound in that it is not:

- \* positively prepared;
- \* consistent with National Policy.

Change To Plan: Paragraph 2.45 should be deleted and any shortfall in the Council's housing land supply should be addressed through further allocations within the Plan.

It is considered that this revised approach would enable the Council to meet the objectively assessed housing needs for Cambridge in full and boost significantly the supply of housing in accordance with the requirements of Government guidance in the NPPF paragraphs 47 and 159. As such, this will ensure that the Plan is Sound.

Legally Compliant?: No

Full Reference: O - 65511 - 19174 - PM/CC/2/J - i, iv

65528 Object

**Respondent: Emmanuel & Gonville & Caius [25384]**

**Agent: Bidwells LLP (Alison Barnes) [25318]**

Summary: Emmanuel and Gonville & Caius object to the Proposed Modification to Paragraph 2.45 proposing a joint housing trajectory for Cambridge and South Cambridgeshire for the purposes of phasing of housing delivery including for calculating the 5-year housing land supply.

However, this approach does not comply with the NPPF which requires that, to boost significantly the supply of housing, local planning authorities should identify and update annually a supply of specific deliverable sites sufficient to provide five years' worth of housing against their housing requirements.

The Proposed Modification is unsound in that it is not:

- \* positively prepared;
- \* consistent with National Policy.

Change To Plan: Paragraph 2.45 should be deleted and any shortfall in the Council's housing land supply should be addressed through further allocations within the Plan.

It is considered that this revised approach would enable the Council to meet the objectively assessed housing needs for Cambridge in full and boost significantly the supply of housing in accordance with the requirements of Government guidance in the NPPF paragraphs 47 and 159. As such, this will ensure that the Plan is Sound.

Legally Compliant?: No

Full Reference: O - 65528 - 25384 - PM/CC/2/J - i, iv

65553 Object

**Respondent: Unwins and Biggs [25382]**

**Agent: Bidwells LLP (Alison Barnes) [25318]**

Summary: Unwins and Biggs object to the Proposed Modification to Paragraph 2.45 proposing a joint housing trajectory for Cambridge and South Cambridgeshire for the purposes of phasing of housing delivery including for calculating the 5-year housing land supply.

However, this approach does not comply with the NPPF which requires that, to boost significantly the supply of housing, local planning authorities should identify and update annually a supply of specific deliverable sites sufficient to provide five years' worth of housing against their housing requirements.

Consequently, the Proposed Modification is unsound in that it is not:

- \* positively prepared;
- \* consistent with National Policy.

Change To Plan: Paragraph 2.45 should be deleted and any shortfall in the Council's housing land supply should be addressed through further allocations within the Plan.

It is considered that this revised approach would enable the Council to meet the objectively assessed housing needs for Cambridge in full and boost significantly the supply of housing in accordance with the requirements of Government guidance in the NPPF paragraphs 47 and 159. As such, this will ensure that the Plan is Sound.

Legally Compliant?: No

Full Reference: O - 65553 - 25382 - PM/CC/2/J - i, iv

## 65557 Object

**Respondent: Pigeon Land & LIH [25320]**

**Agent: CODE Development Planners Ltd (Ms Karen Beech) [25295]**

Summary: We do not consider that Cambridge City and South Cambridgeshire should have a joint housing trajectory.

South Cambridgeshire and Cambridge City have separate local plans and should therefore in our view have separate housing trajectories.

This was confirmed by the inspector who considered two planning appeals at Waterbeach and said in the decision letter, dated 25 June 2014, that a joint housing trajectory would not be the correct approach.

Relevant documents:160125\_CSTpt.pdf

Executive summary

Section 1 - Introduction - para 1.1 to 1.6

Section 2 - OAHN & Housing Delivery - section 2.2 - para 2.2.1 to 2.2.5

Section 4 - Overall Development Strategy - para 4.1 to 4.5

Section 7 - Conclusions - para 7.1 to 7.6

Change To Plan: Given that Cambridge City and South Cambridgeshire are preparing separate Local Plans, each should have their own housing trajectory.

Legally Compliant?: Yes

Full Reference: O - 65557 - 25320 - PM/CC/2/J - i, ii, iii

## 65568 Object

**Respondent: Pembroke College & the Balaam Family [21173]**

**Agent: Bidwells LLP (Susan Chappell) [25316]**

Summary: Pembroke College & the Balaam Family object to the Proposed Modification to Paragraph 2.45 proposing a joint housing trajectory for Cambridge and South Cambridgeshire for the purposes of phasing of housing delivery including for calculating the 5-year housing land supply.

This approach does not comply with the NPPF which requires that, to boost significantly the supply of housing, local planning authorities should identify and update annually a supply of specific deliverable sites sufficient to provide five years' worth of housing against their housing requirements.

The Proposed Modification is unsound in that it is not:

\* positively prepared;

\* consistent with National Policy.

Change To Plan: Paragraph 2.45 should be deleted and any shortfall in the Council's housing land supply should be addressed through further allocations within the Plan.

It is considered that this revised approach would enable the Council to meet the objectively assessed housing needs for Cambridge in full and boost significantly the supply of housing in accordance with the requirements of Government guidance in the NPPF paragraphs 47 and 159. As such, this will ensure that the Plan is Sound.

Legally Compliant?: No

Full Reference: O - 65568 - 21173 - PM/CC/2/J - i, iv

## 65830 Object

**Respondent: Leonard Martin [18145]**

**Agent: N/A**

Summary: This submission considers relevant first principles and comparative assessment work that needs to be done in order to determine which broad spatial options would represent the most sustainable pattern of development. It considers further work earlier required by the Inspectorate, in particular transport modelling report.

More and better evidence is still required. The further work is inadequate.

Proposed pattern of development and other plan content cannot be judged to be sound.

Suggest the root cause is high level disconnect between local transport and land use planning despite being inextricably linked. This is last opportunity to remove this disconnect and adopt an evidence-led decision-making process.

Change To Plan:

Legally Compliant?: Not Specified

Full Reference: O - 65830 - 18145 - PM/CC/2/J - None

## 66000 Object

**Respondent: Commercial Estates Group [17653]**

**Agent: Nathaniel Lichfield & Partners (Mr Matthew Spry) [20555]**

Summary: Notwithstanding discussions in the Examination sessions to date, the modifications do not include a clear commitment to an early review of the Plans in 2019.

If the Plans are to progress based on a joint housing trajectory, this must only be on the basis of a clear commitment to an early review, which will include a further review of the Cambridge Green Belt given the concerns regarding the methodology and outcome of Green Belt reviews undertaken to date (see accompanying technical notes).

This representation is supported by a summary document and range of technical papers prepared by CEG which form part of and support this representation.

Relevant Attachment

Cambridge South East 1.4 3.19-3.23 and

All Appendices and 2 (OAHN) and 3 (Green Belt) in particular

Change To Plan: Amend modification

Legally Compliant?: Not Specified

Full Reference: O - 66000 - 17653 - PM/CC/2/J - i, ii, iii, iv

## 66132 Object

**Respondent: North Barton Road Land Owners Group [21302]**

**Agent: Carter Jonas LLP (Brian Flynn) [17331]**

Summary: The joint housing trajectory:

-Is a negative response to the housing land supply shortfall in South Cambridgeshire. It is not clear, for example, what action Cambridgeshire City Council could take if there is a housing shortfall against the joint housing trajectory caused by the failure to deliver development at the proposed new settlements in South Cambridgeshire;

-Has not been assessed against sustainability objectives, particularly in terms of the potential negative impacts on affordable housing if there are delays to delivery at the new settlements. No alternatives to a joint housing trajectory have been considered or consulted on by the Councils.

Relevant attachments:

-Jan Representations OAN (25.01.16).pdf

-North BRLOG LP Mods Jan 2016.pdf : Paragraphs 22 to 23.pdf

Change To Plan: We request that all references to a joint housing trajectory are deleted from Draft CLP2014.

Legally Compliant?: Not Specified

Full Reference: O - 66132 - 21302 - PM/CC/2/J - i, ii, iv

## 65196 Support

**Respondent: Residents' Association of Old Newnham (Gillian Moore) [25297]**

**Agent: N/A**

Summary: The 94 RAON members were emailed on 18.12.15 with a summary of the proposed amendments to the Local Plan. The RAON committee proposed that the RAON support all the amendments. Members had until 15.1.16 to disagree with this proposal, but not one member disagreed.

Some members advocate the expansion of the market towns around Cambridge - Newmarket, Haverhill, etc. - to reduce the pressure on Cambridge to expand. This would require investment in public transport.

Change To Plan:

Legally Compliant?: Not Specified

Full Reference: S - 65196 - 25297 - PM/CC/2/J - None

## 65294 Support

**Respondent: Campaign to Protect Rural England (CPRE) (Miss Shirley Fieldhouse) [17302]**

**Agent: N/A**

Summary: CPRE strongly supports the Councils' agreement that the housing trajectories for both areas be considered together for the purposes of housing delivery, as it is entirely consistent with the sequential approach outlined in the strategy.

Change To Plan:

Legally Compliant?: Not Specified

Full Reference: S - 65294 - 17302 - PM/CC/2/J - None

65775 Support

Respondent: Uttlesford District Council (Richard Fox) [25450]

Agent: N/A

Summary: Uttlesford District Council have no officer comments to make on the Modifications. This is subject to ratification at the Council's Planning Policy Working Group on 27/01/16.

Change To Plan:

Legally Compliant?: Not Specified

Full Reference: S - 65775 - 25450 - PM/CC/2/J - None

CHAPTER: Appendix A: Proposed main PM/CC/2/K  
modifications to the Cambridge

65197 Support

Respondent: Residents' Association of Old Newnham (Gillian Moore) [25297]

Agent: N/A

Summary: The 94 RAON members were emailed on 18.12.15 with a summary of the proposed amendments to the Local Plan. The RAON committee proposed that the RAON support all the amendments. Members had until 15.1.16 to disagree with this proposal, but not one member disagreed.

Some members advocate the expansion of the market towns around Cambridge - Newmarket, Haverhill, etc. - to reduce the pressure on Cambridge to expand. This would require investment in public transport.

Change To Plan:

Legally Compliant?: Not Specified

Full Reference: S - 65197 - 25297 - PM/CC/2/K - None

CHAPTER: Appendix A: Proposed main PM/CC/2/L  
modifications to the Cambridge

65927 Object

Respondent: Cambridge Past Present and Future (Ms Stacey Weiser) [20942]

Agent: N/A

Summary: CambridgePPF request that an updated Forward Trajectory for the whole plan period should be included as it comprises a useful planning tool that provides a good overview of the timescale envisaged by the Council and is easily comprehensible to the lay reader. Updated trajectories are a useful means of monitoring changes in the Council's expectations based on actual performance so they should also be published in the Annual Monitoring Report.

Change To Plan: Amend modification

Legally Compliant?: Not Specified

Full Reference: O - 65927 - 20942 - PM/CC/2/L - ii

65198 Support

Respondent: Residents' Association of Old Newnham (Gillian Moore) [25297]

Agent: N/A

Summary: The 94 RAON members were emailed on 18.12.15 with a summary of the proposed amendments to the Local Plan. The RAON committee proposed that the RAON support all the amendments. Members had until 15.1.16 to disagree with this proposal, but not one member disagreed.

Some members advocate the expansion of the market towns around Cambridge - Newmarket, Haverhill, etc. - to reduce the pressure on Cambridge to expand. This would require investment in public transport.

Change To Plan:

Legally Compliant?: Not Specified

Full Reference: S - 65198 - 25297 - PM/CC/2/L - None

**65469 Object**      **Respondent: Bidwells (Miss Marcia Whitehead) [17324]**      **Agent: Bidwells LLP (Alison Barnes) [25318]**

Summary: Bidwells object to the Proposed Modification to Paragraph 2.48 proposing a joint housing trajectory for Cambridge and South Cambridgeshire for the purposes of phasing of housing delivery including for calculating the 5-year housing land supply.

However, this approach does not comply with the NPPF which requires that, to boost significantly the supply of housing, local planning authorities should identify and update annually a supply of specific deliverable sites sufficient to provide five years' worth of housing against their housing requirements.

Consequently, the Proposed Modification is unsound in that it is not:

- \* positively prepared;
- \* consistent with National Policy.

Change To Plan: Paragraph 2.48 should be deleted and any shortfalls in the Council's housing land supply should be addressed through further allocations within the Plans.

It is considered that this revised approach would enable the Council to meet the objectively assessed housing needs for Cambridge in full and boost significantly the supply of housing in accordance with the requirements of Government guidance in the NPPF paragraphs 47 and 159. As such, this will ensure that the Plan is Sound.

Legally Compliant?: No

Full Reference: O - 65469 - 17324 - PM/CC/2/M - i, iv

**65515 Object**      **Respondent: Endurance Estates Limited [19174]**      **Agent: Bidwells LLP (Susan Chappell) [25316]**

Summary: Endurance Estates object to the Proposed Modification to Paragraph 2.48 proposing a joint housing trajectory for Cambridge and South Cambridgeshire for the purposes of phasing of housing delivery including for calculating the 5-year housing land supply.

However, this approach does not comply with the NPPF which requires that, to boost significantly the supply of housing, local planning authorities should identify and update annually a supply of specific deliverable sites sufficient to provide five years' worth of housing against their housing requirements.

Consequently, the Proposed Modification is unsound in that it is not:

- \* positively prepared;
- \* consistent with National Policy.

Change To Plan: Paragraph 2.48 should be deleted and any shortfalls in the Council's housing land supply should be addressed through further allocations within the Plans.

It is considered that this revised approach would enable the Council to meet the objectively assessed housing needs for Cambridge in full and boost significantly the supply of housing in accordance with the requirements of Government guidance in the NPPF paragraphs 47 and 159. As such, this will ensure that the Plan is Sound.

Legally Compliant?: No

Full Reference: O - 65515 - 19174 - PM/CC/2/M - i, iv

65531 Object

**Respondent: Emmanuel & Gonville & Caius [25384]**

**Agent: Bidwells LLP (Alison Barnes) [25318]**

Summary: Emmanuel and Gonville & Caius object to the Proposed Modification to Paragraph 2.48 proposing a joint housing trajectory for Cambridge and South Cambridgeshire for the purposes of phasing of housing delivery including for calculating the 5-year housing land supply.

However, this approach does not comply with the NPPF which requires that, to boost significantly the supply of housing, local planning authorities should identify and update annually a supply of specific deliverable sites sufficient to provide five years' worth of housing against their housing requirements.

The Proposed Modification is unsound in that it is not:

- \* positively prepared;
- \* consistent with National Policy.

Change To Plan: Paragraph 2.48 should be deleted and any shortfalls in the Council's housing land supply should be addressed through further allocations within the Plans.

It is considered that this revised approach would enable the Council to meet the objectively assessed housing needs for Cambridge in full and boost significantly the supply of housing in accordance with the requirements of Government guidance in the NPPF paragraphs 47 and 159. As such, this will ensure that the Plan is Sound.

Legally Compliant?: No

Full Reference: O - 65531 - 25384 - PM/CC/2/M - i, iv

65558 Object

**Respondent: Unwins and Biggs [25382]**

**Agent: Bidwells LLP (Alison Barnes) [25318]**

Summary: Unwins and Biggs object to the Proposed Modification to Paragraph 2.48 proposing a joint housing trajectory for Cambridge and South Cambridgeshire for the purposes of phasing of housing delivery including for calculating the 5-year housing land supply.

However, this approach does not comply with the NPPF which requires that, to boost significantly the supply of housing, local planning authorities should identify and update annually a supply of specific deliverable sites sufficient to provide five years' worth of housing against their housing requirements.

Consequently, the Proposed Modification is unsound in that it is not:

- \* positively prepared;
- \* consistent with National Policy.

Change To Plan: Paragraph 2.48 should be deleted and any shortfalls in the Council's housing land supply should be addressed through further allocations within the Plans.

It is considered that this revised approach would enable the Council to meet the objectively assessed housing needs for Cambridge in full and boost significantly the supply of housing in accordance with the requirements of Government guidance in the NPPF paragraphs 47 and 159. As such, this will ensure that the Plan is Sound.

Legally Compliant?: No

Full Reference: O - 65558 - 25382 - PM/CC/2/M - i, iv

65572 Object

Respondent: **Pembroke College & the Balaam Family [21173]**

Agent: **Bidwells LLP (Susan Chappell) [25316]**

Summary: Pembroke College & the Balaam Family object to the Proposed Modification to Paragraph 2.48 proposing a joint housing trajectory for Cambridge and South Cambridgeshire for the purposes of phasing of housing delivery including for calculating the 5-year housing land supply.

However, this approach does not comply with the NPPF which requires that, to boost significantly the supply of housing, local planning authorities should identify and update annually a supply of specific deliverable sites sufficient to provide five years' worth of housing against their housing requirements.

Consequently, the Proposed Modification is unsound in that it is not:

- \* positively prepared;
- \* consistent with National Policy.

Change To Plan: Paragraph 2.48 should be deleted and any shortfalls in the Council's housing land supply should be addressed through further allocations within the Plans.

It is considered that this revised approach would enable the Council to meet the objectively assessed housing needs for Cambridge in full and boost significantly the supply of housing in accordance with the requirements of Government guidance in the NPPF paragraphs 47 and 159. As such, this will ensure that the Plan is Sound.

Legally Compliant?: No

Full Reference: O - 65572 - 21173 - PM/CC/2/M - i, iv

65199 Support

Respondent: **Residents' Association of Old Newnham (Gillian Moore) [25297]**

Agent: **N/A**

Summary: The 94 RAON members were emailed on 18.12.15 with a summary of the proposed amendments to the Local Plan. The RAON committee proposed that the RAON support all the amendments. Members had until 15.1.16 to disagree with this proposal, but not one member disagreed.

Some members advocate the expansion of the market towns around Cambridge - Newmarket, Haverhill, etc. - to reduce the pressure on Cambridge to expand. This would require investment in public transport.

Change To Plan:

Legally Compliant?: Not Specified

Full Reference: S - 65199 - 25297 - PM/CC/2/M - None



**65390 Object**      **Respondent:** Campaign to Protect Rural England (CPRE) (Miss Shirley Fieldhouse)      **Agent:** N/A  
[17302]

Summary: Ref. para.4 The land which is not to be allocated in this local plan period clearly still fulfils Green Belt purposes of preventing urban sprawl, coalescence and maintaining the setting of Cambridge. The Airport owners have made it clear that there is no reasonable chance of relocating its functions and that they wish to pursue the development of the existing businesses for the foreseeable future. In these circumstances we do not see the point in safeguarding the land for development and consider that it should be returned to the Green Belt.

Change To Plan: Removal of safeguarding. Green Belt boundary to be amended.

Legally Compliant?: Yes

Full Reference: O - 65390 - 17302 - PM/CC/3/A - ii

**65447 Object**      **Respondent:** Endurance Estates and Marshall Group Property [25444]      **Agent:** LDA Design (Mr Jon Alsop) [25196]

Summary: We have submitted our main representation under separate cover, via email, but a summary is attached here.

Joint Representation by Endurance Estates Ltd. and Marshall Group Properties Ltd.

Summary  
The landowners wish to raise a qualified OBJECTION in regard to parts 2 d) to f) of Policy 12 (parts 2 c) to e) of Policy SS/3). The formulation of the words could suggest that the proposed allocations are subject to some conditionality, which is not necessary, does not appear to be the intention and which would create confusion about the allocation.  
In addition, studies and assessments undertaken by the landowners indicate that there are no constraints arising from the airport which could affect the principle of the suitability of the land for residential development.  
We therefore suggest that parts d. to f. of Policy 12, and their equivalent parts c. to e. of Policy SS/3, should be deleted, in that the planning application process (as recognised in the amended supporting text) is the proper place to ensure acceptable mitigation.

Change To Plan: We have submitted our main representation, including proposed changes, under separate cover, via email.

Legally Compliant?: Yes

Full Reference: O - 65447 - 25444 - PM/CC/3/A - ii, iii

**65993 Object**      **Respondent:** Commercial Estates Group [17653]      **Agent:** Nathaniel Lichfield & Partners (Mr Matthew Spry) [20555]

Summary: CEG has reviewed the updated evidence base and remains concerned that there is insufficient evidence to support the spatial distribution of housing growth around Cambridge and South Cambridgeshire.

CEG would support Plans which maximise development on the edge of Cambridge in principle, but the latest transport and infrastructure studies do not support the chosen locations for housing development, including the additional allocation on Land North of Cherry Hinton.

This representation is supported by a range of technical papers which form part of and support this representation, including a Technical Papers on Transport and Infrastructure (CEG Representation Appendices 4 and 5). These Papers provide a critique of the latest assessments and sets out the reasons why the proposed transport strategy and infrastructure will not adequately support growth or deliver sustainable development.

Relevant attachment  
Cambridge South East 1.4 Section 2 and  
Appendix 4 (Transport) and 5 (Transport)

Change To Plan: Amend modification

Legally Compliant?: Not Specified

Full Reference: O - 65993 - 17653 - PM/CC/3/A - i, ii, iii, iv

## 65200 Support

**Respondent:** Residents' Association of Old Newnham (Gillian Moore) [25297]

**Agent:** N/A

**Summary:** The 94 RAON members were emailed on 18.12.15 with a summary of the proposed amendments to the Local Plan. The RAON committee proposed that the RAON support all the amendments. Members had until 15.1.16 to disagree with this proposal, but not one member disagreed.

Some members advocate the expansion of the market towns around Cambridge - Newmarket, Haverhill, etc. - to reduce the pressure on Cambridge to expand. This would require investment in public transport.

Change To Plan:

Legally Compliant?: Not Specified

Full Reference: S - 65200 - 25297 - PM/CC/3/A - None

## 65268 Support

**Respondent:** Rustat Road Neighbourhood Association (Mr Roger Crabtree) [16745]

**Agent:** N/A

**Summary:** On balance, we support this proposed development providing the conditions set out in para 2 are fully met

Change To Plan:

Legally Compliant?: Not Specified

Full Reference: S - 65268 - 16745 - PM/CC/3/A - None

## 65414 Support

**Respondent:** David Blake [25352]

**Agent:** N/A

**Summary:** I fully support this modification. The bringing forward of safeguarded land makes excellent sense, especially as it removes any previously implied need for further Green Belt release in this Plan.

Change To Plan:

Legally Compliant?: Not Specified

Full Reference: S - 65414 - 25352 - PM/CC/3/A - None

## 65581 Support

**Respondent:** Anglian Water Services Limited (Sue Bull) [15648]

**Agent:** N/A

**Summary:** Please find attached RAG sheet summarising our views on serving the sites revised and included in the modifications.  
[Spreadsheet shows an overall RAG rating of Amber - Infrastructure and/or treatment upgrades required to serve proposed growth or diversion of assets may be required]

Change To Plan:

Legally Compliant?: Not Specified

Full Reference: S - 65581 - 15648 - PM/CC/3/A - None

## 65626 Support

**Respondent:** Dr Barry Rosen [25299]

**Agent:** N/A

**Summary:** I fully support this proposed modification. The bringing forward of safeguarded land makes excellent sense, especially as it removes any previously implied need for further Green Belt releas in this Plan.

Change To Plan:

Legally Compliant?: Not Specified

Full Reference: S - 65626 - 25299 - PM/CC/3/A - None

## 65686 Support

**Respondent:** Mr Jeremy Jones [25348]

**Agent:** N/A

**Summary:** I fully support this modification. The bringing forward of safeguarded land makes excellent sense, especially as it removes any previously implied need for further Green Belt release in this Plan.

Change To Plan:

Legally Compliant?: Not Specified

Full Reference: S - 65686 - 25348 - PM/CC/3/A - None

65752 Support

Respondent: Mr Leonard Rix [25445]

Agent: N/A

Summary: I fully support this modification. The bringing forward of safeguarded land makes an important contribution to removing any need for further Green Belt release in this Plan.

Change To Plan:

Legally Compliant?: Not Specified

Full Reference: S - 65752 - 25445 - PM/CC/3/A - None

65753 Support

Respondent: Endurance Estates and Marshall Group Property [25444]

Agent: LDA Design (Mr Jon Alsop) [25196]

Summary: Overall support for the proposed modifications set out in PM/CC/3/A and PM/SC/3/A.

Strongly support principle expressed in Part 2 e) of Policy 12 and Part 2 d) of Policy SS/3 concerning the preparation of a masterplan framework to provide cohesive overarching tool to inform subsequent applications.

Support Part 3 to provide a primary and secondary school, local centre, open space and spine road. Appendices 1 - 3 illustrate the overall context and sustainability of sites R47 and SS/3 1b).

Support Part 4 safeguarding land for the longer term.

Note and agree Part 5.

Support related amendments at Figure 7 and Inset C.

Change To Plan:

Legally Compliant?: Not Specified

Full Reference: S - 65753 - 25444 - PM/CC/3/A - None

65784 Support

Respondent: Historic England (Mr David Grech) [23622]

Agent: N/A

Summary: In respect of Housing Land Supply, Historic England has reviewed the revised housing allocation map (Figure 3.2) prepared by the Councils and again we do not wish to comment in detail on either the New Proposal site in the City or the New Proposal Site in SCDC.

We therefore do not object to the main modifications proposed to the Cambridge Local Plan in respect of the Development Strategy as set out in paragraphs 2.40 and 2.41 of the Report.

Change To Plan:

Legally Compliant?: Not Specified

Full Reference: S - 65784 - 23622 - PM/CC/3/A - None

65900 Support

Respondent: Cambridgeshire County Council (Juliet Richardson) [23747]

Agent: N/A

Summary: Welcome proposed modifications and recognition of existing and growing demand for education provision in Cambridge. Impact of further housing development, especially east of City, forecast to lead to shortfall in education capacity during plan period.

Inclusion of specific requirements within policies for Cambridge East (R47 and SS/31b) for secondary and primary education is positive step. Requirement to ensure preparation of joint masterplan for these sites prior to development is supported. Will ensure County Council is able to effectively address its statutory requirements to secure education provision for residents of new developments and existing community.

School likely to be in advance of wider development of Cambridge East. Supportive of approach to amend expectation for schools to be part of local centre.

Taking site of sufficient size to deliver a secondary school has potential to adversely impact wider viability and other policy requirements, e.g. affordable housing. Endorse securing school playing fields outside developable areas, including within Green Belt.

Change To Plan:

Legally Compliant?: Not Specified

Full Reference: S - 65900 - 23747 - PM/CC/3/A - None

**65928 Support**                      **Respondent: Cambridge Past Present and Future (Ms Stacey Weiser) [20942]**                      **Agent: N/A**

Summary: CambridgePPF support the inclusion of the additional land North of Cherry Hinton as an extension to site R47. This was one of the sites we proposed as alternatives within the city to the release of GB1 and GB2. This argument is still relevant.

Change To Plan:

Legally Compliant?: Not Specified

Full Reference: S - 65928 - 20942 - PM/CC/3/A - None

**65963 Support**                      **Respondent: Natural England (Ms Gail Hopkins) [25046]**                      **Agent: N/A**

Summary: We welcome modifications to this policy to require that development of land north of Newmarket Road, land north of Coldham's Lane and land north of Cherry Hinton will require acceptable mitigation of environmental impacts to be demonstrated.

Change To Plan:

Legally Compliant?: Not Specified

Full Reference: S - 65963 - 25046 - PM/CC/3/A - None

**CHAPTER: Appendix A: Proposed main PM/CC/3/B  
modifications to the Cambridge**

**65201 Support**                      **Respondent: Residents' Association of Old Newnham (Gillian Moore) [25297]**                      **Agent: N/A**

Summary: The 94 RAON members were emailed on 18.12.15 with a summary of the proposed amendments to the Local Plan. The RAON committee proposed that the RAON support all the amendments. Members had until 15.1.16 to disagree with this proposal, but not one member disagreed.

Some members advocate the expansion of the market towns around Cambridge - Newmarket, Haverhill, etc. - to reduce the pressure on Cambridge to expand. This would require investment in public transport.

Change To Plan:

Legally Compliant?: Not Specified

Full Reference: S - 65201 - 25297 - PM/CC/3/B - None

**65269 Support**                      **Respondent: Rustat Road Neighbourhood Association (Mr Roger Crabtree) [16745]**                      **Agent: N/A**

Summary: We support this distinction between what is and what is not green belt

Change To Plan:

Legally Compliant?: Not Specified

Full Reference: S - 65269 - 16745 - PM/CC/3/B - None

**Agent:** N/A

Change To Plan: Removal of safeguarding. Green Belt boundary to be amended.

Legally Compliant?: Yes

Full Reference: O - 65391 - 17302 - PM/CC/3/C - ii

**Respondent: Commercial Estates Group [17653]**

**Agent:** Nathaniel Lichfield & Partners (Mr Matthew Spry) [20555]

Summary: Reviewed updated evidence base and remain concerned there is insufficient evidence to support spatial distribution of housing growth around Cambridge and South Cambridgeshire.

Latest transport and infrastructure studies do not support chosen locations for housing, including Land North of Cherry Hinton. Support Plans which maximise development on edge of Cambridge in principle, but insufficient transport and infrastructure evidence to justify increased allocation in this location during plan period.

Representation supported by range of technical papers which form part of and support this representation, including Technical Papers on Transport and Infrastructure (Appendices 4 and 5). Papers provide a critique of latest assessments and sets out reasons why proposed transport strategy and infrastructure will not adequately support growth or deliver sustainable development.

Relevant Attachment  
Cambridge South East 1.4 Section 2 and  
Appendix 4 (Transport) and 5 (Infrastructure)

Change To Plan: Amend modification

Legally Compliant?: Not Specified

Full Reference: O - 66001 - 17653 - PM/CC/3/C - i, ii, iii, iv

**Respondent:** Residents' Association of Old Newnham (Gillian Moore) [25297]

**Agent:** N/A

Summary: The 94 RAON members were emailed on 18.12.15 with a summary of the proposed amendments to the Local Plan. The RAON committee proposed that the RAON support all the amendments. Members had until 15.1.16 to disagree with this proposal, but not one member disagreed.

Some members advocate the expansion of the market towns around Cambridge - Newmarket, Haverhill, etc. - to reduce the pressure on Cambridge to expand. This would require investment in public transport.

Change To Plan:

Legally Compliant?: Not Specified

Full Reference: S - 65202 - 25297 - PM/CC/3/C - None

**Respondent:** Rustat Road Neighbourhood Association (Mr Roger Crabtree) [16745]

**Agent:** N/A

Summary: Yes, a full master plan is essential to overview these possible developmeents

Change To Plan:

Legally Compliant?: Not Specified

Full Reference: S - 65270 - 16745 - PM/CC/3/C - None

**65203 Support**      **Respondent: Residents' Association of Old Newnham (Gillian Moore) [25297]**      **Agent: N/A**

Summary: The 94 RAON members were emailed on 18.12.15 with a summary of the proposed amendments to the Local Plan. The RAON committee proposed that the RAON support all the amendments. Members had until 15.1.16 to disagree with this proposal, but not one member disagreed.

Some members advocate the expansion of the market towns around Cambridge - Newmarket, Haverhill, etc. - to reduce the pressure on Cambridge to expand. This would require investment in public transport.

Change To Plan:

Legally Compliant?: Not Specified

Full Reference: S - 65203 - 25297 - PM/CC/3/D - None

**65271 Support**      **Respondent: Rustat Road Neighbourhood Association (Mr Roger Crabtree) [16745]**      **Agent: N/A**

Summary: We agree

Change To Plan:

Legally Compliant?: Not Specified

Full Reference: S - 65271 - 16745 - PM/CC/3/D - None

**65901 Support**      **Respondent: Cambridgeshire County Council (Juliet Richardson) [23747]**      **Agent: N/A**

Summary: Welcome proposed modifications and recognition of existing and growing demand for education provision in Cambridge. Impact of further housing development, especially east of City, forecast to lead to shortfall in education capacity during plan period.

Inclusion of specific requirements within policies for Cambridge East (R47 and SS/31b) for secondary and primary education is positive step. Requirement to ensure preparation of joint masterplan for these sites prior to development is supported. Will ensure County Council is able to effectively address its statutory requirements to secure education provision for residents of new developments and existing community.

School likely to be in advance of wider development of Cambridge East. Supportive of approach to amend expectation for schools to be part of local centre.

Taking site of sufficient size to deliver a secondary school has potential to adversely impact wider viability and other policy requirements, e.g. affordable housing. Endorse securing school playing fields outside developable areas, including within Green Belt.

Change To Plan:

Legally Compliant?: Not Specified

Full Reference: S - 65901 - 23747 - PM/CC/3/D - None

**65204 Support**      **Respondent: Residents' Association of Old Newnham (Gillian Moore) [25297]**      **Agent: N/A**

Summary: The 94 RAON members were emailed on 18.12.15 with a summary of the proposed amendments to the Local Plan. The RAON committee proposed that the RAON support all the amendments. Members had until 15.1.16 to disagree with this proposal, but not one member disagreed.

Some members advocate the expansion of the market towns around Cambridge - Newmarket, Haverhill, etc. - to reduce the pressure on Cambridge to expand. This would require investment in public transport.

Change To Plan:

Legally Compliant?: Not Specified

Full Reference: S - 65204 - 25297 - PM/CC/3/E - None

**65781 Support**      **Respondent: Historic England (Mr David Grech) [23622]**      **Agent: N/A**

Summary: In respect of Housing Land Supply, Historic England has reviewed the revised housing allocation map (Figure 3.2) prepared by the Councils and again we do not wish to comment in detail on either the New Proposal site in the City or the New Proposal Site in SCDC.

Change To Plan:

Legally Compliant?: Not Specified

Full Reference: S - 65781 - 23622 - PM/CC/3/E - None

**65902 Support**      **Respondent: Cambridgeshire County Council (Juliet Richardson) [23747]**      **Agent: N/A**

Summary: Welcome proposed modifications and recognition of existing and growing demand for education provision in Cambridge. Impact of further housing development, especially east of City, forecast to lead to shortfall in education capacity during plan period.

Inclusion of specific requirements within policies for Cambridge East (R47 and SS/31b) for secondary and primary education is positive step. Requirement to ensure preparation of joint masterplan for these sites prior to development is supported. Will ensure County Council is able to effectively address its statutory requirements to secure education provision for residents of new developments and existing community.

School likely to be in advance of wider development of Cambridge East. Supportive of approach to amend expectation for schools to be part of local centre.

Taking site of sufficient size to deliver a secondary school has potential to adversely impact wider viability and other policy requirements, e.g. affordable housing. Endorse securing school playing fields outside developable areas, including within Green Belt.

Change To Plan:

Legally Compliant?: Not Specified

Full Reference: S - 65902 - 23747 - PM/CC/3/E - None

**65146 Object**      **Respondent: Historic England (Mr David Grech) [23622]**      **Agent: N/A**

Summary: Historic England is concerned that the revised wording proposed to be added in to Policy 27 may lead the Council to support schemes to improve levels of environmental performance on listed buildings that would result in unacceptable levels of harm to the significance of those buildings. As currently drafted the policy is inconsistent with national policy.

Change To Plan: The policy wording needs to be revised and we suggest it should read:  
Where redevelopment/refurbishment of existing buildings is proposed, the development of bespoke assessment methodologies to assess the environmental impact of the proposal for submission with the planning applications will supported subject to agreement of the scope of the alternative methodology with the council. Proposals that lead to levels of environmental performance equivalent to, or higher than, BREEAM will be supported except where that requires unacceptable and/or unjustified levels of harm to the significance of a designated heritage asset.

Legally Compliant?: Yes

Full Reference: O - 65146 - 23622 - PM/CC/4/A - iv

**65238 Object**      **Respondent: Mrs Katie Lucas [25305]**      **Agent: N/A**

Summary: It has not been demonstrated that Cambridge will not have water supply problems. The word "severe" should be maintained in order to continue focus in this area.

Change To Plan: Remove the amendment.

Legally Compliant?: Yes

Full Reference: O - 65238 - 25305 - PM/CC/4/A - ii, iii

**65708 Object**      **Respondent: Dr Robert Evans [25285]**      **Agent: N/A**

Summary: The modifications do not address the availability of water.

Have the Inspectors accepted the original Sustainability Appraisal (paragraph 6.4.9), or have the Inspectors just ignored it? Whatever, the Draft Local Plan should address the problem of water availability.

Based on my own crude estimates there is a good chance Cambridge Water Company does not have enough water in the chalk aquifer to safely and sustainably maintain the proposed growth of Cambridge and its environs.

In Table 4.1 Areas to be covered in the Sustainability Statement, under the Aim/Objective of Water Management the word "severe" has been deleted. A downplaying of what could be a serious problem.

The Government is not helping the District Councils by lowering standards of building and so making watr efficiency less important than it was as it is one way of tackling the water availability problem.

Change To Plan:

Legally Compliant?: Not Specified

Full Reference: O - 65708 - 25285 - PM/CC/4/A - None

**65205 Support**      **Respondent: Residents' Association of Old Newnham (Gillian Moore) [25297]**      **Agent: N/A**

Summary: The 94 RAON members were emailed on 18.12.15 with a summary of the proposed amendments to the Local Plan. The RAON committee proposed that the RAON support all the amendments. Members had until 15.1.16 to disagree with this proposal, but not one member disagreed.

Some members advocate the expansion of the market towns around Cambridge - Newmarket, Haverhill, etc. - to reduce the pressure on Cambridge to expand. This would require investment in public transport.

Change To Plan:

Legally Compliant?: Not Specified

Full Reference: S - 65205 - 25297 - PM/CC/4/A - None



## 65595 Support

**Respondent:** Anglian Water Services Limited (Sue Bull) [15648]

**Agent:** N/A

Summary: 2.54 - Anglian Water support the Councils on water efficiency and will work with and advise the Council and developers to achieve the requirements of the proposed policy; that is 110litres/per head per day. Anglian Water are keen to promote water efficiency <http://www.anglianwater.co.uk/environment/why-we-care/water-efficiency-helps-the-environment.aspx>. Consideration should be given to the Water Resource Management Plan 2015 <http://www.anglianwater.co.uk/environment/our-commitment/our-plans/water-resource-management.aspx>. It should be noted the majority of water supply area in the plans fall outside Anglian Water areas of responsibility and the views of Cambridge Water should be sought.

Change To Plan:

Legally Compliant?: Not Specified

Full Reference: S - 65595 - 15648 - PM/CC/4/A - None

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modifications to the Cambridge

## 65206 Support

**Respondent:** Residents' Association of Old Newnham (Gillian Moore) [25297]

**Agent:** N/A

Summary: The 94 RAON members were emailed on 18.12.15 with a summary of the proposed amendments to the Local Plan. The RAON committee proposed that the RAON support all the amendments. Members had until 15.1.16 to disagree with this proposal, but not one member disagreed.

Some members advocate the expansion of the market towns around Cambridge - Newmarket, Haverhill, etc. - to reduce the pressure on Cambridge to expand. This would require investment in public transport.

Change To Plan:

Legally Compliant?: Not Specified

Full Reference: S - 65206 - 25297 - PM/CC/4/B - None

CHAPTER: Appendix A: Proposed main PM/CC/4/C  
modifications to the Cambridge

## 65207 Support

**Respondent:** Residents' Association of Old Newnham (Gillian Moore) [25297]

**Agent:** N/A

Summary: The 94 RAON members were emailed on 18.12.15 with a summary of the proposed amendments to the Local Plan. The RAON committee proposed that the RAON support all the amendments. Members had until 15.1.16 to disagree with this proposal, but not one member disagreed.

Some members advocate the expansion of the market towns around Cambridge - Newmarket, Haverhill, etc. - to reduce the pressure on Cambridge to expand. This would require investment in public transport.

Change To Plan:

Legally Compliant?: Not Specified

Full Reference: S - 65207 - 25297 - PM/CC/4/C - None

CHAPTER: Appendix A: Proposed main PM/CC/4/D  
modifications to the Cambridge

## 65209 Support

**Respondent:** Residents' Association of Old Newnham (Gillian Moore) [25297]

**Agent:** N/A

Summary: The 94 RAON members were emailed on 18.12.15 with a summary of the proposed amendments to the Local Plan. The RAON committee proposed that the RAON support all the amendments. Members had until 15.1.16 to disagree with this proposal, but not one member disagreed.

Some members advocate the expansion of the market towns around Cambridge - Newmarket, Haverhill, etc. - to reduce the pressure on Cambridge to expand. This would require investment in public transport.

Change To Plan:

Legally Compliant?: Not Specified

Full Reference: S - 65209 - 25297 - PM/CC/4/D - None

CHAPTER: Appendix A: Proposed main PM/CC/4/E  
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## 65892 Object

**Respondent:** Home Builders Federation (Mr James Stevens) [15801]

**Agent:** N/A

Summary: Paragraph 4.8 says Council will support the use of other energy efficiency standards. Contrary to national policy. Written Ministerial Statement of 25 March 2015 states clearly that other than Building Regulations and optional technical standards, local authorities should not set out in their Local Plans "any additional technical standards or requirements relating to the construction, internal layout or performance or new dwellings."

WMS states: "if, in the light of experience in implementing this policy statement, the government considers that it is not being accorded sufficient weight by planning authorities, we will consider bringing forward new legislation to secure implementation."

Council cannot encourage or lend support to adoption of other technical standards.

Change To Plan:

Legally Compliant?: Not Specified

Full Reference: O - 65892 - 15801 - PM/CC/4/E - iv

## 65210 Support

**Respondent:** Residents' Association of Old Newnham (Gillian Moore) [25297]

**Agent:** N/A

Summary: The 94 RAON members were emailed on 18.12.15 with a summary of the proposed amendments to the Local Plan. The RAON committee proposed that the RAON support all the amendments. Members had until 15.1.16 to disagree with this proposal, but not one member disagreed.

Some members advocate the expansion of the market towns around Cambridge - Newmarket, Haverhill, etc. - to reduce the pressure on Cambridge to expand. This would require investment in public transport.

Change To Plan:

Legally Compliant?: Not Specified

Full Reference: S - 65210 - 25297 - PM/CC/4/E - None

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modifications to the Cambridge

**65211 Support**      **Respondent: Residents' Association of Old Newnham (Gillian Moore) [25297]**      **Agent: N/A**

Summary: The 94 RAON members were emailed on 18.12.15 with a summary of the proposed amendments to the Local Plan. The RAON committee proposed that the RAON support all the amendments. Members had until 15.1.16 to disagree with this proposal, but not one member disagreed.

Some members advocate the expansion of the market towns around Cambridge - Newmarket, Haverhill, etc. - to reduce the pressure on Cambridge to expand. This would require investment in public transport.

Change To Plan:

Legally Compliant?: Not Specified

Full Reference: S - 65211 - 25297 - PM/CC/4/F - None

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modifications to the Cambridge

**65212 Support**      **Respondent: Residents' Association of Old Newnham (Gillian Moore) [25297]**      **Agent: N/A**

Summary: The 94 RAON members were emailed on 18.12.15 with a summary of the proposed amendments to the Local Plan. The RAON committee proposed that the RAON support all the amendments. Members had until 15.1.16 to disagree with this proposal, but not one member disagreed.

Some members advocate the expansion of the market towns around Cambridge - Newmarket, Haverhill, etc. - to reduce the pressure on Cambridge to expand. This would require investment in public transport.

Change To Plan:

Legally Compliant?: Not Specified

Full Reference: S - 65212 - 25297 - PM/CC/4/G - None

CHAPTER: Appendix A: Proposed main PM/CC/4/H  
modifications to the Cambridge

**65213 Support**      **Respondent: Residents' Association of Old Newnham (Gillian Moore) [25297]**      **Agent: N/A**

Summary: The 94 RAON members were emailed on 18.12.15 with a summary of the proposed amendments to the Local Plan. The RAON committee proposed that the RAON support all the amendments. Members had until 15.1.16 to disagree with this proposal, but not one member disagreed.

Some members advocate the expansion of the market towns around Cambridge - Newmarket, Haverhill, etc. - to reduce the pressure on Cambridge to expand. This would require investment in public transport.

Change To Plan:

Legally Compliant?: Not Specified

Full Reference: S - 65213 - 25297 - PM/CC/4/H - None

**65214 Support**      **Respondent: Residents' Association of Old Newnham (Gillian Moore) [25297]**      **Agent: N/A**

Summary: The 94 RAON members were emailed on 18.12.15 with a summary of the proposed amendments to the Local Plan. The RAON committee proposed that the RAON support all the amendments. Members had until 15.1.16 to disagree with this proposal, but not one member disagreed.

Some members advocate the expansion of the market towns around Cambridge - Newmarket, Haverhill, etc. - to reduce the pressure on Cambridge to expand. This would require investment in public transport.

Change To Plan:

Legally Compliant?: Not Specified

Full Reference: S - 65214 - 25297 - PM/CC/4/I - None

**65964 Support**      **Respondent: Natural England (Ms Gail Hopkins) [25046]**      **Agent: N/A**

Summary: Amendments to include requirements for proposals to demonstrate that any adverse impacts on the environment have been minimised as far as possible is supported.

Change To Plan:

Legally Compliant?: Not Specified

Full Reference: S - 65964 - 25046 - PM/CC/4/I - None

**65283 Object**

**Respondent: Bridget Smith [17462]**

**Agent: N/A**

Summary: There is absolutely no evidence for the statement being made. It ignores opportunities for wind generation on high rise buildings which is becoming increasingly common in many cities. There are also many open spaces in the City which would be suitable.

Statements such as 'wind energy is constrained' MUST be backed up with proper scientific evidence to be of any value.

Change To Plan: This statement should be removed. It is a nonsense and does not acknowledge that huge developments in renewable energy generation are being made all the time and that a City may well in very few years be an ideal site.

Legally Compliant?: Yes

Full Reference: O - 65283 - 17462 - PM/CC/4/J - i, ii

**65332 Object**

**Respondent: Gamlingay Community Turbine (Mike Brettle) [16468]**

**Agent: N/A**

Summary: This is factually incorrect. The raw wind resource in Cambridge is actually greater than in much of Europe where wind energy projects are widespread. It ignores increasing developments in technology and widespread adoption of wind energy within urban areas and urban structures. Note also the existing wind turbine at the 'Smartlife Centre'.

Change To Plan: Replace with: -

"Cambridge is suitable for wind energy development subject to normal planning requirements"

Legally Compliant?: Yes

Full Reference: O - 65332 - 16468 - PM/CC/4/J - i, ii

**65215 Support**

**Respondent: Residents' Association of Old Newnham (Gillian Moore) [25297]**

**Agent: N/A**

Summary: The 94 RAON members were emailed on 18.12.15 with a summary of the proposed amendments to the Local Plan. The RAON committee proposed that the RAON support all the amendments. Members had until 15.1.16 to disagree with this proposal, but not one member disagreed.

Some members advocate the expansion of the market towns around Cambridge - Newmarket, Haverhill, etc. - to reduce the pressure on Cambridge to expand. This would require investment in public transport.

Change To Plan:

Legally Compliant?: Not Specified

Full Reference: S - 65215 - 25297 - PM/CC/4/J - None

**65120 Object**                      **Respondent: Dr Roger Sewell [25099]**                      **Agent: N/A**

Summary: Comment (system won't allow a neutral comment which this is intended to be): Change of use from employment to residential inside Cambridge should be permitted readily, as there are already too many jobs in Cambridge compared with residential provision. On the other hand in satellite settlements there is currently oversupply of houses compared with employment, so the opposite applies.

Change To Plan: Resulting document should reflect need to reduce jobs inside Cambridge and to provide them in satellite settlements.

Legally Compliant?: Yes

Full Reference: O - 65120 - 25099 - PM/CC/5/A - ii

**65216 Support**                      **Respondent: Residents' Association of Old Newnham (Gillian Moore) [25297]**                      **Agent: N/A**

Summary: The 94 RAON members were emailed on 18.12.15 with a summary of the proposed amendments to the Local Plan. The RAON committee proposed that the RAON support all the amendments. Members had until 15.1.16 to disagree with this proposal, but not one member disagreed.

Some members advocate the expansion of the market towns around Cambridge - Newmarket, Haverhill, etc. - to reduce the pressure on Cambridge to expand. This would require investment in public transport.

Change To Plan:

Legally Compliant?: Not Specified

Full Reference: S - 65216 - 25297 - PM/CC/5/A - None

## 65148 Object

**Respondent: HTS Estates Ltd (Nick Brown) [25218]**

**Agent: N/A**

Summary: This representation refers to PM/CC/6/A which modifies policy 45: Affordable Housing. This modification exacerbates the concerns expressed in representation ID: 26172 submitted in September 2013. The proposed modification will not assist the viability of development of brownfield sites in the City and thereby urban regeneration.

Change To Plan: An objective investigation as to the impacts of this and other policies within the Local Plan on the viability of brownfield sites within the City area to provide modern and quality living spaces. This investigation should look at actual current case studies (confidentiality to commercially sensitive information will be required).

Legally Compliant?: Yes

Full Reference: O - 65148 - 25218 - PM/CC/6/A - i, iii, iv

## 65893 Object

**Respondent: Home Builders Federation (Mr James Stevens) [15801]**

**Agent: N/A**

Summary: At the moment it is unclear how the Government's Starter Homes legislation will apply to residential sites. It seems unlikely, however, that it will be confined to Starter Homes 'exception sites'. It is more likely that it will apply to all residential sites in addition to or lieu of affordable housing. We recommend that the reference to starter Homes Exception Sites is deleted.

Change To Plan:

Legally Compliant?: Not Specified

Full Reference: O - 65893 - 15801 - PM/CC/6/A - iv

## 66185 Object

**Respondent: Histon & Impington Parish Council (Ms Chelsea Presland) [20953]**

**Agent: N/A**

Summary: HIPC is deeply concerned about the level of affordable housing being provided by developments at Northstowe and Wing and elsewhere, and regards it as imperative to strengthen the plan and delivery of the 40% that other developments in and around Cambridge are delivering in order to:

\* meet the current demand for affordable housing

\* provide the housing for the new workers needed to support both the incoming knowledge/high tech workers and also the new developments themselves.

It is self-evident that tradesmen, administrative and other support staff are necessary to keep businesses (and developments) going - and without affordable housing for workers in these categories high tech businesses will not be able to recruit and retain all the staff they need.

Change To Plan: Amend modification

Legally Compliant?: Not Specified

Full Reference: O - 66185 - 20953 - PM/CC/6/A - i, iii

## 65121 Support

**Respondent: Dr Roger Sewell [25099]**

**Agent: N/A**

Summary: Vital that such affordable housing is provided in the mix, and essential that this policy is then strictly adhered to.

Change To Plan:

Legally Compliant?: Not Specified

Full Reference: S - 65121 - 25099 - PM/CC/6/A - None

## 65217 Support

**Respondent: Residents' Association of Old Newnham (Gillian Moore) [25297]**

**Agent: N/A**

Summary: The 94 RAON members were emailed on 18.12.15 with a summary of the proposed amendments to the Local Plan. The RAON committee proposed that the RAON support all the amendments. Members had until 15.1.16 to disagree with this proposal, but not one member disagreed.

Some members advocate the expansion of the market towns around Cambridge - Newmarket, Haverhill, etc. - to reduce the pressure on Cambridge to expand. This would require investment in public transport.

Change To Plan:

Legally Compliant?: Not Specified

Full Reference: S - 65217 - 25297 - PM/CC/6/A - None

## 65272 Support

**Respondent:** Rustat Road Neighbourhood Association (Mr Roger Crabtree) [16745] **Agent:** N/A

**Summary:** In view of repeated attempts by developers to wriggle out of affordable housing quotas, together with government regulations which are biased towards developers, it is vital that the wording of our Local Plan is as clear and watertight as is possible. The suggested revised Affordable Housing SPD must be practical, defensible and unambiguous; thus providing a sound defence against developers seeking to circumvent it

**Change To Plan:**

**Legally Compliant?:** Not Specified

**Full Reference:** S - 65272 - 16745 - PM/CC/6/A - None

## 65796 Support

**Respondent:** Historic England (Mr David Grech) [23622] **Agent:** N/A

**Summary:** Aside from this, we do not object to the other main modifications proposed to the Cambridge Local Plan in respect of Written Ministerial Statements as set out in paragraph 2.55, nor do we object to the main modifications proposed to the South Cambridgeshire Local Plan in respect of the Written Ministerial Statements as set out in paragraph 2.56, 2.67 and 2.58 of the Joint Consultation Report.

**Change To Plan:**

**Legally Compliant?:** Not Specified

**Full Reference:** S - 65796 - 23622 - PM/CC/6/A - None

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## 65261 Object

**Respondent:** Mr Ze'ev Feigis [25329] **Agent:** N/A

**Summary:** In Cambridge student accommodation is an easy choice for developers to build small rooms in central areas without being subject to any quality or space standards. The local authority can and should act above and beyond the minimum required in the National Policy in this case due to its special status as a university city.

**Change To Plan:** Rather than following the wrongdoing in the national level, the Council should lead the curriculum on this matter, and adopt the University of Cambridge standards for all student accommodation projects as a minimum.

**Legally Compliant?:** Yes

**Full Reference:** O - 65261 - 25329 - PM/CC/6/B - i, iii

## 65218 Support

**Respondent:** Residents' Association of Old Newnham (Gillian Moore) [25297] **Agent:** N/A

**Summary:** The 94 RAON members were emailed on 18.12.15 with a summary of the proposed amendments to the Local Plan. The RAON committee proposed that the RAON support all the amendments. Members had until 15.1.16 to disagree with this proposal, but not one member disagreed.

Some members advocate the expansion of the market towns around Cambridge - Newmarket, Haverhill, etc. - to reduce the pressure on Cambridge to expand. This would require investment in public transport.

**Change To Plan:**

**Legally Compliant?:** Not Specified

**Full Reference:** S - 65218 - 25297 - PM/CC/6/B - None



**65265 Object**                      **Respondent: Mr Ze'ev Feigis [25329]**                      **Agent: N/A**

Summary: Unless some space standards will be applied to HMO and Sui Generis uses developers will find this as a default preferred to the building of new homes. In Cambridge where there is a high demand for accommodation for students the HMO will become a better investment than building high quality and much needed homes.

Change To Plan: Due to its special status as an esteemed university city which is promoting innovative thought and quality the council should demand a better quality accommodation in HMOs. It should apply minimum room sizes as per residential space standards, as well as minimum living, kitchen and dining spaces

Legally Compliant?: Yes

Full Reference: O - 65265 - 25329 - PM/CC/6/C - i, iii

**65894 Object**                      **Respondent: Home Builders Federation (Mr James Stevens) [15801]**                      **Agent: N/A**

Summary: Lifetime Homes has demised as an appropriate construction standard. The Council may specify Part M4(2) and Part M4(3) instead, subject to meeting the necessary tests of necessity and cost, as set out in the NPPG. This reference in paragraph 6.22 should be deleted to avoid any confusion.

Change To Plan:

Legally Compliant?: Not Specified

Full Reference: O - 65894 - 15801 - PM/CC/6/C - iv

**65219 Support**                      **Respondent: Residents' Association of Old Newnham (Gillian Moore) [25297]**                      **Agent: N/A**

Summary: The 94 RAON members were emailed on 18.12.15 with a summary of the proposed amendments to the Local Plan. The RAON committee proposed that the RAON support all the amendments. Members had until 15.1.16 to disagree with this proposal, but not one member disagreed.

Some members advocate the expansion of the market towns around Cambridge - Newmarket, Haverhill, etc. - to reduce the pressure on Cambridge to expand. This would require investment in public transport.

Change To Plan:

Legally Compliant?: Not Specified

Full Reference: S - 65219 - 25297 - PM/CC/6/C - None

**65147 Object**

**Respondent: HTS Estates Ltd (Nick Brown) [25218]**

**Agent: N/A**

Summary: This representation refers to PM/CC/6/D which modifies policy 50: Residential Space Standards. This modification exacerbates the concerns expressed in representation ID: 26174 submitted in September 2013. The proposed modification will further compromise the viability of development of brownfield sites in the City and thereby urban regeneration.

Change To Plan: An objective investigation as to the impacts of this and other policies within the Local Plan on the viability of brownfield sites within the City area to provide modern and quality living spaces. This investigation should look at actual current case studies (confidentiality to commercially sensitive information will be required).

Legally Compliant?: Yes

Full Reference: O - 65147 - 25218 - PM/CC/6/D - i, iii, iv

**65327 Object**

**Respondent: Mr Ze'ev Feigis [25329]**

**Agent: N/A**

Summary: Fully support the adoption of National Space Standards as the bare minimum. However, the council could aspire to propose better and more accurate conditions than recommended by the document in order to become a true leader in national level, as it does in all other aspects.

Change To Plan: As a county in which property is highly sought after and circa 40000 new homes are planned to be built until 2031, it is reasonable to believe that the market cost will cover any additional developers expenses which may be used to better the quality of accommodation for the generations to come. The national space standards were drawn after the industry leading documents produced for the Mayor of London Housing SPG in which a more detailed, and more demanding quality benchmarks were established. This is the minimum standard the plan should seek to embed, since by aspiring for the recommended minimum Cambridge and South Cambs lacks the visionary spirit in which this area is know for. Innovation, aspiration for the better and far-sight vision should guide the Local Plan's requirements for the next 15 years to safeguard wellbeing and quality of life of both current and future residents.

Legally Compliant?: Yes

Full Reference: O - 65327 - 25329 - PM/CC/6/D - iii

**65895 Object**

**Respondent: Home Builders Federation (Mr James Stevens) [15801]**

**Agent: N/A**

Summary: NPPG 3 tests before Nationally Described Space Standards can be adopted as local plan policy:  
\* Need, including potential impact on providing Starter Homes;  
\* Viability including impact of affordability; and  
\* Timing

No assessment of need. Unclear whether homes built in Cambridge typically smaller than NDSS. Case for adopting NDSS not been made. Unclear how would affect provision of Starter Homes.

Viability - Council concluded standards not 'materially affect' viability (paragraph 2.2.12). Not assessed impact on affordability. Ensure cater for all groups, not just wealthy.

External residential space standards not covered by WMS, but unsound in view of development pressures within Cambridge.

Unclear what Council is stipulating in terms of optional technical standards for accessibility.

Cost of complying with Part M4(2) and Part M4 (3) treated as 'potential variable cost' - unclear.

Change To Plan:

Legally Compliant?: Not Specified

Full Reference: O - 65895 - 15801 - PM/CC/6/D - iv

**65220 Support**      **Respondent: Residents' Association of Old Newnham (Gillian Moore) [25297]**      **Agent: N/A**

Summary: The 94 RAON members were emailed on 18.12.15 with a summary of the proposed amendments to the Local Plan. The RAON committee proposed that the RAON support all the amendments. Members had until 15.1.16 to disagree with this proposal, but not one member disagreed.

Some members advocate the expansion of the market towns around Cambridge - Newmarket, Haverhill, etc. - to reduce the pressure on Cambridge to expand. This would require investment in public transport.

Change To Plan:  
Legally Compliant?: Not Specified

Full Reference: S - 65220 - 25297 - PM/CC/6/D - None

**65798 Support**      **Respondent: Historic England (Mr David Grech) [23622]**      **Agent: N/A**

Summary: Aside from this, we do not object to the other main modifications proposed to the Cambridge Local Plan in respect of Written Ministerial Statements as set out in paragraph 2.55, nor do we object to the main modifications proposed to the South Cambridgeshire Local Plan in respect of the Written Ministerial Statements as set out in paragraph 2.56, 2.67 and 2.58 of the Joint Consultation Report.

Change To Plan:  
Legally Compliant?: Not Specified

Full Reference: S - 65798 - 23622 - PM/CC/6/D - None

**65979 Support**      **Respondent: Hallmark Hotels (Bar Hill) Ltd [25472]**      **Agent: CgMs (Matthew Roe) [25471]**

Summary: We support the modification to Policy 50 to ensure development complies with the National Prescribed Space Standards.

The evidence base on which this proposed modification is built upon is considered to be justified. We therefore support this policy for new developments coming forward within Cambridgeshire and South Cambridgeshire. However, we would recommend that a degree of flexibility is adopted to the housing space standards to allow sustainable and brownfield sites to come forward for housing.

Change To Plan:  
Legally Compliant?: Not Specified

Full Reference: S - 65979 - 25472 - PM/CC/6/D - None

**66002 Object**

**Respondent: Commercial Estates Group [17653]**

**Agent: Nathaniel Lichfield & Partners (Mr Matthew Spry) [20555]**

Summary: Reviewed updated evidence base and remain concerned there is insufficient evidence to support spatial distribution of housing growth around Cambridge and South Cambridgeshire.

Latest transport and infrastructure studies do not support chosen locations for housing, including Land North of Cherry Hinton. Support Plans which maximise development on edge of Cambridge in principle, but insufficient transport and infrastructure evidence to justify increased allocation in this location during plan period. CEG notes Council does not explain why increase is justified in the reasons for this main modification.

Representation supported by range of technical papers which form part of and support this representation, including Technical Papers on Transport and Infrastructure OAHN (Appendices 4 and 5). Papers provide a critique of latest assessments and sets out reasons why proposed transport strategy and infrastructure will not adequately support growth or deliver sustainable development.

Relevant Attachment  
Cambridge South East 1.4 Section 2  
Appendix 4 (Transport) and 5 (Infrastructure)

Change To Plan: Amend modification

Legally Compliant?: Not Specified

Full Reference: O - 66002 - 17653 - PM/CC/B/A - i, ii, iii, iv

**65221 Support**

**Respondent: Residents' Association of Old Newnham (Gillian Moore) [25297]**

**Agent: N/A**

Summary: The 94 RAON members were emailed on 18.12.15 with a summary of the proposed amendments to the Local Plan. The RAON committee proposed that the RAON support all the amendments. Members had until 15.1.16 to disagree with this proposal, but not one member disagreed.

Some members advocate the expansion of the market towns around Cambridge - Newmarket, Haverhill, etc. - to reduce the pressure on Cambridge to expand. This would require investment in public transport.

Change To Plan:

Legally Compliant?: Not Specified

Full Reference: S - 65221 - 25297 - PM/CC/B/A - None

**65785 Support**

**Respondent: Historic England (Mr David Grech) [23622]**

**Agent: N/A**

Summary: In respect of Housing Land Supply, Historic England has reviewed the revised housing allocation map (Figure 3.2) prepared by the Councils and again we do not wish to comment in detail on either the New Proposal site in the City or the New Proposal Site in SCDC.

We therefore do not object to the main modifications proposed to the Cambridge Local Plan in respect of the Development Strategy as set out in paragraphs 2.40 and 2.41 of the Report.

Change To Plan:

Legally Compliant?: Not Specified

Full Reference: S - 65785 - 23622 - PM/CC/B/A - None

**65222 Support**      **Respondent: Residents' Association of Old Newnham (Gillian Moore) [25297]**      **Agent: N/A**

Summary: The 94 RAON members were emailed on 18.12.15 with a summary of the proposed amendments to the Local Plan. The RAON committee proposed that the RAON support all the amendments. Members had until 15.1.16 to disagree with this proposal, but not one member disagreed.

Some members advocate the expansion of the market towns around Cambridge - Newmarket, Haverhill, etc. - to reduce the pressure on Cambridge to expand. This would require investment in public transport.

Change To Plan:

Legally Compliant?: Not Specified

Full Reference: S - 65222 - 25297 - PM/CC/Policies Map/A - None

**65786 Support**      **Respondent: Historic England (Mr David Grech) [23622]**      **Agent: N/A**

Summary: In respect of Housing Land Supply, Historic England has reviewed the revised housing allocation map (Figure 3.2) prepared by the Councils and again we do not wish to comment in detail on either the New Proposal site in the City or the New Proposal Site in SCDC.

We therefore do not object to the main modifications proposed to the Cambridge Local Plan in respect of the Development Strategy as set out in paragraphs 2.40 and 2.41 of the Report.

Change To Plan:

Legally Compliant?: Not Specified

Full Reference: S - 65786 - 23622 - PM/CC/Policies Map/A - None

**65685 Object**      **Respondent: Paul Beskeen [22409]**      **Agent: N/A**

Summary: The new evidence and Main Modifications fail to address the Inspectors' concerns regarding the infrastructure requirements and sustainable transport options that would be needed to deliver truly sustainable new settlements.

Local Plans CSRM - Cambridge and South Cambridgeshire Local Plans Transport Report (RD/MC/070)

Change To Plan: Delete the modification.

Legally Compliant?: Not Specified

Full Reference: O - 65685 - 22409 - MM/CC/2/A - i, iii, iv

**65223 Support**      **Respondent: Residents' Association of Old Newnham (Gillian Moore) [25297]**      **Agent: N/A**

Summary: The 94 RAON members were emailed on 18.12.15 with a summary of the proposed amendments to the Local Plan. The RAON committee proposed that the RAON support all the amendments. Members had until 15.1.16 to disagree with this proposal, but not one member disagreed.

Some members advocate the expansion of the market towns around Cambridge - Newmarket, Haverhill, etc. - to reduce the pressure on Cambridge to expand. This would require investment in public transport.

Change To Plan:

Legally Compliant?: Not Specified

Full Reference: S - 65223 - 25297 - MM/CC/2/A - None

**65224 Support**      **Respondent:** Residents' Association of Old Newnham (Gillian Moore) [25297]      **Agent:** N/A

Summary: The 94 RAON members were emailed on 18.12.15 with a summary of the proposed amendments to the Local Plan. The RAON committee proposed that the RAON support all the amendments. Members had until 15.1.16 to disagree with this proposal, but not one member disagreed.

Some members advocate the expansion of the market towns around Cambridge - Newmarket, Haverhill, etc. - to reduce the pressure on Cambridge to expand. This would require investment in public transport.

Change To Plan:

Legally Compliant?: Not Specified

Full Reference: S - 65224 - 25297 - MM/CC/3/A - None

**65305 Object**                      **Respondent:** Barratt Eastern Counties and the North West Cambridge Consortium of Landowners [17788]                      **Agent:**    BIDWELLS LLP (MISS MARCIA WHITEHEAD) [25328]

Summary: We object to the Proposed Modification to Paragraph 2.11 increasing the Council's housing target by 500 homes to 19,500 dwellings. The Further Evidence in relation to the OAN to which the Proposed Modification refers is flawed and fails to fully consider economic trends.

Consequently, the Council's housing requirement is not founded on robust evidence prepared in a manner compliant with the NPPF and PPG. The Inspectors' concerns have not been fully addressed and the Council's Housing target still does not meet the OAN. The Proposed Modifications are therefore unsound as they are not:

- \* positively prepared;
- \* justified;
- \* consistent with National Policy.

Change To Plan: The proposed housing requirement referred to in the Proposed Modification to Paragraph 2.11 should be increased and that further amendments should be made to the proposed wording of the paragraph to reflect this.

In our previous Matter 3 Written Statement we stated that the housing target should be at least 24,400 dwellings for South Cambridgeshire which we maintain is still the case.

It is considered that this revised approach would enable the Council to meet the objectively assessed housing needs for Cambridge in full and boost significantly the supply of housing in accordance with the requirements of Government guidance in the NPPF paragraphs 47 and 159. As such, this will ensure that the Plan is Sound.

Legally Compliant?: No

Full Reference: O - 65305 - 17788 - PM/SC/2/A - i, ii, iv

**65333 Object**                      **Respondent:** Mr Brian Williams [17286]                      **Agent:**    N/A

Summary: SCDC have failed to take account of the advice in the SDSR (Sustainable Development Strategy Review) suggesting that building on the edge of Cambridge will assist in the viability and sustainability of new housing as the provision of infrastructure should be less costly due to the ability to take advantage of existing infrastructure and people are more likely to use environmentally friendly forms of transport due to the proximity of home to work and services.

There would also appear to be some doubt of the ability to fund the infrastructure required for new settlements as they are the biggest contributor to an SDSR funding shortfall of £1.3 Billion (Infrastructure Delivery Study Update 2013) we may have to accept that if we are to grow Cambridge then the Urban part of the City must spread out. This is the most expedient and cost effective way to expand and ticks all the boxes on the development sequence in a positive way.

The SDSR clearly supports this view, the Sustainable Development Sequence Maintenance Matrix (P16) providing a stark visual display of how much more viable the Edge of Cambridge is compared to the other options.

Change To Plan: Building should be concentrated on the edge of Cambridge and Green belt sacrificed if necessary  
Recognition of fact that SCDC assessment of sustainability is easier and cheaper on the edge of Cambridge  
New development focussed on the edge of Cambridge to maximise sustainability and viability.

Legally Compliant?: Yes

Full Reference: O - 65333 - 17286 - PM/SC/2/A - i, ii, iii, iv

**65334 Object**                      **Respondent:** Mr Brian Williams [17286]                      **Agent:**    N/A

Summary: The SDSR clearly supports this view, the Sustainable Development Sequence Maintenance Matrix (P16) providing a stark visual display of how much more viable the Edge of Cambridge is compared to the other options.

Change To Plan: New development focussed on the edge of Cambridge to maximise sustainability and viability.

Legally Compliant?: Yes

Full Reference: O - 65334 - 17286 - PM/SC/2/A - i, ii, iii, iv

## 65335 Object

**Respondent: Mr Brian Williams [17286]**

**Agent: N/A**

Summary: There would also appear to be some doubt of the ability to fund the infrastructure required for new settlements as they are the biggest contributor to an SDSR funding shortfall of £1.3 Billion (Infrastructure Delivery Study Update 2013)  
we may have to accept that if we are to grow Cambridge then the Urban part of the City must spread out. This is the most expedient and cost effective way to expand and ticks all the boxes on the development sequence in a positive way.

Change To Plan: Recognition of fact that SCDC assessment of sustainability is easier and cheaper on the edge of Cambridge

Legally Compliant?: Yes

Full Reference: O - 65335 - 17286 - PM/SC/2/A - i, ii, iii, iv

## 65436 Object

**Respondent: Pigeon Land & LIH [25320]**

**Agent: CODE Development Planners Ltd (Ms Karen Beech) [25295]**

Summary: The level of objectively assessed housing need has been under-estimated for:  
1. The demographic projections have not been adjusted to take account of the assumption that household formation amongst younger households is suppressed.  
2. Economic growth expectations have not been addressed so there is a misalignment between jobs and homes.  
3. Significant key market signals; land values and past under delivery have not been considered.  
4. No adjustment has been made to take account of the level of affordable housing need.  
5. The full objectively assessed housing requirement for Cambridge is 15,200 dwellings and for South Cambridgeshire is 27,000 dwellings.

Relevant documents:

\*GLHearn Report - Whole Document

\*160125\_CSTpt.pdf - Executive summary; Section 1 - Introduction - para 1.1 to 1.6; Section 2 - OAHN & Housing Need - Section 2.1 (2.1.1 to 2.1.13); Section 7 - Conclusions - para 7.1 to 7.6

Change To Plan: In order to make the Local Plans sound in respect of objectively assessed housing needs, the housing requirement should be increased to reflect the full objectively assessed housing need resulting in a figure of 15,200 in Cambridge and 27,000 in South Cambridgeshire.

Legally Compliant?: Yes

Full Reference: O - 65436 - 25320 - PM/SC/2/A - i, ii, iii, iv

## 65470 Object

**Respondent: Bidwells (Miss Marcia Whitehead) [17324]**

**Agent: Bidwells LLP (Alison Barnes) [25318]**

Summary: Bidwells object to the Proposed Modification to Paragraph 2.11 increasing the Council's housing target by 500 homes to 19,500 dwellings. The Further Evidence in relation to the OAN to which the Proposed Modification refers is flawed and fails to fully consider economic trends.

The Council's housing requirement is not founded on robust evidence prepared in a manner compliant with the NPPF and PPG. The Inspectors' concerns have not been fully addressed and the Council's Housing target still does not meet the OAN. The Proposed Modifications are therefore unsound as they are not:

\* positively prepared;

\* justified;

\* consistent with National Policy.

Change To Plan: Bidwells therefore consider that the proposed housing requirement referred to in the Proposed Modification to Paragraph 2.11 should be amended and increased and that further amendments should be made to the proposed wording of the paragraph to reflect this.

In our previous Matter 3 Written Statement we stated that the housing target should be at least 24,400 dwellings for South Cambridgeshire which we maintain is still the case.

It is considered that this revised approach would enable the Council to meet the objectively assessed housing needs for Cambridge in full and boost significantly the supply of housing in accordance with the requirements of Government guidance in the NPPF paragraphs 47 and 159. As such, this will ensure that the Plan is Sound.

Legally Compliant?: No

Full Reference: O - 65470 - 17324 - PM/SC/2/A - i, ii, iv



## 65516 Object

**Respondent: Endurance Estates Limited [19174]**

**Agent: Bidwells LLP (Susan Chappell) [25316]**

Summary: Endurance Estates object to the Proposed Modification to Paragraph 2.11 increasing the Council's housing target by 500 homes to 19,500 dwellings. The Further Evidence in relation to the OAN to which the Proposed Modification refers is flawed and fails to fully consider economic trends.

The Council's housing requirement is not founded on robust evidence prepared in a manner compliant with the NPPF and PPG. The Inspectors' concerns have not been fully addressed and the Council's Housing target still does not meet the OAN. The Proposed Modifications are unsound as they are not:

- \* positively prepared;
- \* justified;
- \* consistent with National Policy.

Change To Plan: Endurance Estates therefore consider that the proposed housing requirement referred to in the Proposed Modification to Paragraph 2.11 should be amended and increased and that further amendments should be made to the proposed wording of the paragraph to reflect this.

In our previous Matter 3 Written Statement we stated that the housing target should be at least 24,400 dwellings for South Cambridgeshire which we maintain is still the case.

It is considered that this revised approach would enable the Council to meet the objectively assessed housing needs for Cambridge in full and boost significantly the supply of housing in accordance with the requirements of Government guidance in the NPPF paragraphs 47 and 159. As such, this will ensure that the Plan is Sound.

Endurance Estates therefore consider that the proposed housing requirement referred to in the Proposed Modifications to Paragraph 2.17 should be increased to 17,930 dwellings and that further amendments should be made to the proposed wording of the paragraph to reflect this.

This revised approach would enable the Council to meet the objectively assessed housing needs for Cambridge in full and boost significantly the supply of housing in accordance with the requirements of the NPPF paragraphs 47 and 159 such that the Plan is Sound.

Legally Compliant?: No

Full Reference: O - 65516 - 19174 - PM/SC/2/A - i, ii, iv

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## 65562 Object

**Respondent: Unwins and Biggs [25382]**

**Agent: Bidwells LLP (Alison Barnes) [25318]**

Summary: Unwins and Biggs object to the Proposed Modification to Paragraph 2.11 increasing the Council's housing target by 500 homes to 19,500 dwellings. The Further Evidence in relation to the OAN to which the Proposed Modification refers is flawed and fails to fully consider economic trends.

The Council's housing requirement is not founded on robust evidence prepared in a manner compliant with the NPPF and PPG. The Inspectors' concerns have not been fully addressed and the Council's Housing target still does not meet the OAN. The Proposed Modifications are therefore unsound as they aren't:

- \* positively prepared;
- \* justified;
- \* consistent with National Policy.

Change To Plan: Unwins and Biggs therefore consider that the proposed housing requirement referred to in the Proposed Modification to Paragraph 2.11 should be amended and increased and that further amendments should be made to the proposed wording of the paragraph to reflect this.

In our previous Matter 3 Written Statement we stated that the housing target should be at least 24,400 dwellings for South Cambridgeshire which we maintain is still the case.

It is considered that this revised approach would enable the Council to meet the objectively assessed housing needs for Cambridge in full and boost significantly the supply of housing in accordance with the requirements of Government guidance in the NPPF paragraphs 47 and 159. As such, this will ensure that the Plan is Sound.

Legally Compliant?: No

Full Reference: O - 65562 - 25382 - PM/SC/2/A - i, ii, iv

## 65573 Object

**Respondent: Pembroke College & the Balaam Family [21173]**

**Agent: Bidwells LLP (Susan Chappell) [25316]**

Summary: Pembroke College & the Balaam Family object to Proposed Modification to Paragraph 2.11 increasing the Council's housing target by 500 homes to 19,500 dwellings. Further Evidence in relation to the OAN to which the Proposed Modification refers is flawed and fails to fully consider economic trends.

The Council's housing requirement is not founded on robust evidence prepared in a manner compliant with the NPPF and PPG. The Inspectors' concerns have not been fully addressed and the Council's Housing target still does not meet the OAN. Proposed Modifications are unsound as they are not:

- \* positively prepared;
- \* justified;
- \* consistent with National Policy.

Change To Plan: Pembroke College & the Balaam Family therefore consider that the proposed housing requirement referred to in the Proposed Modification to Paragraph 2.11 should be amended and increased and that further amendments should be made to the proposed wording of the paragraph to reflect this.

In our previous Matter 3 Written Statement we stated that the housing target should be at least 24,400 dwellings for South Cambridgeshire which we maintain is still the case.

It is considered that this revised approach would enable the Council to meet the objectively assessed housing needs for Cambridge in full and boost significantly the supply of housing in accordance with the requirements of Government guidance in the NPPF paragraphs 47 and 159. As such, this will ensure that the Plan is Sound.

Legally Compliant?: No

Full Reference: O - 65573 - 21173 - PM/SC/2/A - i, ii, iv

## 65873 Object

**Respondent: Waterbeach Parish Council (Liz Jones) [17084]**

**Agent: N/A**

Summary: SCDC failed to take account of SCDR suggesting building on edge of Cambridge will assist in viability and sustainability of new housing as provision of infrastructure less costly due to ability to use existing infrastructure and people are more likely to use environmentally friendly forms of transport due to proximity.

SCDR supports this view, Sustainable Development Sequence Maintenance Matrix (P16) shows how far ahead Edge of Cambridge is compared to other options.

Some doubt of ability to fund infrastructure required for new settlements - biggest contributor to funding shortfall of £1.3 Billion (Infrastructure Delivery Study Update 2013)

If we are to grow Cambridge then Urban part of City must spread out. Most expedient and cost effective way to expand and ticks all boxes on development sequence in positive way.

Change To Plan:

Legally Compliant?: Not Specified

Full Reference: O - 65873 - 17084 - PM/SC/2/A - None

## 65896 Object

**Respondent: Home Builders Federation (Mr James Stevens) [15801]**

**Agent: N/A**

Summary: An uplift greater than the planned 10% is warranted in South Cambridgeshire to help tackle affordability pressures and facilitate the supply of more affordable housing.

We consider that the OAN for South Cambridgeshire to be 21,095 dwellings. This should be rounded down to 21,000 for the purposes of the plan, generating an annual average of 1,050 dwellings.

Change To Plan:

Legally Compliant?: Not Specified

Full Reference: O - 65896 - 15801 - PM/SC/2/A - ii

## 65929 Object

**Respondent: Cambridge Past Present and Future (Ms Stacey Weiser) [20942]**

**Agent: N/A**

Summary: CambridgePPF supports the 2015 re-calculation of the objectively assessed housing needs for South Cambridgeshire of 19,337 new homes, rounded up to a housing target of 19,500 for the plan period.

However, we believe the Council should prepare its Register of Brownfield sites, the development of which should be a higher priority in the development sequence than greenfield sites, especially in the Green Belt.

Change To Plan:

Legally Compliant?: Not Specified

Full Reference: O - 65929 - 20942 - PM/SC/2/A - None

## 65981 Object

**Respondent: Scott Properties [25474]**

**Agent: Barton Willmore (Lauren Dooley) [25473]**

Summary: Objectively Assessed Need: The PBA Study concludes that DCLG 2012 projections predict growth of 17,579 new dwellings in South Cambridgeshire. This is below the SHMA prediction. We would argue that the SHMA findings should not be readily dismissed in light of the DCLG predictions being lower, and that the prudent approach would be to take the higher figure set out in the SHMA.

Market Signals: We would argue that insufficient evidence has been put forward in the PBA Study to suggest that the 10% uplift should apply or is appropriate to South Cambridgeshire and that the uplift to take into account market signals should be applied to the SHMA prediction of 19,000 dwellings. If the uplift was agreed at 10%, the OAN in South Cambridgeshire would be 20,900 dwellings.

City Deal: The housing figure for South Cambridgeshire does not meet OAN plus the 1,000 units agreed through City Deal on rural exception sites.

Change To Plan:

Legally Compliant?: Not Specified

Full Reference: O - 65981 - 25474 - PM/SC/2/A - None

## 66049 Object

**Respondent: Laragh Homes [25312]**

**Agent: Strutt & Parker LLP (Mr Jon Jennings) [25077]**

Summary: While it is not disputed that Cambridge is a significant influencing factor on the Development Strategy for South Cambridgeshire it is not considered that sufficient account has been taken of the development needs of the surrounding districts and their relationship with Cambridge and South Cambridgeshire District. The opportunity to allocate further sites in sustainable locations to broaden the supply of housing in the earlier parts of the plan has not been taken into account.

Change To Plan: Delete & Amend modification

Legally Compliant?: Not Specified

Full Reference: O - 66049 - 25312 - PM/SC/2/A - i, ii, iii, iv

## 66062 Object

**Respondent: South Cambridgeshire Green Party (Miss Eleanor Crane) [25357]**

**Agent: N/A**

Summary: Increasing the estimated housing requirement to 19,500:

- \* Green Belt protection must not be weakened;
- \* Objective of plan should be to achieve sustainability and quality of life, not simply to service projected growth in jobs;
- \* Housing need should first be met through better use of existing stock (empty dwellings, second homes, under-occupancy);
- \* A range of options should be explored to ensure new housing is genuinely affordable for the majority of people, including social and commonly owned housing.

Change To Plan:

Legally Compliant?: Not Specified

Full Reference: O - 66062 - 25357 - PM/SC/2/A - None

## 66102 Object

**Respondent: Grosvenor Developments Ltd and USS [25482]**

**Agent: Savills (Mr Colin Campbell) [15804]**

Summary: Updated assessment of housing need is not considered to be appropriate evidence to justify the plan.

Cambridge prices stand 45% above the 2007/08, South Cambridgeshire are at +25%. In E&W prices are c2.5% above 2007/08 peak.

Canterbury and Uttlesford currently c20% above 2007 peak, and Eastleigh is c10% above. Eastleigh is not comparable to South Cambridgeshire. Canterbury is more appropriate for comparison with South Cambridgeshire.

South Cambridgeshire uplift should be significantly higher than 20% and a strong case that it should be higher than Canterbury.

Cambridge City significantly outstrips Canterbury. Uplift for market signals should be significantly higher than 30%.

Change To Plan: Amend modification

Legally Compliant?: Not Specified

Full Reference: O - 66102 - 25482 - PM/SC/2/A - i, ii, iii, iv

## 66140 Object

**Respondent: North Barton Road Land Owners Group [21302]**

**Agent: Carter Jonas LLP (Brian Flynn) [17331]**

Summary: The PBA Report does not provide a guidance-compliant assessment of Objectively-Assessed Housing Need. It is flawed because it fails to consider:

-The plans' economic aspirations and the level of housing provision necessary to support this;

-Assumptions inherent in demographic modelling; and

-land values as a market signal, which point to constrained residential land supply in Cambridge. This is in conflict with the PPG.

Relevant attachments:

-Jan Representations OAN (25.01.16).pdf

-North BRLOG LP Mods Jan 2016.pdf : Paragraphs 30 to 35.pdf

Change To Plan: We request that the housing target for South Cambridgeshire in Policy S/5 should be increased to 27,000 dwellings between 2011 and 2031. The unmet needs from Cambridge should be met within South Cambridgeshire through the DtC and added to the requirement in Draft SCLP.

Legally Compliant?: Not Specified

Full Reference: O - 66140 - 21302 - PM/SC/2/A - i, ii, iv

## 66147 Object

**Respondent: South Barton Road Land Owners Group [21301]**

**Agent: Carter Jonas LLP (Brian Flynn) [17331]**

Summary: Relevant paragraphs of supporting document: 14 to 20.

Do not agree with Objectively Assessed Housing Need - Further Evidence (prepared by Peter Brett Associates), which supports the modification for the following reasons:

\*It ignores the plans' economic aspirations and the level of housing provision necessary to support this;

\*It fails to consider assumptions inherent in demographic modelling used on household formation rates;

\*It does not consider land values as a market signal;

\*It is dismissive of the affordable housing need.

The Plans' housing assumption will result in a deterioration of affordable housing, constrain economic growth and create a shortfall in housing delivery. 15,200 should be provided in Cambridge and 27,000 in South Cambridgeshire.

Change To Plan: We request that the housing target for South Cambridgeshire in Policy S/5 should be increased to X dwellings between 2011 and 2031. The unmet needs from Cambridge, which equates to approximately X dwellings, should be met within South Cambridgeshire through the DtC and added to the requirement in Draft SCLP.

Legally Compliant?: Not Specified

Full Reference: O - 66147 - 21301 - PM/SC/2/A - i, ii, iii, iv

## 66166 Object

**Respondent: Great Shelford Ten Acres Limited [8948]**

**Agent: Bidwells (Mrs Stacey Rawlings) [3140]**

Summary: The modification does not accurately reflect the conclusions of the additional evidence produced in respect of the Green Belt and perpetuates the inconsistency with the spatial strategy set out within Policy S/1, particularly in relation to the rural areas and villages in the Green Belt, where development is directed to villages lower in the rural hierarchy, outside of the Green Belt.

See attached documents:

\* PM\_SC\_2\_A.pdf

\* Critique of the Councils' Sustainability Appraisal.pdf

\* Critique of the Councils' Housing Land Supply.pdf

\* Critique of the Councils' OAN.pdf

Change To Plan: Amend modification:

Additional land at the more sustainable villages should be released from the Green Belt to meet the rural housing needs of South Cambridgeshire.

Legally Compliant?: Not Specified

Full Reference: O - 66166 - 8948 - PM/SC/2/A - i, ii, iv

## 66192 Object

**Respondent: MCA Developments Limited [3652]**

**Agent: Barton Willmore (Mr Steven Kosky) [3212]**

Summary: Section 2 identifies that upon objective review of Council's updated evidence base, MCA consider assessment of objective assessed housing need fails to meet requirements in PPG and proposed increase in housing will do little to address Inspector's concerns.

Undertaken detailed technical review of Council's updated evidence base entitled 'Objectively Assessed Housing Need: Further Evidence' - Appendix 4.

From evidence and in light of market signals, proposed increase of only 500 homes insufficient to address Inspectors' concerns. Data shows requirement for between 1,073 and 1,125 dwellings per annum. Based on numbers suggested Council would need to plan for an additional 2,460 -3,500 homes over period 2011-2031.

Unallocated part of West Cambourne Site would deliver an additional 1,150 new dwellings. Significant contribution to meeting Objectively Assessed Housing Need.

Change To Plan: Amend modification

Legally Compliant?: Not Specified

Full Reference: O - 66192 - 3652 - PM/SC/2/A - i, iii, iv

## 65276 Support

**Respondent: Rustat Road Neighbourhood Association (Mr Roger Crabtree) [16745]**

**Agent: N/A**

Summary: We are very pleased that the further investigations have broadly supported the previous assessment of future housing requirements. It is very important that this assessment is robust enough to thwart attempts by developers to develop new sites not in the plan and / or to overdevelop agreed sites

Change To Plan:

Legally Compliant?: Not Specified

Full Reference: S - 65276 - 16745 - PM/SC/2/A - None

## 65296 Support

**Respondent: Campaign to Protect Rural England (CPRE) (Miss Shirley Fieldhouse) [17302]**

**Agent: N/A**

Summary: CPRE supports the increase in the housing provision to 19,500 from 19,000. It is considered that whilst the target remains uncomfortably high, it is a relief to note that the increase is modest.

Change To Plan:

Legally Compliant?: Not Specified

Full Reference: S - 65296 - 17302 - PM/SC/2/A - None

**65407 Support**

**Respondent:** Professor Peter Landshoff [16277]

**Agent:** N/A

**Summary:** The Green Belt is important to keep Cambridge attractive, for residents and for recruiting and retaining highly-qualified staff against global competition. Intrusions into it should be allowed only under exceptional circumstances.

**Change To Plan:**

**Legally Compliant?:** Not Specified

**Full Reference:** S - 65407 - 16277 - PM/SC/2/A - None

**65691 Support**

**Respondent:** The Taylor Family & Countryside Properties (UK) Ltd [19841]

**Agent:** Andrew Martin - Planning Limited (Mr Andrew Martin) [16509]

**Summary:** We acknowledge the Local Plan evidence base has been updated in 2015 in response to the Inspectors' Letter regarding the Objectively Assessed Need for Housing and that this additional work has identified a requirement for 19,337 homes in South Cambridgeshire, which has been rounded up to 19,500 in the housing target for the plan period.

**Change To Plan:**

**Legally Compliant?:** Not Specified

**Full Reference:** S - 65691 - 19841 - PM/SC/2/A - None

**65308 Object**                      **Respondent:** Barratt Eastern Counties and the North West Cambridge Consortium of Landowners [17788]                      **Agent:**    BIDWELLS LLP (MISS MARCIA WHITEHEAD) [25328]

Summary: Paragraph 2.12 should be deleted and any shortfalls in the Council's housing land supply should be addressed through further allocations within the Plan.

It is considered that this revised approach would enable the Council to meet the objectively assessed housing needs for Cambridge in full and boost significantly the supply of housing in accordance with the requirements of Government guidance in the NPPF paragraphs 47 and 159. As such, this will ensure that the Plan is Sound.

Change To Plan: Paragraph 2.12 should be deleted and any shortfalls in the Council's housing land supply should be addressed through further allocations within the Plan.

It is considered that this revised approach would enable the Council to meet the objectively assessed housing needs for Cambridge in full and boost significantly the supply of housing in accordance with the requirements of Government guidance in the NPPF paragraphs 47 and 159. As such, this will ensure that the Plan is Sound.

Legally Compliant?: No

Full Reference: O - 65308 - 17788 - PM/SC/2/B - i, iv

**65336 Object**                      **Respondent:** Mr Brian Williams [17286]                      **Agent:**    N/A

Summary: SCDC have failed to take account of the advice in the SDSR (Sustainable Development Strategy Review) suggesting that building on the edge of Cambridge will assist in the viability and sustainability of new housing as the provision of infrastructure should be less costly due to the ability to take advantage of existing infrastructure and people are more likely to use environmentally friendly forms of transport due to the proximity of home to work and services.

Sustainable Development Sequence Maintenance Matrix (P16) providing a stark visual display of how much more viable the Edge of Cambridge is compared to the other options.

There would also appear to be some doubt of the ability to fund the infrastructure required for new settlements as they are the biggest contributor to an SDSR funding shortfall of £1.3 Billion (Infrastructure Delivery Study Update 2013)

We may have to accept that if we are to grow Cambridge then the Urban part of the City must spread out. This is the most expedient and cost effective way to expand and ticks all the boxes on the development sequence in a positive way.

Change To Plan: SCDC to follow advice of their own assessment in the SDSR.

Develop in Green Belt close to Cambridge as cheaper and easier to provide sustainability

Legally Compliant?: Yes

Full Reference: O - 65336 - 17286 - PM/SC/2/B - i, ii, iii, iv

**65342 Object**                      **Respondent:** Mr Brian Williams [17286]                      **Agent:**    N/A

Summary: There would also appear to be some doubt of the ability to fund the infrastructure required for new settlements as they are the biggest contributor to an SDSR funding shortfall of £1.3 Billion (Infrastructure Delivery Study Update 2013)

We may have to accept that if we are to grow Cambridge then the Urban part of the City must spread out. This is the most expedient and cost effective way to expand and ticks all the boxes on the development sequence in a positive way.

Change To Plan: Develop in Green belt close to Cambridge as cheaper and easier to provide sustainability

Legally Compliant?: Yes

Full Reference: O - 65342 - 17286 - PM/SC/2/B - i, ii, iii, iv

## 65472 Object

**Respondent: Bidwells (Miss Marcia Whitehead) [17324]**

**Agent: Bidwells LLP (Alison Barnes) [25318]**

Summary: Bidwells object to the Proposed Modification to Paragraph 2.12 proposing a joint housing trajectory for Cambridge and South Cambridgeshire for the purposes of phasing of housing delivery including for calculating the 5-year housing land supply.

This approach does not comply with the NPPF which requires that, to boost significantly the supply of housing, local planning authorities should identify and update annually a supply of specific deliverable sites sufficient to provide five years' worth of housing against their housing requirements.

Consequently, the Proposed Modification is unsound in that it is not:

- \* positively prepared;
- \* consistent with National Policy.

Change To Plan: Paragraph 2.12 should be deleted and any shortfalls in the Council's housing land supply should be addressed through further allocations within the Plan.

It is considered that this revised approach would enable the Council to meet the objectively assessed housing needs for Cambridge in full and boost significantly the supply of housing in accordance with the requirements of Government guidance in the NPPF paragraphs 47 and 159. As such, this will ensure that the Plan is Sound.

Legally Compliant?: No

Full Reference: O - 65472 - 17324 - PM/SC/2/B - i, iv

## 65493 Object

**Respondent: Hill Residential [25378]**

**Agent: KWA Architects (Mrs Meghan Bonner) [25377]**

Summary: We believe the Housing Trajectory Team's proposed housing numbers fail to take account of the most recent and relevant housing data provided to them and fail to make best use of the allocated land, in particular site H1:b making the policy Negatively Prepared and therefore the modification to the policy unsound.

Change To Plan: An increase in the housing allocation on site H1:b from 80 dwellings to 120 dwellings.

Legally Compliant?: No

Full Reference: O - 65493 - 25378 - PM/SC/2/B - i

## 65519 Object

**Respondent: Endurance Estates Limited [19174]**

**Agent: Bidwells LLP (Susan Chappell) [25316]**

Summary: Endurance Estates object to the Proposed Modification to Paragraph 2.12 proposing a joint housing trajectory for Cambridge and South Cambridgeshire for the purposes of phasing of housing delivery including for calculating the 5-year housing land supply.

This approach does not comply with the NPPF which requires that, to boost significantly the supply of housing, local planning authorities should identify and update annually a supply of specific deliverable sites sufficient to provide five years' worth of housing against their housing requirements.

Consequently, the Proposed Modification is unsound in that it is not:

- \* positively prepared;
- \* consistent with National Policy.

Change To Plan: Paragraph 2.12 should be deleted and any shortfalls in the Council's housing land supply should be addressed through further allocations within the Plan.

It is considered that this revised approach would enable the Council to meet the objectively assessed housing needs for Cambridge in full and boost significantly the supply of housing in accordance with the requirements of Government guidance in the NPPF paragraphs 47 and 159. As such, this will ensure that the Plan is Sound.

Legally Compliant?: No

Full Reference: O - 65519 - 19174 - PM/SC/2/B - i, iv



|                     |                                                                                                                                                                                                                                                                                                                                         |                                                                      |
|---------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------|
| <b>65563 Object</b> | <b>Respondent: Pigeon Land &amp; LIH [25320]</b>                                                                                                                                                                                                                                                                                        | <b>Agent: CODE Development Planners Ltd (Ms Karen Beech) [25295]</b> |
| Summary:            | We do not consider that Cambridge City and South Cambridgeshire should have a joint housing trajectory.                                                                                                                                                                                                                                 |                                                                      |
|                     | South Cambridgeshire and Cambridge City have separate local plans and should therefore in our view have separate housing trajectories.                                                                                                                                                                                                  |                                                                      |
|                     | This was confirmed by the inspector who considered two planning appeals at Waterbeach and said in the decision letter, dated 25 June 2014, that a joint housing trajectory would not be the correct approach.                                                                                                                           |                                                                      |
|                     | Relevant documents:160125_CSTpt.pdf                                                                                                                                                                                                                                                                                                     |                                                                      |
|                     | Executive summary<br>Section 1 - Introduction - para 1.1 to 1.6<br>Section 2 - OAHN & Housing Delivery - section 2.2 - para 2.2.1 to 2.2.5<br>Section 4 - Overall Development Strategy - para 4.1 to 4.5<br>Section 7 - Conclusions - para 7.1 to 7.6                                                                                   |                                                                      |
| Change To Plan:     | Given that Cambridge City and South Cambridgeshire are preparing separate Local Plans, each should have their own housing trajectory.                                                                                                                                                                                                   |                                                                      |
| Legally Compliant?: | Yes                                                                                                                                                                                                                                                                                                                                     |                                                                      |
| Full Reference:     | O - 65563 - 25320 - PM/SC/2/B - i, ii, iii                                                                                                                                                                                                                                                                                              |                                                                      |
| <b>65566 Object</b> | <b>Respondent: Unwins and Biggs [25382]</b>                                                                                                                                                                                                                                                                                             | <b>Agent: Bidwells LLP (Alison Barnes) [25318]</b>                   |
| Summary:            | Unwins and Biggs object to the Proposed Modification to Paragraph 2.12 proposing a joint housing trajectory for Cambridge and South Cambridgeshire for the purposes of phasing of housing delivery including for calculating the 5-year housing land supply.                                                                            |                                                                      |
|                     | This approach does not comply with the NPPF which requires that, to boost significantly the supply of housing, local planning authorities should identify and update annually a supply of specific deliverable sites sufficient to provide five years' worth of housing against their housing requirements.                             |                                                                      |
|                     | Consequently, the Proposed Modification is unsound in that it is not:                                                                                                                                                                                                                                                                   |                                                                      |
|                     | * positively prepared;<br>* consistent with National Policy.                                                                                                                                                                                                                                                                            |                                                                      |
| Change To Plan:     | Paragraph 2.12 should be deleted and any shortfalls in the Council's housing land supply should be addressed through further allocations within the Plan.                                                                                                                                                                               |                                                                      |
|                     | It is considered that this revised approach would enable the Council to meet the objectively assessed housing needs for Cambridge in full and boost significantly the supply of housing in accordance with the requirements of Government guidance in the NPPF paragraphs 47 and 159. As such, this will ensure that the Plan is Sound. |                                                                      |
| Legally Compliant?: | No                                                                                                                                                                                                                                                                                                                                      |                                                                      |
| Full Reference:     | O - 65566 - 25382 - PM/SC/2/B - i, iv                                                                                                                                                                                                                                                                                                   |                                                                      |

## 65578 Object

**Respondent: Pembroke College & the Balaam Family [21173]**

**Agent: Bidwells LLP (Susan Chappell) [25316]**

Summary: Pembroke College & the Balaam Family object to the Proposed Modification to Paragraph 2.12 proposing a joint housing trajectory for Cambridge and South Cambridgeshire for the purposes of phasing of housing delivery including for calculating the 5-year housing land supply.

This approach does not comply with the NPPF which requires that, to boost significantly the supply of housing, local planning authorities should identify and update annually a supply of specific deliverable sites sufficient to provide five years' worth of housing against their housing requirements.

The Proposed Modification is unsound in that it is not:

\* positively prepared;

\* consistent with National Policy.

Change To Plan: Paragraph 2.12 should be deleted and any shortfalls in the Council's housing land supply should be addressed through further allocations within the Plan.

It is considered that this revised approach would enable the Council to meet the objectively assessed housing needs for Cambridge in full and boost significantly the supply of housing in accordance with the requirements of Government guidance in the NPPF paragraphs 47 and 159. As such, this will ensure that the Plan is Sound.

Legally Compliant?: No

Full Reference: O - 65578 - 21173 - PM/SC/2/B - i, iv

## 65837 Object

**Respondent: CALA Homes (North Homes Counties) Ltd [25454]**

**Agent: Carter Jonas LLP (Brian Flynn) [17331]**

Summary: Paragraph 47 of the NPPF makes no provision for combined housing trajectories, and the responsibility for maintaining a five year housing supply rests with individual local planning authorities. Even where a joint plan is prepared each authority still retains overall responsibility for maintaining its own housing land supply. No alternatives to a joint housing trajectory have been considered by the Councils.

Until now no action has been taken to boost housing delivery, and the undersupply position is worsening year on year. The SC housing trajectory is currently overly optimistic in terms of delivery rates at some of the larger sites, and the housing that is actually delivered in the medium to long term will almost certainly be lower than currently predicted by the Council.

Change To Plan: We request that all references to a joint housing trajectory are deleted from Draft SCLP. We request that a more robust assessment of the sites is undertaken and the housing trajectory is adjusted accordingly.

Legally Compliant?: Not Specified

Full Reference: O - 65837 - 25454 - PM/SC/2/B - i, ii, iii, iv

## 65853 Object

**Respondent: Mr C Meadows [21155]**

**Agent: Carter Jonas LLP (Brian Flynn) [17331]**

Summary: Paragraph 47 of the NPPF makes no provision for combined housing trajectories, and the responsibility for maintaining a five year housing supply rests with individual local planning authorities. Even where a joint plan is prepared each authority still retains overall responsibility for maintaining its own housing land supply. No alternatives to a joint housing trajectory have been considered by the Councils.

Until now no action has been taken to boost housing delivery, and the undersupply position is worsening year on year. The SC housing trajectory is currently overly optimistic in terms of delivery rates at some of the larger sites, and the housing that is actually delivered in the medium to long term will almost certainly be lower than currently predicted by the Council.

Change To Plan: We request that all references to a joint housing trajectory are deleted from Draft SCLP. We request that a more robust assessment of the sites is undertaken and the housing trajectory is adjusted accordingly.

Legally Compliant?: Not Specified

Full Reference: O - 65853 - 21155 - PM/SC/2/B - i, ii, iii, iv

## 65863 Object

**Respondent: Mr Roger Worboys [3125]**

**Agent: Carter Jonas LLP (Brian Flynn) [17331]**

Summary: Paragraph 47 of the NPPF makes no provision for combined housing trajectories, and the responsibility for maintaining a five year housing supply rests with individual local planning authorities. Even where a joint plan is prepared each authority still retains overall responsibility for maintaining its own housing land supply. No alternatives to a joint housing trajectory have been considered by the Councils.

Until now no action has been taken to boost housing delivery, and the undersupply position is worsening year on year. The SC housing trajectory is currently overly optimistic in terms of delivery rates at some of the larger sites, and the housing that is actually delivered in the medium to long term will almost certainly be lower than currently predicted by the Council.

Change To Plan: We request that all references to a joint housing trajectory are deleted from Draft SCLP. We request that a more robust assessment of the sites is undertaken and the housing trajectory is adjusted accordingly.

Legally Compliant?: Not Specified

Full Reference: O - 65863 - 3125 - PM/SC/2/B - i, ii, iii, iv

## 65875 Object

**Respondent: Waterbeach Parish Council (Liz Jones) [17084]**

**Agent: N/A**

Summary: SCDC failed to take account of SCDR suggesting building on edge of Cambridge will assist in viability and sustainability of new housing as provision of infrastructure less costly due to ability to use existing infrastructure and people are more likely to use environmentally friendly forms of transport due to proximity.

SCDR supports this view, Sustainable Development Sequence Maintenance Matrix (P16) shows how far ahead Edge of Cambridge is compared to other options.

Some doubt of ability to fund infrastructure required for new settlements - biggest contributor to funding shortfall of £1.3 Billion (Infrastructure Delivery Study Update 2013)

If we are to grow Cambridge then Urban part of City must spread out. Most expedient and cost effective way to expand and ticks all boxes on development sequence in positive way.

Change To Plan:

Legally Compliant?: Not Specified

Full Reference: O - 65875 - 17084 - PM/SC/2/B - None

## 65897 Object

**Respondent: Home Builders Federation (Mr James Stevens) [15801]**

**Agent: N/A**

Summary: Unclear what Council is proposing in paragraph 2.12a. Councils not prepared a joint plan. Each will need to produce own housing trajectory supported by five year housing land supply in accordance with paragraph 47 of NPPF.

Concerned there could be confusion over five year land supply situation in each authority.

South Cambridgeshire needs to ensure delivering homes during early part of plan, as much as in later part. Cannot be delayed until latter years. If unable to demonstrate a five year supply based on annual average 967 dpa plan is unsound. Cambridge should prepare a five year housing land supply based on annual average 700 dpa and bring forward sites to ensure it achieves overall requirement of 14,000 dwellings.

Two Councils want benefit of joint plan but without surrendering political control.

Change To Plan:

Legally Compliant?: Not Specified

Full Reference: O - 65897 - 15801 - PM/SC/2/B - ii, iv

## 65930 Object

**Respondent: The Quay Estate [25458]**

**Agent: Carter Jonas LLP (Mr Richard Seamark) [15727]**

Summary: Paragraph 47 of the NPPF makes no provision for joint housing trajectories. The responsibility for maintaining a five year housing land supply rests with individual local planning authorities. It is not clear what action Cambridge City Council could take if there is a housing shortfall against the joint housing trajectory caused by the failure to deliver development at the proposed new settlements in South Cambridgeshire. The joint housing trajectory has not been assessed against sustainability objectives, no alternatives have been considered. We do not believe that SCDC's predictions of housing completions will be accurate.

Change To Plan: We request that all references to a joint housing trajectory are deleted from Draft SCLP. We request that a more robust assessment of the sites is undertaken and the housing trajectory is adjusted accordingly.

Legally Compliant?: Not Specified

Full Reference: O - 65930 - 25458 - PM/SC/2/B - i, ii, iii, iv

## 66003 Object

**Respondent: Commercial Estates Group [17653]**

**Agent: Nathaniel Lichfield & Partners (Mr Matthew Spry) [20555]**

Summary: Notwithstanding discussions in the Examination sessions to date, the modifications do not include a clear commitment to an early review of the Plans in 2019.

If the Plans are to progress based on a joint housing trajectory, this must only be on the basis of a clear commitment to an early review, which will include a further review of the Cambridge Green Belt given the concerns regarding the methodology and outcome of Green Belt reviews undertaken to date (see accompanying technical paper and earlier representations).

This representation is supported by a summary document and range of technical papers prepared by CEG which form part of and support this representation.

Relevant Attachment  
Cambridge South East 1.4 3.19-3.23  
All Appendices and 2(OAHN) and 3 (Green Belt) in particular

Change To Plan: Amend modification

Legally Compliant?: Not Specified

Full Reference: O - 66003 - 17653 - PM/SC/2/B - i, ii, iii, iv

## 66050 Object

**Respondent: Laragh Homes [25312]**

**Agent: Strutt & Parker LLP (Mr Jon Jennings) [25077]**

Summary: While it is not disputed that Cambridge is a significant influencing factor on the Development Strategy for South Cambridgeshire it is not considered that sufficient account has been taken of the development needs of the surrounding districts and their relationship with Cambridge and South Cambridgeshire District. The opportunity to allocate further sites in sustainable locations to broaden the supply of housing in the earlier parts of the plan has not been taken into account.

Change To Plan: Delete & amend modification

Legally Compliant?: Not Specified

Full Reference: O - 66050 - 25312 - PM/SC/2/B - i, ii, iii, iv

## 66057 Object

**Respondent: Laragh Homes [25312]**

**Agent: Strutt & Parker LLP (Mr Jon Jennings) [25077]**

Summary: Object to the Memorandum of Understanding between the 2 Councils that pertains to calculations for both Districts' 5 year housing land supply being considered together. NPPF advocates Authorities working together under the Duty to Cooperate but this should be used to inform allocations (para 47), rather than boosting supply of housing. South Cambridgeshire does not have constraints that warrant it to be reliant on Cambridge City for the delivery of housing. Therefore the modification is not consistent national planning policy.

Change To Plan: Delete & amend modification

Legally Compliant?: Not Specified

Full Reference: O - 66057 - 25312 - PM/SC/2/B - i, ii, iii, iv

## 66100 Object

**Respondent: Grosvenor Developments Ltd and USS [25482]**

**Agent: Savills (Mr Colin Campbell) [15804]**

Summary: Both plans identify that they are meeting that Districts own needs - no need for a joint five year housing trajectory. Significant concerns as to how the approach will work in practice and how any shortfall in the five year supply would be rectified.

NPPF para. 47 states that local planning authorities should "identify and update annually a supply of specific deliverable sites sufficient to provide five years worth of housing against their housing requirements"

Change To Plan: Delete modification

Legally Compliant?: Not Specified

Full Reference: O - 66100 - 25482 - PM/SC/2/B - None

## 66160 Object

**Respondent: Shelford Investments Ltd [21149]**

**Agent: Carter Jonas LLP (Brian Flynn) [17331]**

Summary: Relevant paragraphs in supporting document: 20 to 29

Disagree with joint trajectory for the following reasons:

\*Over-reliance on New Settlements, which will lead to delays in delivery and housing shortfall;

\*Contrary to paragraph 47 of the NPPF each council must retain overall responsibility for its own housing land supply;

\*what action Cambridge City Council could take if there is a housing shortfall against the joint housing trajectory caused by under-delivery in South Cambridgeshire;

\*No flexibility;

\*Inaccurate predictions in trajectory;

\*Not taken into account the Governments proposed 'housing delivery test';

\*Assessments on site delivery are not robust.

Change To Plan: We request that all references to a joint housing trajectory are deleted from Draft SCLP. We request that a more robust assessment of the sites is undertaken and the housing trajectory is adjusted accordingly.

Legally Compliant?: Not Specified

Full Reference: O - 66160 - 21149 - PM/SC/2/B - i, ii, iii, iv

## 66167 Object

**Respondent: Great Shelford Ten Acres Limited [8948]**

**Agent: Bidwells (Mrs Stacey Rawlings) [3140]**

Summary: Great Shelford (Ten Acres) object to the Proposed Modification to Paragraph 2.12 proposing a joint housing trajectory for Cambridge and South Cambridgeshire for the purposes of phasing of housing delivery including for calculating the 5-year housing land supply.

This approach does not comply with the NPPF which requires that, to boost significantly the supply of housing, local planning authorities should identify and update annually a supply of specific deliverable sites sufficient to provide five years' worth of housing against their housing requirements.

Consequently, the Proposed Modification is unsound in that it is not:

\* positively prepared;

\* consistent with National Policy.

See attached documents:

\* PM\_SC\_2\_B.pdf

\* Critique of the councils OAN.pdf

Change To Plan: Delete modification.

Legally Compliant?: Not Specified

Full Reference: O - 66167 - 8948 - PM/SC/2/B - i, iv

## 66193 Object

**Respondent: MCA Developments Limited [3652]**

**Agent: Barton Willmore (Mr Steven Kosky) [3212]**

Summary: Section 3 - Joint Housing Trajectory considered to be fundamentally flawed.

Primary flaw is that it is contrived, as MOU appears to mainly exist because, given its track record, now necessary for South Cambridgeshire to amalgamate future housing delivery with that of a more successful authority to avoid need for step change in long term spatial strategy of rural restraint and to avoid requirement to allocate further sites at larger settlements.

Given significant difference in land values MCA are concerned that joint housing trajectory will exacerbate affordability issues within District. Approach is predicated on South Cambridgeshire exporting its unmet housing needs into significantly more expensive HMA.

MCA consider approach to be untenable, given current level of house price inflation in City

Change To Plan: Amend modification

Legally Compliant?: Not Specified

Full Reference: O - 66193 - 3652 - PM/SC/2/B - i, iii, iv

## 66211 Object

**Respondent: North Barton Road Land Owners Group [21302]**

**Agent: Carter Jonas LLP (Brian Flynn) [17331]**

Summary: SCDC's predictions of housing completions will be accurate; historic monitoring data demonstrates lower than predicted completion rates.

There is a consistent history that less housing is actually delivered than is predicted to be delivered.

The undersupply position is worsening year on year.

The Council's housing trajectory should be treated with caution and is highly likely to be overly optimistic.

Relevant attachments:

-Jan Representations OAN (25.01.16).pdf

-Table South Cambridgeshire Housing Predictions Recorded Completions.pdf

-North BRLOG LP Mods Jan 2016.pdf : Paragraphs 53 to 54.pdf

Change To Plan: We request that all references to a joint housing trajectory are deleted from Draft SCLP. We request that a more robust assessment of the sites is undertaken and the housing trajectory is adjusted accordingly.

Legally Compliant?: Not Specified

Full Reference: O - 66211 - 21302 - PM/SC/2/B - i, ii, iv

## 66226 Object

**Respondent: Ely Diocesan Board of Finance [3062]**

**Agent: Carter Jonas LLP (Brian Flynn) [17331]**

Summary: Relevant sections of attached document: 20-24.

Contrary to NPPF paragraph 47, which makes no provision for joint trajectories. Even if it were a joint plan, authorities would still be responsible for their own housing need.

The joint trajectory is a negative response to the housing shortfall.

Not clear what action Cambridge City Council could take if there is a housing shortfall against the joint housing trajectory through under delivery in South Cambridgeshire. This would negatively affect affordable housing provision.

No action has been taken to boost delivery in South Cambridgeshire or remedy undersupply.

Change To Plan: Requested Change

We request that all references to a joint housing trajectory are deleted from Draft SCLP. We request that a more robust assessment of the sites is undertaken and the housing trajectory is adjusted accordingly.

Legally Compliant?: Not Specified

Full Reference: O - 66226 - 3062 - PM/SC/2/B - i, ii, iii, iv

## 65274 Support

**Respondent:** Rustat Road Neighbourhood Association (Mr Roger Crabtree) [16745]

**Agent:** N/A

Summary: Pleased to see a further example of joint working

Change To Plan:

Legally Compliant?: Not Specified

Full Reference: S - 65274 - 16745 - PM/SC/2/B - None

## 65297 Support

**Respondent:** Campaign to Protect Rural England (CPRE) (Miss Shirley Fieldhouse) [17302]

**Agent:** N/A

Summary: CPRE strongly supports the joint City and SCDC housing trajectory as it is entirely consistent with the sequential approach outlined in the strategy.

Change To Plan:

Legally Compliant?: Not Specified

Full Reference: S - 65297 - 17302 - PM/SC/2/B - None

## 65694 Support

**Respondent:** The Taylor Family & Countryside Properties (UK) Ltd [19841]

**Agent:** Andrew Martin - Planning Limited (Mr Andrew Martin) [16509]

Summary: We support:

\*the joint housing trajectory that reflects the close functional relationship between the Councils, the joint development strategy and the way that strategy is being built out.

\*the MoU between the two Councils. This approach reflects the duty to co-operate set out in the NPPF. The special relationship between the two authorities has already been recognised through the City Deal.

\*the Councils view that the legal requirements of the duty to co-operate have therefore been met.

\*the changes that ensure that the plan is flexible so that sites can come forward more quickly, if market forces allow.

\*the proposed modifications to delete the time limitations on the start of development at Bourn Airfield New Village and the proposal there is no restriction on faster rates of development.

\*the comment in Appendix 4e of the Housing Land Supply Update that states that the proposed modifications mean that there will be no controls on the rate of delivery of Bourn Airfield.

Change To Plan:

Legally Compliant?: Not Specified

Full Reference: S - 65694 - 19841 - PM/SC/2/B - None

## 65899 Support

**Respondent:** Wellcome Trust [20926]

**Agent:** Porta Planning (Mrs Emma Andrews) [16021]

Summary: Proposed Modification PM/SC/2/B supports the Memorandum of Understanding between Cambridge City and South Cambridgeshire District Councils to agree housing trajectories and update these each year annually in the Annual Monitoring Report. Wellcome Trust supports this principle. At the current time, the amount of development and associated infrastructure requirements has not been assessed and determined. Wellcome Trust wishes to continue to work in an open and transparent way with all statutory bodies and the local communities and as the Masterplan for the Wellcome Genome Campus Vision is developed, the Local Plan should take account of this process.

Change To Plan:

Legally Compliant?: Not Specified

Full Reference: S - 65899 - 20926 - PM/SC/2/B - None

## 65931 Support

**Respondent:** Cambridge Past Present and Future (Ms Stacey Weiser) [20942]

**Agent:** N/A

Summary: Support inclusion of new paragraph 2.12a. SCDC entirely surrounds Cambridge City which is severely limited in meeting its housing needs because of lack of development land and tightly drawn Green Belt. Recent evidence shows scale of the huge daily movement of people into and out of city - 200,000 daily movements of motor vehicles, mainly comprising commuting journeys between home and work. Common sense should dictate the housing trajectories should be considered jointly as two Councils are so inter-twined. Councils are discharging their statutory Duty to Cooperate, including the need for neighbouring authorities to plan together. 2014 Memorandum of Understanding should be accepted as material consideration.

Change To Plan:

Legally Compliant?: Not Specified

Full Reference: S - 65931 - 20942 - PM/SC/2/B - None

65337 Object

Respondent: Mr Brian Williams [17286] Agent: N/A

Summary: SCDC have failed to take account of the advice in the SDSR (Sustainable Development Strategy Review) suggesting that building on the edge of Cambridge will assist in the viability and sustainability of new housing as the provision of infrastructure should be less costly due to the ability to take advantage of existing infrastructure and people are more likely to use environmentally friendly forms of transport due to the proximity of home to work and services. Sustainable Development Sequence Maintenance Matrix (P16) providing a stark visual display of how much more viable the Edge of Cambridge is compared to the other options.

There would also appear to be some doubt of the ability to fund the infrastructure required for new settlements as they are the biggest contributor to an SDSR funding shortfall of £1.3 Billion (Infrastructure Delivery Study Update 2013)  
We may have to accept that if we are to grow Cambridge then the Urban part of the City must spread out. This is the most expedient and cost effective way to expand and ticks all the boxes on the development sequence in a positive way.

Change To Plan: Acknowledge assessment on SDSR and develop on edge of cambridge.  
Develop edge of Cambridge as indicated in as more cost effective and easier to deliver sustainability

Legally Compliant?: Yes

Full Reference: O - 65337 - 17286 - PM/SC/2/C - i, ii, iii, iv

65341 Object

Respondent: Mr Brian Williams [17286] Agent: N/A

Summary: There would also appear to be some doubt of the ability to fund the infrastructure required for new settlements as they are the biggest contributor to an SDSR funding shortfall of £1.3 Billion (Infrastructure Delivery Study Update 2013)  
We may have to accept that if we are to grow Cambridge then the Urban part of the City must spread out. This is the most expedient and cost effective way to expand and ticks all the boxes on the development sequence in a positive way.

Change To Plan: Develop edge of Cambridge as indicated in as more cost effective and easier to deliver sustainability

Legally Compliant?: Yes

Full Reference: O - 65341 - 17286 - PM/SC/2/C - i, ii, iii, iv



## 65430 Object

**Respondent: Pigeon Land & LIH [25320]**

**Agent: CODE Development Planners Ltd (Ms Karen Beech) [25295]**

Summary: 1. The councils' 2012 Green Belt Study appears to have been abandoned, rather than corrected and explained as requested by the inspectors in their 20 May 2015 letter.  
2. The new 2015 LDA Green Belt Study is not robust and has inconsistencies in terms of scoring of sites, subdivision of sites into parcels of land for assessment and double counting which then feeds into inaccuracies and confusion in the SA Addendum Report.  
3. The 2015 Study does not, therefore, identify all land that could be released without undue detriment to the purpose of the Green Belt.

Relevant sections of attached document:

Executive summary  
Section 1 - Introduction - para 1.1 to 1.6  
Section 3 - Green Belt - para 3.1 to 3.10  
Section 4 - Overall Development Strategy - para 4.1 to 4.5  
Section 5 - Sustainability Appraisal - para 5.1 to 5.11  
Section 7 - Conclusions - para 7.1 to 7.6  
Appendix 2 - para 1.1 to 6.11 plus appendices  
Appendix 3 - para 1.1 to 5.6  
Appendix 4 - Executive summary, para 1.1 to 4.3

Change To Plan: The Green Belt Study and SA Addendum Report need to be revisited to ensure that a consistent approach is adopted for the consideration of all reasonable alternative urban edge sites.  
In addition, the balance between weighting given to sustainability and weighting given to the protection of the green belt should be reviewed in order to deliver a sustainable development strategy in accordance with the most sustainable option set out in the councils Housing Strategy Update

Legally Compliant?: Yes

Full Reference: O - 65430 - 25320 - PM/SC/2/C - i, ii, iii, iv

## 65522 Object

**Respondent: Pigeon Land & LIH [25320]**

**Agent: CODE Development Planners Ltd (Ms Karen Beech) [25295]**

Summary: The development strategy and the percentage of development proposed in the second tier of sites in the settlement hierarchy (the edge of Cambridge) continues to be reliant on commitments carried forward from previous local plans.  
There are inconsistencies and inaccuracies in the assessment of the reasonable alternatives; the urban fringe sites, in both the Green Belt Assessment and the SA Addendum Report which has resulted in a skew towards the allocation of new settlements.  
The sustainability balance proposed in seeking to justify the dispersal of development into new settlements in South Cambridgeshire away from the centre of Cambridge is flawed.

Change To Plan: 1. Green Belt Study and SA Addendum Report to be revisited to ensure that a consistent approach is adopted for the consideration of all reasonable alternative urban edge sites.  
2. Balance between weighting given to sustainability and weighting given to the protection of the Green Belt to be reviewed in order to deliver a sustainable development strategy in accordance with the most sustainable option set out in the councils Housing Strategy Update.  
3. Sustainability balance to be reviewed in light of flaws

Legally Compliant?: Yes

Full Reference: O - 65522 - 25320 - PM/SC/2/C - i, ii, iii

## 65559 Object

**Respondent:** Barratt Eastern Counties and the North West Cambridge Consortium of Landowners [17788] **Agent:** BIDWELLS LLP (MISS MARCIA WHITEHEAD) [25328]

Summary: The attached report Review of the Cambridge Inner Green Belt Boundary January 2016 responds to the Cambridge Inner Green Belt Boundary Study prepared in November 2015.

The report concludes that the Study has not properly analysed the capacity of the Green Belt within the North West quadrant of Cambridge to accommodate additional development, indicating a proposed revised boundary.

As such, the approach proposed is:

- \* not positively prepared;
- \* not justified as it is not based on a robust evidence base;
- \* not consistent with National Policy within the National Planning Policy Framework (NPPF) in relation to meeting objectively assessed needs.

See attached - Green Belt

Change To Plan: The Local Plan should be amended to reflect an enlarged allocation of land for development between Histon Road and Huntingdon Road as detailed within the report.

Legally Compliant?: No

Full Reference: O - 65559 - 17788 - PM/SC/2/C - i, ii, iv

## 65688 Object

**Respondent:** Paul Beskeen [22409]

**Agent:** N/A

Summary: The new evidence and Main Modifications fail to properly address the Inspector's' concerns of the original work related to the review of the Inner Green Belt Boundary (2012), in particular the clarity of the Green Belt Review methodology, and the role of the Sustainability Appraisal/Strategic Environmental Assessment (SA/SEA) process.

Change To Plan: Delete the modification

Legally Compliant?: Not Specified

Full Reference: O - 65688 - 22409 - PM/SC/2/C - i, iii, iv

## 65749 Object

**Respondent:** Coalition of Parish Councils (Mr Steve Jones) [25442]

**Agent:** N/A

Summary: Green Belt Review does not explain "why the protection of Green Belt should outweigh all other considerations".

In order to respond to the Inspectors' questions the authors of the review would have needed to assess the cost of the current policy and demonstrate that the benefits of keeping the policy clearly outweigh the costs of doing so by:

- \*adding additional assessment criteria,
- \*assessing the relative of all criteria and areas of Green Belt,
- \*Estimating the cost of Green Belt loss against new settlement creation (cost-benefit analysis),
- \*Analysing the adverse impacts of new settlement creation in terms of transport and infrastructure'.

Paragraphs 17 to 20 of supporting document.

Change To Plan: Amend modification due to reasons set out above.

Legally Compliant?: Not Specified

Full Reference: O - 65749 - 25442 - PM/SC/2/C - i, iii

## 65812 Object

**Respondent: Hardwick Parish Council (Mrs G Stoehr) [1891]**

**Agent: N/A**

Summary: Green Belt Review does not explain "why the protection of Green Belt should outweigh all other considerations".

In order to respond to the Inspectors' questions the authors of the review would have needed to assess the cost of the current policy and demonstrate that the benefits of keeping the policy clearly outweigh the costs of doing so by:  
\*adding additional assessment criteria,  
\*assessing the relative of all criteria and areas of Green Belt,  
\*Estimating the cost of Green Belt loss against new settlement creation (cost-benefit analysis),  
\*Analysing the adverse impacts of new settlement creation in terms of transport and infrastructure'.

Paragraphs 17 to 20 of supporting document.

Change To Plan: Amend modification due to reasons set out above.

Legally Compliant?: Not Specified

Full Reference: O - 65812 - 1891 - PM/SC/2/C - i, iii

## 65819 Object

**Respondent: Caxton Parish Council (Mrs Gail Stoehr) [1153]**

**Agent: N/A**

Summary: Green Belt Review does not explain "why the protection of Green Belt should outweigh all other considerations".

In order to respond to the Inspectors' questions the authors of the review would have needed to assess the cost of the current policy and demonstrate that the benefits of keeping the policy clearly outweigh the costs of doing so by:  
\*adding additional assessment criteria,  
\*assessing the relative of all criteria and areas of Green Belt,  
\*Estimating the cost of Green Belt loss against new settlement creation (cost-benefit analysis),  
\*Analysing the adverse impacts of new settlement creation in terms of transport and infrastructure'.

Paragraphs 17 to 20 of supporting document.

Change To Plan: Amend modification due to reasons set out above.

Legally Compliant?: Not Specified

Full Reference: O - 65819 - 1153 - PM/SC/2/C - i, iii

## 65852 Object

**Respondent: Mr C Meadows [21155]**

**Agent: Carter Jonas LLP (Brian Flynn) [17331]**

Summary: The Inner Green Belt Review did not assess sites on the edge of villages, including Histon. The 2002 Green Belt Study described the area within which the site sits as one where distinct views of the city are scarce or absent. Any potential impact on the surrounding landscape or views could be mitigated by retaining the existing trees at the site boundary in conjunction with additional planting. On this basis we consider that development at the site would have no adverse impact on the compactness or setting of Cambridge, and would not lead to the merging of villages. The assessment of the site contained in the Sustainability Appraisal Addendum Report concluded that in Green Belt terms the site scored as 'Amber' for the impact on Green Belt purposes; most other Green Belt sites scored as 'Red'. In our opinion, the site is a candidate to be released from the Green Belt to meet full development needs.

Change To Plan: We request that the Green Belt boundary should be reassessed around the Rural Centres, including Histon, in conjunction with the delivery of sustainable development and in particular meeting full objectively assessed housing needs. We request that land west of 113 Cottenham Road in Histon is released from the Green Belt and is specifically allocated in Policy H1 and included within the housing trajectory.

Legally Compliant?: Not Specified

Full Reference: O - 65852 - 21155 - PM/SC/2/C - i, iii, iv

65876 Object

Respondent: Waterbeach Parish Council (Liz Jones) [17084]

Agent: N/A

Summary: SCDC failed to take account of SCDC suggesting building on edge of Cambridge will assist in viability and sustainability of new housing as provision of infrastructure less costly due to ability to use existing infrastructure and people are more likely to use environmentally friendly forms of transport due to proximity.

SCDC supports this view, Sustainable Development Sequence Maintenance Matrix (P16) shows how far ahead Edge of Cambridge is compared to other options.

Some doubt of ability to fund infrastructure required for new settlements - biggest contributor to funding shortfall of £1.3 Billion (Infrastructure Delivery Study Update 2013)

If we are to grow Cambridge then Urban part of City must spread out. Most expedient and cost effective way to expand and ticks all boxes on development sequence in positive way.

Change To Plan:

Legally Compliant?: Not Specified

Full Reference: O - 65876 - 17084 - PM/SC/2/C - None

65916 Object

Respondent: The Quay Estate [25458]

Agent: Carter Jonas LLP (Mr Richard Seamark) [15727]

Summary: Exceptional circumstances do exist for Green Belt release to support new jobs and homes.  
The Edge of Cambridge offers greater opportunities for delivering sustainable development than in New Settlements.  
Inner Green Belt Review 2015 fails to consider the relationship between the Green Belt and sustainable development.  
The Sustainability Appraisal Addendum fails to consider the consequences of not meeting housing needs and directing development away from Cambridge to new settlements.  
Alternative development scenarios have not been adequately assessed in terms of calculating the net sustainability benefit of major development on the Edge of Cambridge vs. the anticipated benefits arising from New Settlements.

New settlements result in higher S106/CIL contributions.  
No further safeguarded land has not been put forward (contrary to NPPF 85).

Our site (Appendix A) should be released from the Green Belt to accomodate further housing.

Change To Plan: We request that the Green Belt boundary should be reassessed in conjunction with the delivery of sustainable development, and in particular meeting full objectively assessed housing and employment needs and whether safeguarded land needs to be identified. We request that the Site should be released from the Green Belt, and allocated for development or identified as safeguarded land to meet long term development needs. The issue of safeguarded land has not been properly considered in Draft SCLP or the supporting evidence.

Legally Compliant?: Not Specified

Full Reference: O - 65916 - 25458 - PM/SC/2/C - i, ii, iii, iv

## 66004 Object

**Respondent: Commercial Estates Group [17653]**

**Agent: Nathaniel Lichfield & Partners (Mr Matthew Spry) [20555]**

Summary: Inner Green Belt Review (2015) and updated transport modelling is flawed for reasons in Green Belt and Transport Technical Papers (Appendices 3 and 4).

Scope to accommodate development beyond locations already identified in sustainable locations on edge of City, and in accordance with Councils' own sustainable development sequence more land on edge of City should be identified.

Relevant Attachment

Cambridge South East 1.4 Section 2

3(Green Belt), 4(Transport), 6(SA Review) and 7(Development Prospectus)

CEG does not agree options testing was carried out on an equal basis given the way development on edge of Cambridge was assessed and options which were assumed as basis to test how this could come forward.

Relevant Attachment

Cambridge South East 1.4 Section 2

Appendix 3(Green Belt), 4(Transport), 6(SA Review) and 7(Development Prospectus)

Representation supported by summary document and technical papers, including Development Prospectus (Appendix 7) which sets out proposals for an initial phase of development at Cambridge South East.

Change To Plan: Amend modification

Legally Compliant?: Not Specified

Full Reference: O - 66004 - 17653 - PM/SC/2/C - i, ii, iii, iv

## 66089 Object

**Respondent: Ely Diocesan Board of Finance [3062]**

**Agent: Carter Jonas LLP (Brian Flynn) [17331]**

Summary: Relevant sections of attached document: 15 to 17

The Green Belt has been incorrectly treated as a near absolute constraint, when in fact it is a planning policy tool which can and should be varied to meet development needs. The Inner Green Belt Review 2015 fails to consider the relationship between the Green Belt and sustainable development.

It is contrary to NPPF 85 bullet point 3.

Furthermore, no additional or alternative land has been considered or assessed as potential safeguarded land for housing or employment. Green Belt boundaries will need to be altered again at the end of the plan period it has no permanence and will not endure beyond the plan period.

Change To Plan: We request that the Green Belt boundary should be reassessed in conjunction with the delivery of sustainable development, and in particular meeting full objectively assessed housing and employment needs and whether safeguarded land needs to be identified. We request that all of the EDBF sites should be released from the Green Belt, and allocated for development or identified as safeguarded land to meet long term development needs. The issue of safeguarded land has not been properly considered in Draft SCLP or the supporting evidence.

Legally Compliant?: Not Specified

Full Reference: O - 66089 - 3062 - PM/SC/2/C - i, ii, iii, iv

## 66111 Object

**Respondent: Grosvenor Developments Ltd and USS [25482]**

**Agent: Savills (Mr Colin Campbell) [15804]**

Summary: The Cambridge Inner Green Belt Boundary Study, LDA Design, November, 2015, is not an appropriate evidence base and does not overcome issues identified at the EiP.

As part of reviewing this report, a number of concerns relating to the methodology have been determined that skew the results for sector 7. The assessment of Sector 7 is not appropriate.

Change To Plan: Delete modification

Legally Compliant?: Not Specified

Full Reference: O - 66111 - 25482 - PM/SC/2/C - i, ii, iii

**66126 Object**                      **Respondent: Cambridgeshire County Council - Strategic Assets Team [25478]**                      **Agent: Carter Jonas LLP (Brian Flynn) [17331]**

Summary: Relevant paragraphs of supporting document: 23 to 24

The methodology of the Inner Green Belt Review 2015 which supports this modification is not robust. We consider that addition land in this location could be released from the Green Belt in this location (Sub-Area 11.2).

Change To Plan: The methodology of the Inner Green Belt Review is not robust, and should be tested at a specific Green Belt Matter Session when the LP Examination resumes. We request that the Green Belt boundary should be reassessed in conjunction with the delivery of sustainable development and in particular meeting full objectively assessed housing needs. We request that land to the north of Babraham Road, west of Cherry Hinton Road/Limekiln Road and south of Worts' Causeway is released from the Green Belt and identified as a strategic site allocation.

Legally Compliant?: Not Specified

Full Reference: O - 66126 - 25478 - PM/SC/2/C - i, ii, iii, iv

**66151 Object**                      **Respondent: South Barton Road Land Owners Group [21301]**                      **Agent: Carter Jonas LLP (Brian Flynn) [17331]**

Summary: Relevant sections of attached document: 27 to 30

The Green Belt has been incorrectly treated as a near absolute constraint, when in fact it is a planning policy tool which can and should be varied to meet development needs. The Inner Green Belt Review 2015 fails to consider the relationship between the Green Belt and sustainable development.

It is contrary to NPPF 85 bullet point 3.

The Inner Green Belt Review 2015 is bias towards the issue of setting.

The Inner Green Belt Review 2015 exaggerates the 'unspoilt' nature of the views from the west of Cambridge.

Change To Plan: The methodology of the Inner Green Belt Review is not robust. We request that the Green Belt boundary should be reassessed in conjunction with the delivery of sustainable development, and in particular meeting full objectively assessed housing needs and whether safeguarded land needs to be identified. We request that land South of Barton Road is released from the Green Belt and identified as safeguarded land to meet development needs beyond the plan period.

Legally Compliant?: Not Specified

Full Reference: O - 66151 - 21301 - PM/SC/2/C - i, ii, iii, iv

## 66159 Object

**Respondent: Shelford Investments Ltd [21149]**

**Agent: Carter Jonas LLP (Brian Flynn) [17331]**

Summary: Paragraphs 18 to 19

Land off Cabbage Moor in Great Shelford should have been released for development.

The Inner Green Belt Review did not assess sites on the edge of villages, including Great Shelford.

The site is not part of the wider landscape but is related to the urban area.

The land to the north was previously released from the Green Belt and is currently being developed.

The development would have no adverse impact on the compactness or setting of Cambridge and would not lead to the merging of villages.

Landscape improvements could be undertaken to protect the special character of Cambridge and it's setting.

The assessment of the site contained in the Sustainability Appraisal Addendum Report (Site Ref. SC188) concluded that in Green Belt terms the site scored as 'Amber' for the impact on Green Belt purposes making it a candidate for Green Belt release.

Change To Plan: We request that the Green Belt boundary should be reassessed around the Rural Centres, including Great Shelford, in conjunction with the delivery of sustainable development and in particular meeting full objectively assessed housing needs. We request that land off Cabbage Moor in Great Shelford is released from the Green Belt and is specifically allocated in Policy H1 and included within the housing trajectory.

Legally Compliant?: Not Specified

Full Reference: O - 66159 - 21149 - PM/SC/2/C - i, ii, iii, iv

## 66168 Object

**Respondent: Great Shelford Ten Acres Limited [8948]**

**Agent: Bidwells (Mrs Stacey Rawlings) [3140]**

Summary: We object to the text included at PM/SC/2/C that the study reached the conclusions as stated.

To the contrary, the conclusions of the study state at paragraph 0.6.2:

"a number of areas have been identified around the south and south-east of the city where limited development, if handled appropriately, could take place without significant harm to Green Belt purposes. In each case, parameters are set for any such development to avoid significant harm to the purposes of the Green Belt." This includes our client's land at Great Shelford, off Cambridge Road which is identified as comprising sub area 8.2.

See attached documents:

\* PM\_SC\_2\_C.pdf

\* Critique of the Councils' Sustainability Appraisal.pdf

\* Critique of the Councils' Housing Land Supply.pdf

\* Critique of the Councils' OAN.pdf

Change To Plan: In order to properly reflect the conclusions in respect of the land off Cambridge Road, Great Shelford, we propose that the text should be amended as follows: "In response to issues raised by the Inspectors during the Local Plan Examination, the Councils commissioned a new independent Inner Green Belt Review in 2015. This also concluded that beyond those locations already identified in the submission Local Plans it is unlikely that any further significant development could be accommodated without substantial harm to Green Belt purposes on the edge of Cambridge City. However, some small scale releases may be acceptable subject to specific parameters. (in most locations around the edge of the City). Additional work was carried to consider sites on the edge of Cambridge on an equal basis with other sites, through transport modelling and Sustainability Appraisal."

Legally Compliant?: Not Specified

Full Reference: O - 66168 - 8948 - PM/SC/2/C - iii

**66189 Object**                      **Respondent: Histon & Impington Parish Council (Ms Chelsea Presland) [20953]**                      **Agent: N/A**

Summary: ByPass Farm

In previous submissions HIPC had recorded a willingness of the County Council's Farms Estate to consider leasing the site to the Parish Council for recreation purposes. This offer has now been withdrawn.

HIPC therefore wishes to remove the reclassification of this land as recreation space. It should remain as Green Belt.

Change To Plan:

Legally Compliant?: Not Specified

Full Reference: O - 66189 - 20953 - PM/SC/2/C - None

**66190 Object**                      **Respondent: North Barton Road Land Owners Group [21302]**                      **Agent: Carter Jonas LLP (Brian Flynn) [17331]**

Summary: CSA, on behalf of North BRLOG, has undertaken an assessment of the Inner Green Belt Review 2015, and concludes that:  
-It is bias towards 'setting'  
-Exaggerates the 'unspoilt' nature of the views from the west of Cambridge  
-Assumes that development would occur across North of Barton Road

The Local Plans CSRM Transport Report supports the merits of development on the edge of Cambridge.

The land to the North of Barton Road:  
-Does not require transport measures to generate a high level of trips by walking and cycling.  
-Provides an opportunity to facilitate sections of the radial and orbital routes proposed as City Deal projects.

Relevant attachments:  
-CSa 2025\_05a LDA Green Belt Response.pdf  
-Transport Technical Note - PBA LP Mods and SA  
-5352-L-05 Masterplan (3).pdf  
-North BRLOG LP Mods Jan 2016.pdf : Paragraphs 46 to 52.pdf

Change To Plan: The methodology of the Inner Green Belt Review is not robust, and should be tested at a specific Green Belt Matter Session when the LP Examination process is reopened. We request that the Green Belt boundary should be reassessed in conjunction with the delivery of sustainable development and in particular meeting full objectively assessed housing needs. We request that land North of Barton Road is released from the Green Belt and identified as a strategic site allocation. The Atkins Transport Report does not provide an adequate transport evidence base or data to support the proposed development strategy or to reject sites on the edge of Cambridge. We request that the updated transport evidence is tested when the Matter 7: Transport Hearing Session is reconvened when the LP Examination process is reopened.

Legally Compliant?: Not Specified

Full Reference: O - 66190 - 21302 - PM/SC/2/C - i, ii, iv

**65123 Support**                      **Respondent: Dr Roger Sewell [25099]**                      **Agent: N/A**

Summary: It is vital that the Green Belt is preserved.

Change To Plan:

Legally Compliant?: Not Specified

Full Reference: S - 65123 - 25099 - PM/SC/2/C - None



## 65285 Support

**Respondent:** Rustat Road Neighbourhood Association (Mr Roger Crabtree) [16745] **Agent:** N/A

**Summary:** Green belt preservation is a vital factor for the continued success of the Cambridge sub region. It is one of the key factors in sustaining a good quality of life, which is important both for existing residents and attracting new people to the expanding local job market.

So we strongly support these conclusions about the adverse impact of further incursions into the Green Belt

Change To Plan:

Legally Compliant?: Not Specified

Full Reference: S - 65285 - 16745 - PM/SC/2/C - None

## 65298 Support

**Respondent:** Campaign to Protect Rural England (CPRE) (Miss Shirley Fieldhouse) [17302] **Agent:** N/A

**Summary:** CPRE supports the assessment of the Green Belt carried out by consultants LDA which confirms the need to continue to protect the Green Belt from major incursions.

Change To Plan:

Legally Compliant?: Not Specified

Full Reference: S - 65298 - 17302 - PM/SC/2/C - None

## 65698 Support

**Respondent:** The Taylor Family & Countryside Properties (UK) Ltd [19841] **Agent:** Andrew Martin - Planning Limited (Mr Andrew Martin) [16509]

**Summary:** We support the commission of the new independent Inner Green Belt Review. We agree with the key conclusions that beyond those locations identified in the submitted Local Plans it is unlikely that any development could be accommodated without significant harm to Green Belt purposes.

We acknowledge that this work is supported by additional work undertaken to consider sites on the edge of Cambridge on an equal basis with other sites, through transport modelling and sustainability appraisal. Together this additional work addresses the questions posed by the Inspectors.

Assessments undertaken have demonstrated that the housing requirement for Cambridge City and South Cambridgeshire can be met without the need for Green Belt releases. As such, no exceptional circumstances can be demonstrated and the findings of the latest review are appropriate and consistent with the NPPF.

Change To Plan:

Legally Compliant?: Not Specified

Full Reference: S - 65698 - 19841 - PM/SC/2/C - None

## 65726 Support

**Respondent:** RLW Estates [1284] **Agent:** Boyer Planning (Matthew Clarke) [9069]

**Summary:** RLW Estates supports findings of Inner Green Belt boundary review 2015 and conclusions that beyond existing identified locations it is unlikely any additional development could be accommodated without resulting in substantial harm to Green Belt purposes, with two exceptions, namely a smaller area adjacent to Peterhouse Technology Park could be released from Cambridge Green Belt, and a further opportunity for development on land south of Cambridge Biomedical Campus.

It is noted that confirmation is provided that sites on edge of Cambridge have been considered on equal basis with other sites, in respect of transport modelling and sustainability appraisal assessment work undertaken in response to issues raised by the Inspectors.

Change To Plan:

Legally Compliant?: Not Specified

Full Reference: S - 65726 - 1284 - PM/SC/2/C - None

## 65932 Support

**Respondent:** Cambridge Past Present and Future (Ms Stacey Weiser) [20942] **Agent:** N/A

**Summary:** CambridgePPF raised substantive concerns about the adequacy of the previous inner Green Belt review as a basis for future spatial planning on the grounds that the assessment criteria did not conform to the NPPF, the lack of transparency, and poor consistency in the outcome. The 2015 study effectively answers these concerns. We therefore accept the conclusion that further releases will cause substantial harm to the Green Belt purposes

Change To Plan:

Legally Compliant?: Not Specified

Full Reference: S - 65932 - 20942 - PM/SC/2/C - None

**66125 Support**

**Respondent:** Fulbourn Parish Council (Mr Graham Cone ) [25279]

**Agent:** N/A

Summary: The modifications have given consideration to protecting Fulbourn's green belt keeping Fulbourn a Village in its own right not just an extension of Cambridge City. As a Parish we would like to see this Plan adopted as soon as possible to protect our village and designate it a Minor Rural Centre.

Change To Plan:

Legally Compliant?: Not Specified

Full Reference: S - 66125 - 25279 - PM/SC/2/C - None

**65310 Object**      **Respondent:** Barratt Eastern Counties and the North West Cambridge Consortium of Landowners [17788]      **Agent:** BIDWELLS LLP (MISS MARCIA WHITEHEAD) [25328]

Summary: We object to the Proposed Modifications to Table 2.22 since, despite the proposed changes to the proportion of housing across the development hierarchy, the strategy remains too heavily reliant on development at New Settlements where significant uncertainty exists with regard to deliverability.

The sustainability merits of sites on the edge of Green Belt have not been given sufficient consideration in sustainability terms due to the Councils' approach to the assessment of the Green Belt.

Consequently, Table 2.22 is unsound as it is not:

- \* positively prepared;
- \* justified as it is not based on a robust evidence base;
- \* consistent with National Policy.

Change To Plan: The Proposed Modifications to Table 2.22 should be deleted and the balance of housing across the hierarchy reviewed with more cautious delivery assumptions used for the New Settlements and having regard to a more fundamental Green Belt Review. Any resultant shortfalls in housing supply should then be addressed through further allocations on the Edge of Cambridge and Villages.

It is considered that this revised approach would enable the Council to meet the objectively assessed housing needs for Cambridge in full and boost significantly the supply of housing in accordance with the requirements of Government guidance in the NPPF paragraphs 47 and 159. As such, this will ensure that the Plan is Sound.

Legally Compliant?: No

Full Reference: O - 65310 - 17788 - PM/SC/2/E - i, ii, iv

**65474 Object**      **Respondent:** Bidwells (Miss Marcia Whitehead) [17324]      **Agent:** Bidwells LLP (Alison Barnes) [25318]

Summary: Bidwells object to the Proposed Modifications to Table 2.21 since it is considered that, despite the proposed changes to the proportion of housing provided across the development hierarchy, the resultant strategy remains too heavily reliant on development at New Settlements where significant uncertainty exists with regard to deliverability.

Consequently, it is considered that Table 2.21 is:

- \* not positively prepared;
- \* not justified as it is not based on a robust evidence base;
- \* not consistent with National Policy within the National Planning Policy Framework (NPPF) in relation to meeting objectively assessed needs.

Change To Plan: The Proposed Modifications to Table 2.21 should be deleted and amended with the balance of housing across the hierarchy reviewed with more cautious delivery assumptions used for the New Settlements and having regard to a more fundamental Green Belt Review. Any resultant shortfalls in housing supply should then be addressed through further allocations on the Edge of Cambridge and Villages.

It is considered that this revised approach would enable the Council to meet the objectively assessed housing needs for Cambridge in full and boost significantly the supply of housing in accordance with the requirements of Government guidance in the NPPF paragraphs 47 and 159. As such, this will ensure that the Plan is Sound.

Legally Compliant?: No

Full Reference: O - 65474 - 17324 - PM/SC/2/E - i, ii, iv

65497 Object

Respondent: Hill Residential [25378]

Agent: KWA Architects (Mrs Meghan Bonner) [25377]

Summary: The policy is Unjustified. It is not the most appropriate strategy when considered against reasonable alternatives. The Big City Deal will create 5,200 jobs within five miles of the site.

Increasing the housing allocation on site H1b would represent a sustainable and deliverable approach to address local housing needs The policy is Negatively Prepared.

Housing numbers ignore the most recent and relevant housing data and fail to make best use of the land.

The policy fails to comply with National Planning Policy by falling short of density requirements.

Increasing the housing allocation to 120 on site H1:b could address this.

Change To Plan: An increase in the housing allocation on site H1:b from 80 dwellings to 120 dwellings.

Legally Compliant?: No

Full Reference: O - 65497 - 25378 - PM/SC/2/E - i, ii, iv

65521 Object

Respondent: Endurance Estates Limited [19174]

Agent: Bidwells LLP (Susan Chappell) [25316]

Summary: Endurance Estates object to the Proposed Modifications to Table 2.21 since it is considered that, despite the proposed changes to the proportion of housing provided across the development hierarchy, the resultant strategy remains too heavily reliant on development at New Settlements where significant uncertainty exists with regard to deliverability.

Consequently, it is considered that Table 2.21 is:

- \* not positively prepared;
- \* not justified as it is not based on a robust evidence base;
- \* not consistent with National Policy within the National Planning Policy Framework (NPPF) in relation to meeting objectively assessed needs.

Change To Plan: The Proposed Modifications to Table 2.21 should be deleted and amended with the balance of housing across the hierarchy reviewed with more cautious delivery assumptions used for the New Settlements and having regard to a more fundamental Green Belt Review. Any resultant shortfalls in housing supply should then be addressed through further allocations on the Edge of Cambridge and Villages.

It is considered that this revised approach would enable the Council to meet the objectively assessed housing needs for Cambridge in full and boost significantly the supply of housing in accordance with the requirements of Government guidance in the NPPF paragraphs 47 and 159. As such, this will ensure that the Plan is Sound.

Legally Compliant?: No

Full Reference: O - 65521 - 19174 - PM/SC/2/E - i, ii, iv

## 65526 Object

**Respondent: Pigeon Land & LIH [25320]**

**Agent: CODE Development Planners Ltd (Ms Karen Beech) [25295]**

Summary: The development strategy and the percentage of development proposed in the second tier of sites in the settlement hierarchy (the edge of Cambridge) continues to be reliant on commitments carried forward from previous local plans.  
There are inconsistencies and inaccuracies in the assessment of the reasonable alternatives; the urban fringe sites, in both the Green Belt Assessment and the SA Addendum Report which has resulted in a skew towards the allocation of new settlements.  
The sustainability balance proposed in seeking to justify the dispersal of development into new settlements in South Cambridgeshire away from the centre of Cambridge is flawed.

Relevant documents:160125\_CSTpt.pdf

Executive summary  
Section 1 - Introduction - para 1.1 to 1.6  
Section 3 - Green Belt - para 3.1 to 3.10  
Section 4 - Overall Development Strategy - para 4.1 to 4.5  
Section 5 - Sustainability Appraisal - para 5.1 to 5.11  
Section 7 - Conclusions - para 7.1 to 7.6  
Appendix 2 - para 1.1 to 6.11 plus appendices  
Appendix 3 - para 1.1 to 5.6  
Appendix 4 - Executive summary, para 1.1 to 4.3

Change To Plan: 1. Green Belt Study and SA Addendum Report to be revisited to ensure that a consistent approach is adopted for the consideration of all reasonable alternative urban edge sites.  
2. Balance between weighting given to sustainability and weighting given to the protection of the Green Belt to be reviewed in order to deliver a sustainable development strategy in accordance with the most sustainable option set out in the councils Housing Strategy Update.  
3. Sustainability balance to be reviewed in light of flaws.

Legally Compliant?: Yes

Full Reference: O - 65526 - 25320 - PM/SC/2/E - i, ii, iii

## 65571 Object

**Respondent: Unwins and Biggs [25382]**

**Agent: Bidwells LLP (Alison Barnes) [25318]**

Summary: Unwins and Biggs object to the Proposed Modifications to Table 2.21 since it is considered that, despite the proposed changes to the proportion of housing provided across the development hierarchy, the resultant strategy remains too heavily reliant on development at New Settlements where significant uncertainty exists with regard to deliverability.

Consequently, it is considered that Table 2.21 is:

- \* not positively prepared;
- \* not justified as it is not based on a robust evidence base;
- \* not consistent with National Policy within the National Planning Policy Framework (NPPF) in relation to meeting objectively assessed needs.

Change To Plan: The Proposed Modifications to Table 2.21 should be deleted and amended with the balance of housing across the hierarchy reviewed with more cautious delivery assumptions used for the New Settlements and having regard to a more fundamental Green Belt Review. Any resultant shortfalls in housing supply should then be addressed through further allocations on the Edge of Cambridge and Villages.

It is considered that this revised approach would enable the Council to meet the objectively assessed housing needs for Cambridge in full and boost significantly the supply of housing in accordance with the requirements of Government guidance in the NPPF paragraphs 47 and 159. As such, this will ensure that the Plan is Sound.

Legally Compliant?: No

Full Reference: O - 65571 - 25382 - PM/SC/2/E - i, ii, iv

## 65584 Object

**Respondent: Pembroke College & the Balaam Family [21173]**

**Agent: Bidwells LLP (Susan Chappell) [25316]**

Summary: Pembroke College & the Balaam Family object to the Proposed Modifications to Table 2.21 since it is considered that, despite the proposed changes to the proportion of housing provided across the development hierarchy, the resultant strategy remains too heavily reliant on development at New Settlements where significant uncertainty exists with regard to deliverability.

It is considered that Table 2.21 is:

- \* not positively prepared;
- \* not justified as it is not based on a robust evidence base;
- \* not consistent with National Policy within the National Planning Policy Framework (NPPF) in relation to meeting objectively assessed needs.

Change To Plan: The Proposed Modifications to Table 2.21 should be deleted and amended with the balance of housing across the hierarchy reviewed with more cautious delivery assumptions used for the New Settlements and having regard to a more fundamental Green Belt Review. Any resultant shortfalls in housing supply should then be addressed through further allocations on the Edge of Cambridge and Villages.

It is considered that this revised approach would enable the Council to meet the objectively assessed housing needs for Cambridge in full and boost significantly the supply of housing in accordance with the requirements of Government guidance in the NPPF paragraphs 47 and 159. As such, this will ensure that the Plan is Sound.

Legally Compliant?: No

Full Reference: O - 65584 - 21173 - PM/SC/2/E - None

## 65810 Object

**Respondent: The Taylor Family & Countryside Properties (UK) Ltd [19841]**

**Agent: Andrew Martin - Planning Limited (Mr Andrew Martin) [16509]**

Summary: The figure of 4,370 homes to be provided on new sites in the plan period is proposed to be removed by modification PM/SC/2/Q. This is to ensure consistency with Policy S/6 and the removal of restrictions on start dates and annual rates of completions. We therefore query the proposed revised figure of 4,610 that has been inserted in its place. The table should be struck out.

Change To Plan: Amend modification.

Legally Compliant?: Not Specified

Full Reference: O - 65810 - 19841 - PM/SC/2/E - ii

## 65990 Object

**Respondent: Scott Properties [25474]**

**Agent: Barton Willmore (Lauren Dooley) [25473]**

Summary: Housing Land Supply: Two recent appeals in South Cambridgeshire concluded that the Council could only demonstrate either 3.5 years or 3.9 years depending on whether housing supply was calculated using the Sedgefield or Liverpool method. The further work carried out on Objectively Assessed Need by PBA has a minimal impact on the Council's position. The Council's current claimed position as set out in the November 2015 Housing Land Supply Paper suggest that they can demonstrate a five year housing land supply under only one scenario (Liverpool with 5% buffer - 5.1 years). This provides a strong indication that additional housing is required to meet OAN.

Change To Plan:

Legally Compliant?: Not Specified

Full Reference: O - 65990 - 25474 - PM/SC/2/E - None

## 66005 Object

**Respondent: Commercial Estates Group [17653]**

**Agent: Nathaniel Lichfield & Partners (Mr Matthew Spry) [20555]**

Summary: CEG maintains that the Objectively Assessed Housing Need (OAHN) for the HMA is greater than the Councils propose, and in particular the need in Cambridge City is greater than the 14,000 homes provided by the draft Cambridge Local Plan.

This representation is supported by a range of technical papers which form part of and support this representation, including a Technical Paper on OAHN (CEG Representation Appendix 2). This Paper provides a critique of the latest PBA assessment and sets out the reasons why the OAHN must be increased to 41,000 new homes if the jobs target of 44,000 is to be met.

Relevant Attachment  
Cambridge South East 1.4 Section 2(a)-OAHN(2.2-2.13)  
Appendix 2(OAHN)

Change To Plan: Amend modification

Legally Compliant?: Not Specified

Full Reference: O - 66005 - 17653 - PM/SC/2/E - i, ii, iii, iv

## 66051 Object

**Respondent: Laragh Homes [25312]**

**Agent: Strutt & Parker LLP (Mr Jon Jennings) [25077]**

Summary: NPPF not only requires Local Planning Authorities to boost significantly the supply of housing (para 2.7) but also requires local authorities to ensure choice and competition in the market for land. Furthermore, the NPPF requires LPAs to 'identify a supply of specific, developable sites or broad locations for growth for 6-10 years and, where possible, for years 11-15'. Therefore, the modifications should take the opportunity to allocate a wider range of developable sites in sustainable locations such as Swavesey to ensure that there are sufficient sites to maintain a 5 year supply of housing land over the plan period whilst maintaining competition in the market for land.

Change To Plan: Delete and amend modification

Legally Compliant?: Not Specified

Full Reference: O - 66051 - 25312 - PM/SC/2/E - i, ii, iii, iv

## 66054 Object

**Respondent: Laragh Homes [25312]**

**Agent: Strutt & Parker LLP (Mr Jon Jennings) [25077]**

Summary: At para 2.20 of the Council's response to the Inspectors' letter, there is a heavy reliance on site comparisons, rather than a deeper consideration of alternative sites. Additionally, new settlements take time to come forward and are heavily reliant on provision of infrastructure from the outset. The plans strategy should therefore be modified to identify more small sites in sustainable locations to reduce the risks with new settlements and address the Inspectors' concerns about the development strategy.

Change To Plan: Delete and amend modification

Legally Compliant?: Not Specified

Full Reference: O - 66054 - 25312 - PM/SC/2/E - i, ii, iii, iv

## 66181 Object

**Respondent: Great Shelford Ten Acres Limited [8948]**

**Agent: Bidwells (Mrs Stacey Rawlings) [3140]**

Summary: Delivery on New Settlements may take a long time to come forward and this should be reflected in table 2.21 as housing supply will be affected. Sites on the Edge of Cambridge have not been given significant consideration in sustainability terms due to the Council's approach to the assessment of villages the within the Green Belt.  
It is considered that the more sustainable villages within the District continue to have a further role to play in meeting the District's future housing needs.

See attached documents:

\* Table 2.21.pdf

\* Critique of the Councils' Sustainability Appraisal.pdf

\* Critique of the Councils' Housing Land Supply.pdf

Change To Plan: The Proposed Modifications to Table 2.21 should be deleted and amended with the balance of housing across the hierarchy reviewed with more cautious delivery assumptions used for the New Settlements and having regard to a more fundamental Green Belt Review. Any resultant shortfalls in housing supply should then be addressed through further allocations on the Edge of Cambridge and more sustainable villages.  
It is considered that this revised approach would enable the Council to meet the objectively assessed housing needs for Cambridge in full and boost significantly the supply of housing in accordance with the requirements of Government guidance in the NPPF paragraphs 47 and 159. As such, this will ensure that the Plan is Sound.

Legally Compliant?: Not Specified

Full Reference: O - 66181 - 8948 - PM/SC/2/E - i, ii, iii, iv

## 66212 Object

**Respondent: North Barton Road Land Owners Group [21302]**

**Agent: Carter Jonas LLP (Brian Flynn) [17331]**

Summary: SCDC's predictions of housing completions will be accurate; historic monitoring data demonstrates lower than predicted completion rates. There is a consistent history that less housing is actually delivered than is predicted to be delivered.  
The undersupply position is worsening year on year.  
The Council's housing trajectory should be treated with caution and is highly likely to be overly optimistic.

Relevant attachments:

-Jan Representations OAN (25.01.16).pdf

-Table South Cambridgeshire Housing Predictions Recorded Completions.pdf

-North BRLOG LP Mods Jan 2016.pdf : Paragraphs 55 to 56.pdf

Change To Plan: We request that all references to a joint housing trajectory are deleted from Draft SCLP. We request that a more robust assessment of the sites is undertaken and the housing trajectory is adjusted accordingly.

Legally Compliant?: Not Specified

Full Reference: O - 66212 - 21302 - PM/SC/2/E - i, ii, iv

## 65286 Support

**Respondent: Rustat Road Neighbourhood Association (Mr Roger Crabtree) [16745]**

**Agent: N/A**

Summary: We are comfortable with these revised numbers.

Change To Plan:

Legally Compliant?: Not Specified

Full Reference: S - 65286 - 16745 - PM/SC/2/E - None



65727 Support

Respondent: RLW Estates [1284]

Agent: Boyer Planning (Matthew Clarke) [9069]

Summary: Support increased number of dwellings identified for delivery at new settlements / Cambourne West in form of new sites within plan period. Relies on cautious assumptions regarding delivery at Waterbeach - rates could be higher (previous representations). Preparation of Development Framework will facilitate submission of early phase planning applications.

Proportion of dwellings at new settlements / West Cambourne reduced. Concern overall quantum and relative proportion of homes within rural area has increased considerably. Results from existing completions and commitments rather than new allocations. More likely to be reflection of speculative applications in the absence of 5 year housing land supply, underlining importance of progressing plans towards adoption at earliest opportunity.

Change To Plan:

Legally Compliant?: Not Specified

Full Reference: S - 65727 - 1284 - PM/SC/2/E - None

66128 Support

Respondent: Mr Brian Tyler [16437]

Agent: Bidwells (Steven Butler) [25483]

Summary: The Council should use every opportunity under this modification to provide for a proportion of the additional 500 units identified through the most-up-to-date OAHN forecasts through dispersal to sites in rural locations, particularly on windfall brownfield sites. Such an approach would reduce risk of non-delivery of the Plan because it would go some way towards reducing reliance on new settlement options as a way of maintaining the housing land supply. Furthermore appropriate scale development on immediately available brownfield sites in locations such as the land west of Church Street, Whaddon can be delivered in the short term, in accordance with the Council's wider strategic objectives.

Change To Plan:

Legally Compliant?: Not Specified

Full Reference: S - 66128 - 16437 - PM/SC/2/E - None

**65770 Object**                      **Respondent: Pigeon Land & LIH [25320]**                      **Agent: CODE Development Planners Ltd (Ms Karen Beech) [25295]**

Summary: The development strategy and the percentage of development proposed in the second tier of sites in the settlement hierarchy (the edge of Cambridge) continues to be reliant on commitments carried forward from previous local plans.  
There are inconsistencies and inaccuracies in the assessment of the reasonable alternatives; the urban fringe sites, in both the Green Belt Assessment and the SA Addendum Report which has resulted in a skew towards the allocation of new settlements.  
The sustainability balance proposed in seeking to justify the dispersal of development into new settlements in South Cambridgeshire away from the centre of Cambridge is flawed.

Relevant documents:160125\_CSTpt.pdf

Executive summary  
Section 1 - Introduction - para 1.1 to 1.6  
Section 3 - Green Belt - para 3.1 to 3.10  
Section 4 - Overall Development Strategy - para 4.1 to 4.5  
Section 5 - Sustainability Appraisal - para 5.1 to 5.11  
Section 7 - Conclusions - para 7.1 to 7.6  
Appendix 2 - para 1.1 to 6.11 plus appendices  
Appendix 3 - para 1.1 to 5.6  
Appendix 4 - Executive summary, para 1.1 to 4.3

Change To Plan: 1. Green Belt Study and SA Addendum Report to be revisited to ensure that a consistent approach is adopted for the consideration of all reasonable alternative urban edge sites.  
2. Balance between weighting given to sustainability and weighting given to the protection of the Green Belt to be reviewed in order to deliver a sustainable development strategy in accordance with the most sustainable option set out in the councils Housing Strategy Update.  
3. Sustainability balance to be reviewed in light of flaws.

Legally Compliant?: Yes

Full Reference: O - 65770 - 25320 - PM/SC/2/F - i, ii, iii

**65849 Object**                      **Respondent: Bidwells (Miss Marcia Whitehead) [17324]**                      **Agent: N/A**

Summary: Bidwells object to the Proposed Modifications to Table 2.22 since, despite the proposed changes to the proportion of housing across the development hierarchy, the strategy remains too heavily reliant on development at New Settlements where significant uncertainty exists with regard to deliverability.  
The sustainability merits of sites on the edge of Green Belt have not been given sufficient consideration in sustainability terms due to the Councils' approach to the assessment of the Green Belt.  
Consequently, Table 2.22 is unsound

Change To Plan: The Proposed Modifications to Table 2.22 should be deleted and amended with the balance of housing across the hierarchy reviewed with more cautious delivery assumptions used for the New Settlements and having regard to a more fundamental Green Belt Review. Any resultant shortfalls in housing supply should then be addressed through further allocations on the Edge of Cambridge and Villages.  
It is considered that this revised approach would enable the Council to meet the objectively assessed housing needs for Cambridge in full and boost significantly the supply of housing in accordance with the requirements of Government guidance in the NPPF paragraphs 47 and 159. As such, this will ensure that the Plan is Sound.

Legally Compliant?: Not Specified

Full Reference: O - 65849 - 17324 - PM/SC/2/F - i, ii, iv

65862 Object

Respondent: Endurance Estates Limited [19174]

Agent: Bidwells LLP (Alison Barnes) [25318]

Summary: Endurance Estates Limited object to the Proposed Modifications to Table 2.22 since, despite the proposed changes to the proportion of housing across the development hierarchy, the strategy remains too heavily reliant on development at New Settlements where significant uncertainty exists with regard to deliverability.

The sustainability merits of sites on the edge of Green Belt have not been given sufficient consideration in sustainability terms due to the Councils' approach to the assessment of the Green Belt.

Consequently, Table 2.22 is unsound as it is not:

- \* positively prepared;
- \* justified as it is not based on a robust evidence base;
- \* consistent with National Policy.

Change To Plan: The Proposed Modifications to Table 2.22 should be deleted and amended with the balance of housing across the hierarchy reviewed with more cautious delivery assumptions used for the New Settlements and having regard to a more fundamental Green Belt Review. Any resultant shortfalls in housing supply should then be addressed through further allocations on the Edge of Cambridge and Villages.

It is considered that this revised approach would enable the Council to meet the objectively assessed housing needs for Cambridge in full and boost significantly the supply of housing in accordance with the requirements of Government guidance in the NPPF paragraphs 47 and 159. As such, this will ensure that the Plan is Sound.

Legally Compliant?: Not Specified

Full Reference: O - 65862 - 19174 - PM/SC/2/F - i, ii, iv

65872 Object

Respondent: Unwins and Biggs [25382]

Agent: Bidwells LLP (Alison Barnes) [25318]

Summary: Unwins and Biggs object to the Proposed Modifications to Table 2.22 since, despite the proposed changes to the proportion of housing across the development hierarchy, the strategy remains too heavily reliant on development at New Settlements where significant uncertainty exists with regard to deliverability.

The sustainability merits of sites on the edge of Green Belt have not been given sufficient consideration in sustainability terms due to the Councils' approach to the assessment of the Green Belt.

Consequently, Table 2.22 is unsound as it is not:

- \* positively prepared;
- \* justified as it is not based on a robust evidence base;
- \* consistent with National Policy.

Change To Plan: The Proposed Modifications to Table 2.22 should be deleted and amended with the balance of housing across the hierarchy reviewed with more cautious delivery assumptions used for the New Settlements and having regard to a more fundamental Green Belt Review. Any resultant shortfalls in housing supply should then be addressed through further allocations on the Edge of Cambridge and Villages.

It is considered that this revised approach would enable the Council to meet the objectively assessed housing needs for Cambridge in full and boost significantly the supply of housing in accordance with the requirements of Government guidance in the NPPF paragraphs 47 and 159. As such, this will ensure that the Plan is Sound.

Legally Compliant?: Not Specified

Full Reference: O - 65872 - 25382 - PM/SC/2/F - i, ii, iv

## 65874 Object

**Respondent: Pembroke College & the Balaam Family [21173]**

**Agent: Bidwells LLP (Alison Barnes) [25318]**

Summary: Pembroke College & The Balaam Family object to Proposed Modifications to Table 2.22 since, despite proposed changes to proportion of housing across development hierarchy, strategy remains too heavily reliant on development at New Settlements where significant uncertainty exists with regard to deliverability.

The sustainability merits of sites on the edge of Green Belt have not been given sufficient consideration in sustainability terms due to the Councils' approach to the assessment of the Green Belt.

Consequently, Table 2.22 is unsound as it is not:

- \* positively prepared;
- \* justified as it is not based on a robust evidence base;
- \* consistent with National Policy.

Change To Plan: The Proposed Modifications to Table 2.22 should be deleted and amended with the balance of housing across the hierarchy reviewed with more cautious delivery assumptions used for the New Settlements and having regard to a more fundamental Green Belt Review. Any resultant shortfalls in housing supply should then be addressed through further allocations on the Edge of Cambridge and Villages.

It is considered that this revised approach would enable the Council to meet the objectively assessed housing needs for Cambridge in full and boost significantly the supply of housing in accordance with the requirements of Government guidance in the NPPF paragraphs 47 and 159. As such, this will ensure that the Plan is Sound.

Legally Compliant?: Not Specified

Full Reference: O - 65874 - 21173 - PM/SC/2/F - i, ii, iv

## 66006 Object

**Respondent: Commercial Estates Group [17653]**

**Agent: Nathaniel Lichfield & Partners (Mr Matthew Spry) [20555]**

Summary: CEG maintains that the Objectively Assessed Housing Need (OAHN) for the HMA is greater than the Councils propose, and in particular the need in Cambridge City is greater than the 14,000 homes provided by the draft Cambridge Local Plan.

This representation is supported by a range of technical papers which form part of and support this representation, including a Technical Paper on OAHN (CEG Representation Appendix 2). This Paper provides a critique of the latest PBA assessment and sets out the reasons why the OAHN must be increased to 41,000 new homes if the jobs target of 44,000 is to be met.

Relevant Attachment  
Cambridge South East 1.4 Section 2(a)-OAHN (2.2-2.13)  
Appendix 2(OAHN)

Change To Plan: Amend modification

Legally Compliant?: Not Specified

Full Reference: O - 66006 - 17653 - PM/SC/2/F - i, ii, iii, iv

## 66052 Object

**Respondent: Laragh Homes [25312]**

**Agent: Strutt & Parker LLP (Mr Jon Jennings) [25077]**

Summary: NPPF not only requires Local Planning Authorities to boost significantly the supply of housing (para 2.7) but also requires local authorities to ensure choice and competition in the market for land. Furthermore, the NPPF requires LPAs to 'identify a supply of specific, developable sites or broad locations for growth for 6-10 years and, where possible, for years 11-15'. Therefore, the modifications should take the opportunity to allocate a wider range of developable sites in sustainable locations such as Swavesey to ensure that there are sufficient sites to maintain a 5 year supply of housing land over the plan period whilst maintaining competition in the market for land.

Change To Plan: Delete and amend modification

Legally Compliant?: Not Specified

Full Reference: O - 66052 - 25312 - PM/SC/2/F - i, ii, iii, iv

## 66055 Object

**Respondent:** Laragh Homes [25312]

**Agent:** Strutt & Parker LLP (Mr Jon Jennings) [25077]

**Summary:** At para 2.20 of the Council's response to the Inspectors' letter, there is a heavy reliance on site comparisons, rather than a deeper consideration of alternative sites. Additionally, new settlements take time to come forward and are heavily reliant on provision of infrastructure from the outset. The plans strategy should therefore be modified to identify more small sites in sustainable locations to reduce the risks with new settlements and address the Inspectors' concerns about the development strategy.

**Change To Plan:** Delete and amend modification

**Legally Compliant?:** Not Specified

**Full Reference:** O - 66055 - 25312 - PM/SC/2/F - i, ii, iii, iv

## 66198 Object

**Respondent:** Great Shelford Ten Acres Limited [8948]

**Agent:** Bidwells (Mrs Stacey Rawlings) [3140]

**Summary:** We object to the Proposed Modifications to Table 2.22 since, despite the proposed changes to the proportion of housing across the development hierarchy, the strategy remains too heavily reliant on development at New Settlements where significant uncertainty exists with regard to deliverability. The sustainability merits of sites on the edge of Green Belt have not been given sufficient consideration in sustainability terms due to the Councils' approach to the assessment of the Green Belt.

**See attached documents:**

\* Table2.21.pdf

\* Table 2.22

\* Critique of the Councils' Sustainability Appraisal.pdf

\* Critique of the Councils' Housing Land Supply.pdf

**Change To Plan:** The Proposed Modifications to Table 2.22 should be deleted and replaced with the balance of housing across the hierarchy reviewed with more cautious delivery assumptions used for the New Settlements and having regard to a more fundamental Green Belt Review. Any resultant shortfalls in housing supply should be addressed through further allocations on the Edge of Cambridge and Villages. This revised approach would enable the Council to meet the objectively assessed housing needs for Cambridge in full and boost significantly the supply of housing in accordance with the NPPF. As such, this will ensure that the Plan is Sound.

**Legally Compliant?:** Not Specified

**Full Reference:** O - 66198 - 8948 - PM/SC/2/F - i, ii, iii, iv

## 66213 Object

**Respondent:** North Barton Road Land Owners Group [21302]

**Agent:** Carter Jonas LLP (Brian Flynn) [17331]

**Summary:** SCDC's predictions of housing completions will be accurate; historic monitoring data demonstrates lower than predicted completion rates. There is a consistent history that less housing is actually delivered than is predicted to be delivered. The undersupply position is worsening year on year. The Council's housing trajectory should be treated with caution and is highly likely to be overly optimistic.

**Relevant attachments:**

-Jan Representations OAN (25.01.16).pdf

-Table South Cambridgeshire Housing Predictions Recorded Completions.pdf

-North BRLOG LP Mods Jan 2016.pdf : Paragraphs 57 to 58.pdf

**Change To Plan:** We request that all references to a joint housing trajectory are deleted from Draft SCLP. We request that a more robust assessment of the sites is undertaken and the housing trajectory is adjusted accordingly.

**Legally Compliant?:** Not Specified

**Full Reference:** O - 66213 - 21302 - PM/SC/2/F - i, ii, iv

65729 Support

Respondent: RLW Estates [1284]

Agent: Boyer Planning (Matthew Clarke) [9069]

Summary: Note revisions to table are consistent with Para 2.21 (PM/SC/2/E) and same comments and concerns apply. Noted that table provides comparison with previous proportions at each level of development sequence from Structure Plan. It is evident the greatest shift has been between new settlements and villages. This is not necessarily positive, albeit underlying reasons are acknowledged. In comparison with Structure Plan led distribution, shift remains positive, with reduction in levels within villages (rural area). Increase in proportions at new settlements remains appropriate in principle given limited additional capacity within Cambridge Urban Area, and finite capacity of unconstrained sites within Cambridge Fringe (albeit this has seen increase).

Change To Plan:

Legally Compliant?: Not Specified

Full Reference: S - 65729 - 1284 - PM/SC/2/F - None

**Agent:** N/A

Full Reference: O - 65299 - 17302 - PM/SC/2/G - None

**Agent:** N/A

Full Reference: O - 65338 - 17286 - PM/SC/2/G - i, ii, iii, iv

**Agent:** N/A

Full Reference: O - 65340 - 17286 - PM/SC/2/G - i, ii, iii, iv

**Agent:** N/A

Full Reference: O - 65363 - 5312 - PM/SC/2/G - ii, iv

**65393 Object**

**Respondent:** Campaign to Protect Rural England (CPRE) (Miss Shirley Fieldhouse) [17302] **Agent:** N/A

Summary: Object While CPRE supports the LDA findings on the Green Belt which suggest a smaller extension of Peterhouse Technology Park than originally put forward, we object to the extension to the Biomedical Campus because we feel the land should be safeguarded and not allocated.

Change To Plan: Amend to safeguarded.

Legally Compliant?: Yes

Full Reference: O - 65393 - 17302 - PM/SC/2/G - ii

**65399 Object**

**Respondent:** Scotsdales Garden Centre [17686] **Agent:** Bidwells (Mr Neil Waterson) [5661]

Summary: The Independent Green Belt Review 2015 is flawed and fails to provide a detailed assessment of the Inner Boundary of the Green Belt.

The study adopts a high level approach, assessing the importance of large sectors in a generic manner. It fails to provide a fine grained assessment of individual land parcels and their continued value in meeting Green Belt purposes.

Sector 9.1 fails to give any consideration to Scotsdales Garden Centre. The site does not contribute to Green Belt purposes listed in paragraph 80 of the NPPF and should be removed from the Green Belt.

Change To Plan: A more fine-grained assessment of the Inner Green Belt Study should be undertaken and the Scotsdales site should be removed from the Green Belt.

Legally Compliant?: Yes

Full Reference: O - 65399 - 17686 - PM/SC/2/G - i, ii, iv

**65409 Object**

**Respondent:** David Blake [25352] **Agent:** N/A

Summary: Building on land within 30 metres of a nature reserve is unsustainable.

Change To Plan: This modification to the plan should be deleted in its entirety, and all additional modifications relevant to this location should also be removed (e.g. PM/SC/2/P, PM/SC/8/A, PM/SC/8/B, PM/SC/3/F).

Legally Compliant?: No

Full Reference: O - 65409 - 25352 - PM/SC/2/G - ii

**65431 Object**

**Respondent:** Pigeon Land & LIH [25320] **Agent:** CODE Development Planners Ltd (Ms Karen Beech) [25295]

Summary: 1. The councils' 2012 Green Belt Study appears to have been abandoned, rather than corrected and explained as requested by the inspectors in their 20 May 2015 letter.  
2. The new 2015 LDA Green Belt Study is not robust and has inconsistencies in terms of scoring of sites, subdivision of sites into parcels of land for assessment and double counting which then feeds into inaccuracies and confusion in the SA Addendum Report.  
3. The 2015 Study does not, therefore, identify all land that could be released without undue detriment to the purpose of the Green Belt.

Relevant sections of attached document:

Executive summary

Section 1 - Introduction - para 1.1 to 1.6

Section 3 - Green Belt - para 3.1 to 3.10

Section 7 - Conclusions - para 7.1 to 7.6

Appendix 2 - para 1.1 to 6.11 plus appendices

Change To Plan: The Green Belt Study and SA Addendum Report need to be revisited to ensure that a consistent approach is adopted for the consideration of all reasonable alternative urban edge sites.

In addition, the balance between weighting given to sustainability and weighting given to the protection of the green belt should be reviewed in order to deliver a sustainable development strategy in accordance with the most sustainable option set out in the councils Housing Strategy Update

Legally Compliant?: Yes

Full Reference: O - 65431 - 25320 - PM/SC/2/G - ii, iii, iv



## 65498 Object

**Respondent:** Hill Residential [25378]

**Agent:** KWA Architects (Mrs Meghan Bonner) [25377]

**Summary:** The policy is unjustified as it doesn't represent the most appropriate strategy when considered against reasonable alternatives. Increasing the housing allocation in Sawston, in particular on site H1b to 120 would represent a sustainable and deliverable approach to dealing with the additional housing needs in this part of the district in light of the emerging Big City Deal which will see 5,200 jobs created within five miles of the site.

**Change To Plan:** An increase in the housing allocation on site H1:b from 80 dwellings to 120 dwellings.

**Legally Compliant?:** No

**Full Reference:** O - 65498 - 25378 - PM/SC/2/G - ii

## 65536 Object

**Respondent:** Great Shelford Parish Council (Mrs Bridget Hodge) [12740]

**Agent:** N/A

**Summary:** Great Shelford Parish Council objects to the proposed modification as we believe developing the site would harm the significant amenity and conservation value of the Green Belt at this particular location.

**Change To Plan:** Gt Shelford P.C. believe the site should be part of a landscape enhancement scheme increasing the amenity area around Nine Wells as proposed by the village in our Village Design Statement.

**Legally Compliant?:** Yes

**Full Reference:** O - 65536 - 12740 - PM/SC/2/G - ii

## 65552 Object

**Respondent:** Barratt Eastern Counties and the North West Cambridge Consortium of Landowners [17788] **Agent:** BIDWELLS LLP (MISS MARCIA WHITEHEAD) [25328]

**Summary:** The attached report Review of the Cambridge Inner Green Belt Boundary January 2016 responds to the Cambridge Inner Green Belt Boundary Study prepared in November 2015.

The report concludes that the Study has not properly analysed the capacity of the Green Belt within the North West quadrant of Cambridge to accommodate additional development, indicating a proposed revised boundary.

As such, the approach proposed is:

- \* not positively prepared;
- \* not justified as it is not based on a robust evidence base;
- \* not consistent with National Policy within the National Planning Policy Framework (NPPF) in relation to meeting objectively assessed needs.

See attached - Green Belt

**Change To Plan:** The Local Plan should be amended to reflect an enlarged allocation of land for development between Histon Road and Huntingdon Road as detailed within the report.

**Legally Compliant?:** No

**Full Reference:** O - 65552 - 17788 - PM/SC/2/G - i, ii, iv

65717 Object

Respondent: Mr Jeremy Jones [25348] Agent: N/A

Summary: Inner Green Belt Review 2015, sector 10 includes Nine Wells LNR. In addition to its ecological importance, it has important heritage associations. Sector 10 enhances 'the setting of Cambridge' and 'retains a rural character to the south'. The sector 'plays a key role in the setting of the south of Cambridge' and 'prevents the continued sprawl of Cambridge to the south'.

No justification can be made for the further release of Green Belt land in this sector, especially given the proximity to the Nine Wells LNR, which would clearly be impacted by nearby development.

There is no essential need for further buildings here - they could quite easily exist in any other business park around the city.

If this release is permitted, it could pave the way for further releases to deliver the Addenbrooke's railway station that has long been mooted.

Change To Plan: This modification to the plan should be deleted in its entirety, and all additional modifications relevant to this location should also be removed (e.g. PM/SC/2/P, PM/SC/8/A, PM/SC/8/B, PM/SC/3/F).

Legally Compliant?: Not Specified

Full Reference: O - 65717 - 25348 - PM/SC/2/G - ii, iv

65764 Object

Respondent: Mr Leonard Rix [25445] Agent: N/A

Summary: The Inner Green Belt Review 2015 includes Nine Wells (part of Sector 10) in 'areas enriching the setting of Cambridge'. This ecological important woodland has important heritage associations as historic source of clean water. Report states Sector 10 enhances setting of Cambridge and gives a rural setting to the South whilst new developments in the North create sense of encroachment into the countryside.

The field involved surveyed twice by a local expert was found to contain an abundance of birdlife, including red-listed species. No justification has been made for further release of Green Belt land in this sector, which will make no contribution whatsoever to city's housing needs.

Change To Plan: This modification to the plan should be deleted in its entirety, and all additional modifications relevant to this location should also be removed (e.g. PM/SC/2/P, PM/SC/8/A, PM/SC/8/B, PM/SC/3/F).

Legally Compliant?: Not Specified

Full Reference: O - 65764 - 25445 - PM/SC/2/G - ii, iv

65877 Object

Respondent: Waterbeach Parish Council (Liz Jones) [17084] Agent: N/A

Summary: SCDC failed to take account of SCDR suggesting building on edge of Cambridge will assist in viability and sustainability of new housing as provision of infrastructure less costly due to ability to use existing infrastructure and people are more likely to use environmentally friendly forms of transport due to proximity.

SCDR supports this view, Sustainable Development Sequence Maintenance Matrix (P16) shows how far ahead Edge of Cambridge is compared to other options.

Some doubt of ability to fund infrastructure required for new settlements - biggest contributor to funding shortfall of £1.3 Billion (Infrastructure Delivery Study Update 2013)

If we are to grow Cambridge then Urban part of City must spread out. Most expedient and cost effective way to expand and ticks all boxes on development sequence in positive way.

Change To Plan:

Legally Compliant?: Not Specified

Full Reference: O - 65877 - 17084 - PM/SC/2/G - None

## 65917 Object

**Respondent: The Quay Estate [25458]**

**Agent: Carter Jonas LLP (Mr Richard Seamark) [15727]**

Summary: Exceptional circumstances do exist for Green Belt release to support new jobs and homes.  
The Edge of Cambridge offers greater opportunities for delivering sustainable development than in New Settlements.  
Inner Green Belt Review 2015 fails to consider the relationship between the Green Belt and sustainable development.  
The Sustainability Appraisal Addendum fails to consider the consequences of not meeting housing needs and directing development away from Cambridge to new settlements.  
Alternative development scenarios have not been adequately assessed in terms of calculating the net sustainability benefit of major development on the Edge of Cambridge vs. the anticipated benefits arising from New Settlements.

New settlements result in higher S106/CIL contributions.  
No further safeguarded land has not been put forward (contrary to NPPF 85).

Our site (Appendix A) should be released from the Green Belt to accomodate further housing.

Change To Plan: We request that the Green Belt boundary should be reassessed in conjunction with the delivery of sustainable development, and in particular meeting full objectively assessed housing and employment needs and whether safeguarded land needs to be identified. We request that the Site should be released from the Green Belt, and allocated for development or identified as safeguarded land to meet long term development needs. The issue of safeguarded land has not been properly considered in Draft SCLP or the supporting evidence.

Legally Compliant?: Not Specified

Full Reference: O - 65917 - 25458 - PM/SC/2/G - i, ii, iii, iv

## 65991 Object

**Respondent: Scott Properties [25474]**

**Agent: Barton Willmore (Lauren Dooley) [25473]**

Summary: Green Belt: A Green Belt review has been carried out but this is restricted to inner Cambridge City. We would argue that a full Green Belt Study covering both South Cambridgeshire and Cambridge City is required to assess whether additional Green Belt land can be released in the more sustainable rural centres.

By carrying out a full Green Belt review, this would identify appropriate sites for Green Belt release in the remainder of the district. For instance, the site detailed in the attached Stage 1 Masterplan Framework and Vision Document ought to be considered through such review.

Change To Plan:

Legally Compliant?: Not Specified

Full Reference: O - 65991 - 25474 - PM/SC/2/G - None

## 66007 Object

**Respondent: Commercial Estates Group [17653]**

**Agent: Nathaniel Lichfield & Partners (Mr Matthew Spry) [20555]**

Summary: For the reasons set out in detail in Green Belt Review Technical Paper (Appendix 3) which accompanies this representation and forms part of it, the conclusion in relation to land east of Peterhouse Technology Park (E/2) and proposed alteration to allocation are fundamentally flawed.

As a minimum, proposed allocation E/2 must be reinstated to its original extent and this modification to text amended accordingly.

In relation to both E/2 and provisional new release south of Biomedical Campus, CEG object to Council's approach to defining boundaries which fails to provide clear and recognisable boundaries based on readily recognisable physical features which are likely to be permanent (NPPF para 85).

Representation is supported by range of technical papers which form part of and support this representation.

Relevant Attachment  
Cambridge South East 1.4 Section 2, Section 3  
Appendix 3(Green Belt)

Change To Plan: Amend modification

Legally Compliant?: Not Specified

Full Reference: O - 66007 - 17653 - PM/SC/2/G - i, ii, iii, iv

## 66090 Object

**Respondent:** Ely Diocesan Board of Finance [3062]

**Agent:** Carter Jonas LLP (Brian Flynn) [17331]

Summary: Relevant sections of attached document: 15 to 19

The Green Belt has been incorrectly treated as a near absolute constraint, when in fact it is a planning policy tool which can and should be varied to meet development needs. The Inner Green Belt Review 2015 fails to consider the relationship between the Green Belt and sustainable development.

It is contrary to NPPF 85 bullet point 3.

Furthermore, no additional or alternative land has been considered or assessed as potential safeguarded land for housing or employment. Green Belt boundaries will need to be altered again at the end of the plan period it has no permanence and will not endure beyond the plan period.

Change To Plan: We request that the Green Belt boundary should be reassessed in conjunction with the delivery of sustainable development, and in particular meeting full objectively assessed housing and employment needs and whether safeguarded land needs to be identified. We request that all of the EDBF sites should be released from the Green Belt, and allocated for development or identified as safeguarded land to meet long term development needs. The issue of safeguarded land has not been properly considered in Draft SCLP or the supporting evidence.

Legally Compliant?: Not Specified

Full Reference: O - 66090 - 3062 - PM/SC/2/G - i, ii, iii, iv

## 66112 Object

**Respondent:** Grosvenor Developments Ltd and USS [25482]

**Agent:** Savills (Mr Colin Campbell) [15804]

Summary: The Cambridge Inner Green Belt Boundary Study, LDA Design, November, 2015, is not an appropriate evidence base and does not overcome issues identified at the EiP.

As part of reviewing this report, a number of concerns relating to the methodology have been determined that skew the results for sector 7. The assessment of Sector 7 is not appropriate.

Change To Plan: Delete modification

Legally Compliant?: Not Specified

Full Reference: O - 66112 - 25482 - PM/SC/2/G - i, ii, iii

## 66152 Object

**Respondent:** South Barton Road Land Owners Group [21301]

**Agent:** Carter Jonas LLP (Brian Flynn) [17331]

Summary: Relevant sections of attached document: 27 to 32

The Green Belt has been incorrectly treated as a near absolute constraint, when in fact it is a planning policy tool which can and should be varied to meet development needs. The Inner Green Belt Review 2015 fails to consider the relationship between the Green Belt and sustainable development.

It is contrary to NPPF 85 bullet point 3.

The Inner Green Belt Review 2015 is bias towards the issue of setting.

The Inner Green Belt Review 2015 exaggerates the 'unspoilt' nature of the views from the west of Cambridge.

Change To Plan: The methodology of the Inner Green Belt Review is not robust. We request that the Green Belt boundary should be reassessed in conjunction with the delivery of sustainable development and in particular meeting full objectively assessed housing needs and whether safeguarded land needs to be identified. We request that land South of Barton Road is released from the Green Belt and identified as safeguarded land to meet development needs beyond the plan period.

Legally Compliant?: Not Specified

Full Reference: O - 66152 - 21301 - PM/SC/2/G - i, ii, iii, iv

## 66169 Object

**Respondent: Great Shelford Ten Acres Limited [8948]**

**Agent: Bidwells (Mrs Stacey Rawlings) [3140]**

Summary: The inclusion of the wording at paragraph 2.32 fails to acknowledge the results of the inner Green Belt review. The plan is therefore not based on proportionate evidence and is not the most appropriate strategy when considered against reasonable alternatives.  
The modification is inaccurate and the findings of the 2015 Inner Green Belt study have not been properly carried forward into the plan making process.  
It is contrary to NPPF 85.

See attached documents:

\* PM\_SC\_2\_G.pdf

\* Critique of the Councils' Sustainability Appraisal.pdf

Change To Plan: Land off Cambridge Road, should be removed from the Green Belt.  
Consequential changes should be made to the Proposals maps to show the land as White Land as a minimum or in the event that our parallel objections to the Housing Land Supply are sustained, to allocate the site for housing.

Legally Compliant?: Not Specified

Full Reference: O - 66169 - 8948 - PM/SC/2/G - ii, iii

## 66191 Object

**Respondent: North Barton Road Land Owners Group [21302]**

**Agent: Carter Jonas LLP (Brian Flynn) [17331]**

Summary: CSa, on behalf of North BRLOG, has undertaken an assessment of the Inner Green Belt Review 2015, and concludes that:

-It is bias towards 'setting'

-Exaggerates the 'unspoilt' nature of the views from the west of Cambridge

-Assumes that development would occur across North of Barton Road

The Local Plans CSRM Transport Report supports the merits of development on the edge of Cambridge.

The land to the North of Barton Road:

-Does not require transport measures to generate a high level of trips by walking and cycling.

-Provides an opportunity to facilitate sections of the radial and orbital routes proposed as City Deal projects.

Relevant attachments:

-CSa 2025\_05a LDA Green Belt Response.pdf

-Transport Technical Note - PBA LP Mods and SA

-5352-L-05 Masterplan (3).pdf

-North BRLOG LP Mods Jan 2016.pdf : Paragraphs 46 to 52.pdf

Change To Plan: The methodology of the Inner Green Belt Review is not robust. We request that the Green Belt boundary should be reassessed in conjunction with the delivery of sustainable development and in particular meeting full objectively assessed housing needs. We request that land North of Barton Road is released from the Green Belt and identified as a strategic site allocation.

Legally Compliant?: Not Specified

Full Reference: O - 66191 - 21302 - PM/SC/2/G - i, ii, iv

65145 Support

Respondent: Historic England (Mr David Grech) [23622] Agent: N/A

Summary: Welcome Cambridge Inner Green Belt Boundary Study, which provides evidence base to underpin decisions for further release of Green Belt land. Support methodology, agree with findings (paragraph 0.4.2). Accept main conclusions (paragraphs 0.6.1 & 0.6.2). Findings based on robust understanding of green belt purpose in criteria-based assessment of scenarios (paragraph 6.0). Methodology different to that used by Councils, but similar conclusions (LDA 3.0 and LDA 6.3.1).

Welcome Study's recommendation that land release in north western corner of sub-area 13.1 should extend no further east than Yarrow Road roundabout. Requested in our original response, though we did not pursue when agreeing our Statement of Common Ground - accepted development would not directly impact on historic environment, nor views from Fulbourn Hospital Conservation Area.

Historic England confirm nothing that would undermine previously agreed SoCG concerning Green Belt.

Change To Plan:  
Legally Compliant?: Not Specified

Full Reference: S - 65145 - 23622 - PM/SC/2/G - None

65934 Support

Respondent: Cambridge Past Present and Future (Ms Stacey Weiser) [20942] Agent: N/A

Summary: CambridgePPF supports the proposed additional changes to the inner boundary of the Green Belt as specified in the amendment in Para 2.32. This includes the reduction in the land to be released to the Peterhouse Technology Park and the release of the land south of the Addenbrookes Biomedical Campus, subject to a number of conditions that we will raise if the site is ever actually subject to a planning application. (See rep 65942 with proposed amendment to Policy E/1B wording)

Change To Plan:  
Legally Compliant?: Not Specified

Full Reference: S - 65934 - 20942 - PM/SC/2/G - None

**65311 Object**                      **Respondent:** Barratt Eastern Counties and the North West Cambridge Consortium of Landowners [17788]                      **Agent:**    BIDWELLS LLP (MISS MARCIA WHITEHEAD) [25328]

Summary: We object to the Proposed Modification to Policy S/5 increasing the Council's housing target by 500 homes to 19,500 dwellings. The Further Evidence in relation to the OAN to which the Proposed Modification refers is flawed and fails to fully consider economic trends.

Consequently, the Council's housing requirement is not founded on robust evidence prepared in a manner compliant with the NPPF and PPG. The Inspectors' concerns have not been fully addressed and the Council's Housing target still does not meet the OAN. The Proposed Modifications are therefore unsound as they are not:

- \* positively prepared;
- \* justified;
- \* consistent with National Policy.

Change To Plan: he proposed housing requirement referred to in the Proposed Modification to Policy S/5 should be increased and that further amendments should be made to the proposed wording of the paragraph to reflect this.

In our previous Matter 3 Written Statement we stated that the housing targets should be at least 24,400 dwellings for South Cambridgeshire which we maintain is still the case.

It is considered that this revised approach would enable the Council to meet the objectively assessed housing needs for Cambridge in full and boost significantly the supply of housing in accordance with the requirements of Government guidance in the NPPF paragraphs 47 and 159. As such, this will ensure that the Plan is Sound.

Legally Compliant?: No

Full Reference: O - 65311 - 17788 - PM/SC/2/H - i, ii, iv

**65438 Object**                      **Respondent:** Pigeon Land & LIH [25320]                      **Agent:**    CODE Development Planners Ltd (Ms Karen Beech) [25295]

- Summary: The level of objectively assessed housing need has been under-estimated for:
1. The demographic projections have not been adjusted to take account of the assumption that household formation amongst younger households is suppressed.
  2. Economic growth expectations have not been addressed so there is a misalignment between jobs and homes.
  3. Significant key market signals; land values and past under delivery have not been considered.
  4. No adjustment has been made to take account of the level of affordable housing need.
  5. The full objectively assessed housing requirement for Cambridge is 15,200 dwellings and for South Cambridgeshire is 27,000 dwellings.

Relevant documents:  
\*GLHearn Report - Whole Document  
\*160125\_CSTpt.pdf - Executive summary; Section 1 - Introduction - para 1.1 to 1.6; Section 2 - OAHN & Housing Need - Section 2.1 (2.1.1 to 2.1.13); Section 7 - Conclusions - para 7.1 to 7.6

Change To Plan: In order to make the Local Plans sound in respect of objectively assessed housing needs, the housing requirement should be increased to reflect the full objectively assessed housing need resulting in a figure of 15,200 in Cambridge and 27,000 in South Cambridgeshire.

Legally Compliant?: Yes

Full Reference: O - 65438 - 25320 - PM/SC/2/H - i, ii, iii, iv

65475 Object

Respondent: Bidwells (Miss Marcia Whitehead) [17324]

Agent: Bidwells LLP (Alison Barnes) [25318]

Summary: Bidwells object to the Proposed Modification to Policy S/5 increasing the Council's housing target by 500 homes to 19,500 dwellings. The Further Evidence in relation to the OAN to which the Proposed Modification refers is flawed and fails to fully consider economic trends.

The Council's housing requirement is not founded on robust evidence prepared in a manner compliant with the NPPF and PPG. The Inspectors' concerns have not been fully addressed and the Council's Housing target still does not meet the OAN. The Proposed Modifications are therefore unsound as they are not:

- \* positively prepared;
- \* justified;
- \* consistent with National Policy.

Change To Plan: Bidwells therefore consider that the proposed housing requirement referred to in the Proposed Modification to Policy S/5 should be amended and increased and that further amendments should be made to the proposed wording of the paragraph to reflect this.

In our previous Matter 3 Written Statement we stated that the housing targets should be at least 24,400 dwellings for South Cambridgeshire which we maintain is still the case.

It is considered that this revised approach would enable the Council to meet the objectively assessed housing needs for Cambridge in full and boost significantly the supply of housing in accordance with the requirements of Government guidance in the NPPF paragraphs 47 and 159. As such, this will ensure that the Plan is Sound.

Legally Compliant?: No

Full Reference: O - 65475 - 17324 - PM/SC/2/H - i, ii, iv

65500 Object

Respondent: Hill Residential [25378]

Agent: KWA Architects (Mrs Meghan Bonner) [25377]

Summary: The policy is Unjustified. It is not the most appropriate strategy when considered against reasonable alternatives. The Big City Deal will create 5,200 jobs within five miles of the site.  
Increasing the housing allocation on site H1b would represent a sustainable and deliverable approach to address local housing needs The policy is Negatively prepared.  
Housing numbers ignore the most recent and relevant housing data and fail to make best use of the land.  
The policy fails to comply with National Planning Policy by falling short of density requirements.  
Increasing the housing allocation to 120 on site H1:b could address this.

Change To Plan: An increase in the housing allocation on site H1:b from 80 dwellings to 120 dwellings.

Legally Compliant?: No

Full Reference: O - 65500 - 25378 - PM/SC/2/H - i, ii, iv



65525 Object

Respondent: Endurance Estates Limited [19174]

Agent: Bidwells LLP (Susan Chappell) [25316]

Summary: Endurance Estates object to the Proposed Modification to Policy S/5 increasing the Council's housing target by 500 homes to 19,500 dwellings. The Further Evidence in relation to the OAN to which the Proposed Modification refers is flawed and fails to fully consider economic trends.

The Council's housing requirement is not founded on robust evidence prepared in a manner compliant with the NPPF and PPG. The Inspectors' concerns have not been fully addressed and the Council's Housing target still does not meet the OAN. The Proposed Modifications are therefore unsound as they are not:

- \* positively prepared;
- \* justified;
- \* consistent with National Policy.

Change To Plan: Endurance Estates therefore consider that the proposed housing requirement referred to in the Proposed Modification to Policy S/5 should be amended and increased and that further amendments should be made to the proposed wording of the paragraph to reflect this.

In our previous Matter 3 Written Statement we stated that the housing targets should be at least 24,400 dwellings for South Cambridgeshire which we maintain is still the case.

It is considered that this revised approach would enable the Council to meet the objectively assessed housing needs for Cambridge in full and boost significantly the supply of housing in accordance with the requirements of Government guidance in the NPPF paragraphs 47 and 159. As such, this will ensure that the Plan is Sound.

Legally Compliant?: No

Full Reference: O - 65525 - 19174 - PM/SC/2/H - i, ii, iv

65575 Object

Respondent: Unwins and Biggs [25382]

Agent: Bidwells LLP (Alison Barnes) [25318]

Summary: Unwins and Biggs object to the Proposed Modification to Policy S/5 increasing the Council's housing target by 500 homes to 19,500 dwellings. The Further Evidence in relation to the OAN to which the Proposed Modification refers is flawed and fails to fully consider economic trends.

The Council's housing requirement is not founded on robust evidence prepared in a manner compliant with the NPPF and PPG. The Inspectors' concerns haven't been fully addressed and the Council's Housing target still does not meet the OAN. The Proposed Modifications are therefore unsound as they aren't:

- \* positively prepared;
- \* justified;
- \* consistent with National Policy.

Change To Plan: Unwins and Biggs therefore consider that the proposed housing requirement referred to in the Proposed Modification to Policy S/5 should be amended and increased and that further amendments should be made to the proposed wording of the paragraph to reflect this.

In our previous Matter 3 Written Statement we stated that the housing targets should be at least 24,400 dwellings for South Cambridgeshire which we maintain is still the case.

It is considered that this revised approach would enable the Council to meet the objectively assessed housing needs for Cambridge in full and boost significantly the supply of housing in accordance with the requirements of Government guidance in the NPPF paragraphs 47 and 159. As such, this will ensure that the Plan is Sound.

Legally Compliant?: No

Full Reference: O - 65575 - 25382 - PM/SC/2/H - i, ii, iv

## 65593 Object

**Respondent: Pembroke College & the Balaam Family [21173]**

**Agent: Bidwells LLP (Susan Chappell) [25316]**

Summary: Pembroke College & the Balaam Family object to Proposed Modification to Policy S/5 increasing the Council's housing target by 500 homes to 19,500 dwellings. Further Evidence in relation to OAN to which the Proposed Modification refers is flawed and fails to fully consider economic trends.

The Council's housing requirement is not founded on robust evidence prepared in a manner compliant with the NPPF and PPG. The Inspectors' concerns have not been fully addressed and the Council's Housing target still does not meet the OAN. Proposed Modifications are unsound as they are not:

- \* positively prepared;
- \* justified;
- \* consistent with National Policy.

Change To Plan: Pembroke College & the Balaam Family therefore consider that the proposed housing requirement referred to in the Proposed Modification to Policy S/5 should be amended and increased and that further amendments should be made to the proposed wording of the paragraph to reflect this.

In our previous Matter 3 Written Statement we stated that the housing targets should be at least 24,400 dwellings for South Cambridgeshire which we maintain is still the case.

It is considered that this revised approach would enable the Council to meet the objectively assessed housing needs for Cambridge in full and boost significantly the supply of housing in accordance with the requirements of Government guidance in the NPPF paragraphs 47 and 159. As such, this will ensure that the Plan is Sound.

Legally Compliant?: No

Full Reference: O - 65593 - 21173 - PM/SC/2/H - i, ii, iv

## 65730 Object

**Respondent: RLW Estates [1284]**

**Agent: Boyer Planning (Matthew Clarke) [9069]**

Summary: Object to the proposed change in growth of new homes from 19,000 to 19,500 dwellings as the housing requirement for South Cambridgeshire. Whilst we cautiously welcome the fact there has been an increase, and this has been rightly applied to South Cambridgeshire in view of constrained capacity within Cambridge City, it is considered this falls short of the 20,600 dwelling level indicated by High Migration economic growth forecast for Cambridge and South Cambridgeshire combined. We would draw attention to our recent comments on implications of DCLG 2012-based Household Projections, in response to the opportunity afforded by the Inspectors in November 2015. For ease of reference our comments are summarised in this rep.

Change To Plan: Amend modification

Legally Compliant?: Not Specified

Full Reference: O - 65730 - 1284 - PM/SC/2/H - i, iv

## 65739 Object

**Respondent: Cambridge University Health Partners (Dr Hans Hagen) [25440]**

**Agent: N/A**

Summary: We understand that the modification is based on an overall Cambridge Local Plan housing requirement of 33,000 homes. We believe that this estimate does not properly take into account planned and expected employment growth across all sectors across the region.

Change To Plan: An amendment to the Modification to reflect a South Cambridgeshire housing requirement closer to 30,000 homes, and the importance of providing appropriate housing within cycle/walk/public transport distance of CBC and neighbouring growth sites.

Legally Compliant?: Not Specified

Full Reference: O - 65739 - 25440 - PM/SC/2/H - i, iii

## 65763 Object

**Respondent:** Urban & Civic [24293]

**Agent:** David Lock Associates (Darren Bell) [24750]

**Summary:** 19,500 based upon Cambridgeshire sub-regional Strategic Housing Market Assessment 2013 and Objectively Assessed Housing Need Further evidence November 2015. Demographic 'starting point' taken from Sub-National Population Projections (CLG 2012) - 17,052 dwellings 2011-2031 - agreed as reasonable. Report concluded uplift is required to account for market signals (paragraph 3.33) - also agreed.

Size of adjustment inadequately reflects future jobs. PBA apply 10% uplift, drawing from Eastleigh and Uttlesford regarding "modest" market pressures. In Cambridge 30% uplift applied with reference to Canterbury where overlapping market pressures and future jobs taken into account. Report does not consider consequences of higher future jobs growth (paragraph 3.47).

East of England Forecasting Model High Migration scenario (2013) should be used. More robust. 34,600 dwellings required for Cambridge and South Cambridgeshire. 14,000 dwellings for Cambridge appropriate. Adjustment needed in South Cambridgeshire to 20,600 dwellings (1,030 per annum), 21% uplift. Too low OAN would further exacerbate affordability and encourage unsustainable travel patterns.

**Change To Plan:** Amend modification

**Legally Compliant?:** Not Specified

**Full Reference:** O - 65763 - 24293 - PM/SC/2/H - i, iv

## 65834 Object

**Respondent:** CALA Homes (North Homes Counties) Ltd [25454]

**Agent:** Carter Jonas LLP (Brian Flynn) [17331]

**Summary:** The minor increase to the housing requirement would not meet objectively assessed housing needs. The housing requirement remains at the lower end of possible options, and will not address the housing crises and chronic shortage of affordable housing in Cambridge and South Cambridgeshire.

We note that the Inspector concluded that the SHMA Assessment, from which the previous housing target of 19,000 dwellings was derived, was at the lower end of the likely range of possible levels of housing need. An increase of only 500 dwellings would still be at the lower end and as such would not be a positive outcome and would not boost significantly the supply of housing.

We have requested that the housing target should be increased to a minimum of 21,500 dwellings, which is the target that was promoted by other parties in representations and at the examination. We also concluded that it was likely that the housing target would need to be increased above this level to meet unmet needs from Cambridge.

**Change To Plan:** We request that the housing target for South Cambridgeshire in Policy S/5 should be increased, to include meeting any unmet needs from Cambridge through the Duty to Cooperate process.

**Legally Compliant?:** Not Specified

**Full Reference:** O - 65834 - 25454 - PM/SC/2/H - i, ii, iv

## 65850 Object

**Respondent:** Mr C Meadows [21155]

**Agent:** Carter Jonas LLP (Brian Flynn) [17331]

**Summary:** The minor increase to the housing requirement would not meet objectively assessed housing needs. The housing requirement remains at the lower end of possible options, and will not address the housing crises and chronic shortage of affordable housing in Cambridge and South Cambridgeshire.

We note that the Inspector concluded that the SHMA Assessment, from which the previous housing target of 19,000 dwellings was derived, was at the lower end of the likely range of possible levels of housing need. An increase of only 500 dwellings would still be at the lower end and as such would not be a positive outcome and would not boost significantly the supply of housing.

We have requested that the housing target should be increased to a minimum of 21,500 dwellings, which is the target that was promoted by other parties in representations and at the examination. We also concluded that it was likely that the housing target would need to be increased above this level to meet unmet needs from Cambridge.

**Change To Plan:** We request that the housing target for South Cambridgeshire in Policy S/5 should be increased, to include meeting any unmet needs from Cambridge through the DtC process.

**Legally Compliant?:** Not Specified

**Full Reference:** O - 65850 - 21155 - PM/SC/2/H - i, ii, iv

## 65860 Object

**Respondent: Mr Roger Worboys [3125]**

**Agent: Carter Jonas LLP (Brian Flynn) [17331]**

Summary: The minor increase to the housing requirement would not meet objectively assessed housing needs. The housing requirement remains at the lower end of possible options, and will not address the housing crises and chronic shortage of affordable housing in Cambridge and South Cambridgeshire.

We note that the Inspector concluded that the SHMA Assessment, from which the previous housing target of 19,000 dwellings was derived, was at the lower end of the likely range of possible levels of housing need. An increase of only 500 dwellings would still be at the lower end and as such would not be a positive outcome and would not boost significantly the supply of housing.

We have requested that the housing target should be increased to a minimum of 21,500 dwellings, which is the target that was promoted by other parties in representations and at the examination. We also concluded that it was likely that the housing target would need to be increased above this level to meet unmet needs from Cambridge.

Change To Plan: We request that the housing target for South Cambridgeshire in Policy S/5 should be increased, to include meeting any unmet needs from Cambridge through the DtC process.

Legally Compliant?: Not Specified

Full Reference: O - 65860 - 3125 - PM/SC/2/H - i, ii, iv

## 65861 Object

**Respondent: Mr Roger Worboys [3125]**

**Agent: Carter Jonas LLP (Brian Flynn) [17331]**

Summary: The proposed housing target is not a step change in housing delivery, but demonstrates that some identified housing sites are not delivered in accordance with the housing trajectory and that overall there is under-delivery against the housing requirement.

Change To Plan: We request that the housing target for South Cambridgeshire in Policy S/5 should be increased, to include meeting any unmet needs from Cambridge through the DtC process.

As requested in Modification PM/SC/2/R: Policy S/12, we request that a more robust assessment of housing delivery is undertaken and the housing trajectory is revised accordingly.

Legally Compliant?: Not Specified

Full Reference: O - 65861 - 3125 - PM/SC/2/H - i, ii, iv

## 65911 Object

**Respondent: The Quay Estate [25458]**

**Agent: Carter Jonas LLP (Mr Richard Seamark) [15727]**

Summary: An increase of only 500 dwellings would still be at the lower end of possible options, and as such would not be a positive outcome and would not boost significantly the supply of housing.

The housing target for South Cambridgeshire should be increased to a minimum of 21,500 dwellings (1,075 dpa), to meet unmet needs from Cambridge that cannot be accommodated within the City through the Duty to Cooperate process. Appropriate adjustments should be made to comply with the requirements of Paragraphs 014 to 029 of the Planning Practice Guidance.

Change To Plan: We request that the housing target for South Cambridgeshire in Policy S/5 should be increased, to include meeting any unmet needs from Cambridge through the Duty to Cooperate ('DtC') process.

Legally Compliant?: Not Specified

Full Reference: O - 65911 - 25458 - PM/SC/2/H - i, ii, iii, iv

## 65952 Object

**Respondent: Bloor Homes Eastern [16420]**

**Agent: Pegasus Planning Group (Nicky Parsons) [15818]**

Summary: Underestimates objectively assessed needs in Cambridge and South Cambridgeshire. Previous representations suggested uplift of 2,500 dwellings for South Cambridgeshire (and 1,000 in Cambridge) to reflect high-migration scenario contained within East of England Forecasting Model.

Detailed modelling by representors at Examination indicated around 43,000 dwellings across both authorities.

Uplift in OAN would necessitate allocation of additional sites. Under Duty to Cooperate the difference should be apportioned to South Cambridgeshire, in rural settlements.

Unclear how rural exceptions accounted for in Council's housing trajectory - not specifically identified; assume subsumed in windfall allowance.

City Deal funding conditional upon meeting targets. Essential to deliver infrastructure to support largest allocations. Uncertainty over rural exception housing to meet City Deal target exacerbates wider uncertainty if funding triggers will be met and infrastructure can be delivered.

Change To Plan: In our assessment and those of other representors the 500 dwelling uplift does not represent the full objectively assessed need for South Cambridgeshire. Additional sites should be identified in South Cambridgeshire, including those in sustainable rural settlements. These rural settlements can also assist in meeting any unmet need arising in Cambridge City.

We request that the housing requirement in South Cambridgeshire - irrespective of any conclusion on objectively assessed need - is increased by at least a further 820 dwellings to account for the City Deal commitment. Given that the delivery of these rural exception dwellings forms part of the City Deal commitment by which future funding tranches will be triggered, these additional dwellings should come forward in the next five years of the Local Plan.

Legally Compliant?: Not Specified

Full Reference: O - 65952 - 16420 - PM/SC/2/H - None

## 65982 Object

**Respondent: Scott Properties [25474]**

**Agent: Barton Willmore (Lauren Dooley) [25473]**

Summary: Objectively Assessed Need: The PBA Study concludes that DCLG 2012 projections predict growth of 17,579 new dwellings in South Cambridgeshire. This is below the SHMA prediction. We would argue that the SHMA findings should not be readily dismissed in light of the DCLG predictions being lower, and that the prudent approach would be to take the higher figure set out in the SHMA.

Market Signals: We would argue that insufficient evidence has been put forward in the PBA Study to suggest that the 10% uplift should apply or is appropriate to South Cambridgeshire and that the uplift to take into account market signals should be applied to the SHMA prediction of 19,000 dwellings. If the uplift was agreed at 10%, the OAN in South Cambridgeshire would be 20,900 dwellings.

City Deal: The housing figure for South Cambridgeshire does not meet OAN plus the 1,000 units agreed through City Deal on rural exception sites.

Change To Plan:

Legally Compliant?: Not Specified

Full Reference: O - 65982 - 25474 - PM/SC/2/H - None

## 66008 Object

**Respondent: Commercial Estates Group [17653]**

**Agent: Nathaniel Lichfield & Partners (Mr Matthew Spry) [20555]**

Summary: CEG maintains that the Objectively Assessed Housing Need (OAHN) for the HMA is greater than the Councils propose, and the need in South Cambridgeshire (on the edge of the City) is greater than the 19,500 homes now provided by the draft South Cambridgeshire Local Plan.

This representation is supported by a range of technical papers which form part of and support this representation, including a Technical Paper on OAHN (CEG Representation Appendix 2). This Paper provides a critique of the latest PBA assessment and sets out the reasons why the OAHN must be increased to 41,000 new homes if the jobs target of 44,000 is to be met.

Relevant Attachment  
Cambridge South East 1.4 Section 2(a)-OAHN (2.2-2.13)  
Appendix 2(OAHN)

Change To Plan: Amend modification

Legally Compliant?: Not Specified

Full Reference: O - 66008 - 17653 - PM/SC/2/H - i, ii, iii, iv

## 66039 Object

**Respondent:** Martin Grant Homes Ltd & Harcourt Developments (UK) Ltd [21709]

**Agent:** Savills (Mr Andrew Raven) [18884]

**Summary:** An uplift of a minimum of 20% should be applied to housing numbers in South Cambridgeshire in accordance with the research conclusions attached. It remains unclear how strategic infrastructure will be delivered and how the strategic development alternatives have been compared. The SEA / SA is flawed, and therefore changes that are required to make the Local Plan sound have not been included in the modifications.

Object to consequential modifications to PM/SC/2/A, PM/SC/2/B, PM/SC/2/C, PM/SC/2/D, PM/SC/2/E, PM/SC/2/J, PM/SC/2/K, PM/SC/2/L, PM/SC/2/M, PM/SC/2/N, PM/SC/2/R, and PM/SC/2/T.

**Change To Plan:**

**Legally Compliant?:** No

**Full Reference:** O - 66039 - 21709 - PM/SC/2/H - i, ii, iii, iv

## 66045 Object

**Respondent:** Gladman Developments (Nicole Penfold) [19878]

**Agent:** N/A

**Summary:** PBA work does not represent full and objective assessment of need. Simply responds to concerns of Inspectors. PBA work references - analysis "does not take account of future jobs, because this factor has already been considered by the SHMA, in an analysis which the Inspectors have not questioned." Gladman consider this a fundamental failure to prepare robust evidence to address Inspectors' concerns.

Approach adopted by Councils is to meet employment needs in surrounding authorities recognising this will result in significant increases in-commuting. Not considered an OAN assumption, instead policy-on adjustment - adopts a policy of distributing housing need across sub-regional authorities instead of across Cambridge and South Cambridgeshire. Effect of South Cambridgeshire meeting its own employment needs can be seen from page 101 of Edge Analytics report - concludes to meet East of England Forecasting Model's employment growth forecast would require around 1,070 dwellings per annum between 2012 and 2037 (26,750 dwellings).

(May result in consequential changes to Mods PM/SC/2/A, PM/SC/2/I, PM/SC/2/J, PM/SC/2/K, PM/SC/2/L, PM/SC/2/M, PM/SC/2/T)

**Change To Plan:**

**Legally Compliant?:** Not Specified

**Full Reference:** O - 66045 - 19878 - PM/SC/2/H - None

## 66053 Object

**Respondent:** Laragh Homes [25312]

**Agent:** Strutt & Parker LLP (Mr Jon Jennings) [25077]

**Summary:** NPPF not only requires Local Planning Authorities to boost significantly the supply of housing (para 2.7) but also requires local authorities to ensure choice and competition in the market for land. Furthermore, the NPPF requires LPAs to 'identify a supply of specific, developable sites or broad locations for growth for 6-10 years and, where possible, for years 11-15'. Therefore, the modifications should take the opportunity to allocate a wider range of developable sites in sustainable locations such as Swavesey to ensure that there are sufficient sites to maintain a 5 year supply of housing land over the plan period whilst maintaining competition in the market for land.

**Change To Plan:** Delete and amend modification

**Legally Compliant?:** Not Specified

**Full Reference:** O - 66053 - 25312 - PM/SC/2/H - i, ii, iii, iv

## 66056 Object

**Respondent:** Laragh Homes [25312]

**Agent:** Strutt & Parker LLP (Mr Jon Jennings) [25077]

**Summary:** Despite the OAN resulting in a housing requirement increase of 500 homes in South Cambridgeshire, the figure of 19,500 is at the very low end of OAN for new homes and the figure should therefore be higher. When considered against the DCLG household projections an uplift of 10% has been applied. Considering that the development strategy suggests Cambridge and South Cambridgeshire are closely linked, South Cambridgeshire should also have the 30% uplift that Cambridge has.

**Change To Plan:** Delete and amend modification

**Legally Compliant?:** Not Specified

**Full Reference:** O - 66056 - 25312 - PM/SC/2/H - i, ii, iii, iv

## 66063 Object

**Respondent: South Cambridgeshire Green Party (Miss Eleanor Crane) [25357]**

**Agent: N/A**

Summary: Increasing the estimated housing requirement to 19,500:

- \* Green Belt protection must not be weakened;
- \* Objective of plan should be to achieve sustainability and quality of life, not simply to service projected growth in jobs;
- \* Housing need should first be met through better use of existing stock (empty dwellings, second homes, under-occupancy);
- \* A range of options should be explored to ensure new housing is genuinely affordable for the majority of people, including social and commonly owned housing.

Change To Plan:

Legally Compliant?: Not Specified

Full Reference: O - 66063 - 25357 - PM/SC/2/H - None

## 66085 Object

**Respondent: Ely Diocesan Board of Finance [3062]**

**Agent: Carter Jonas LLP (Brian Flynn) [17331]**

Summary: Relevant sections of attached document: 7 to 11.

In our opinion, an increase of only 500 dwellings would still be at the lower end of possible options, and as such would not be a positive outcome and would not boost significantly the supply of housing.

The housing target should be increased to a minimum of 21,500, with appropriate adjustments made to comply with the requirements of Paragraphs 014 to 029 of the NPPG and address the housing crisis and affordable housing shortage in Cambridge and South Cambridgeshire. More affordable housing is needed to make sustainable villages and to meet local needs.

Change To Plan: We request that the housing target for South Cambridgeshire in Policy S/5 should be increased, to include meeting any unmet needs from Cambridge through the DtC process.

Legally Compliant?: Not Specified

Full Reference: O - 66085 - 3062 - PM/SC/2/H - i, ii, iii, iv

## 66103 Object

**Respondent: Grosvenor Developments Ltd and USS [25482]**

**Agent: Savills (Mr Colin Campbell) [15804]**

Summary: Updated assessment of housing need is not considered to be appropriate evidence to justify the plan.

Cambridge prices stand 45% above the 2007/08, South Cambridgeshire are at +25%. In E&W prices are c2.5% above 2007/08 peak.

Canterbury and Uttlesford currently c20% above 2007 peak, and Eastleigh is c10% above. Eastleigh is not comparable to South Cambridgeshire. Canterbury is more appropriate for comparison with South Cambridgeshire.

South Cambridgeshire uplift should be significantly higher than 20% and a strong case that it should be higher than Canterbury.

Cambridge City significantly outstrips Canterbury. Uplift for market signals should be significantly higher than 30%.

Change To Plan: Amend modification

Legally Compliant?: Not Specified

Full Reference: O - 66103 - 25482 - PM/SC/2/H - i, ii, iii, iv

## 66114 Object

**Respondent: Grosvenor Developments Ltd and USS [25482]**

**Agent: Savills (Mr Colin Campbell) [15804]**

Summary: SA scores the plans as positive for housing, including affordable housing. Table 10 of the Councils' Matter 3 statements identify that every year in Cambridge there is newly arising affordable need of 404 homes. The plans therefore cannot meet needs in and on the edge of Cambridge at the end of the plan period when only c350 homes are delivered each year.

The housing figures will not deliver sufficient new homes to tackle the need for affordable housing. At the end of the plan period the back log will be greater than at the start of the plan period.

Change To Plan: Delete modification

Legally Compliant?: Not Specified

Full Reference: O - 66114 - 25482 - PM/SC/2/H - i, ii, iii, iv

## 66130 Object

**Respondent: Cambridgeshire County Council - Strategic Assets Team [25478]**

**Agent: Carter Jonas LLP (Brian Flynn) [17331]**

Summary: The PBA Report on Objectively Assessed Housing Need is inadequate.

No increase for Cambridge and an increase of only 500 dwellings for South Cambridgeshire would still be at the lower end of possible options, and as such would not be a positive outcome and would not boost significantly the supply of housing.

The housing target for Cambridge and South Cambridgeshire should be 42,780 dwellings over the period 2011-2031, with wappropriate adjustments made to comply with the requirements of Paragraphs 014 to 029 of the NPPG.

The housing target needs to be increased to address the housing crisis and chronic shortage of affordable housing in Cambridge and South Cambridgeshire.

Relevant paragraphs of supporting document: 17 to 22

Change To Plan: We request that the housing target for South Cambridgeshire in Policy S/5 should be increased.

Legally Compliant?: Not Specified

Full Reference: O - 66130 - 25478 - PM/SC/2/H - i, ii, iii, iv

## 66141 Object

**Respondent: North Barton Road Land Owners Group [21302]**

**Agent: Carter Jonas LLP (Brian Flynn) [17331]**

Summary: The PBA Report does not provide a guidance-compliant assessment of Objectively-Assessed Housing Need. It is flawed because it fails to consider:

-The plans' economic aspirations and the level of housing provision necessary to support this;

-Assumptions inherent in demographic modelling; and

-land values as a market signal, which point to constrained residential land supply in Cambridge. This is in conflict with the PPG.

Relevant attachments:

-Jan Representations OAN (25.01.16).pdf

-North BRLOG LP Mods Jan 2016.pdf : Paragraphs 32 to 35.pdf

Change To Plan: We request that the housing target for South Cambridgeshire in Policy S/5 should be increased to 27,000 dwellings between 2011 and 2031. The unmet needs from Cambridge should be met within South Cambridgeshire through the DtC and added to the requirement in Draft SCLP.

Legally Compliant?: Not Specified

Full Reference: O - 66141 - 21302 - PM/SC/2/H - i, ii, iv

## 66146 Object

**Respondent: South Barton Road Land Owners Group [21301]**

**Agent: Carter Jonas LLP (Brian Flynn) [17331]**

Summary: Relevant paragraphs of supporting document: 17 to 20.

Do not agree with Objectively Assessed Housing Need - Further Evidence (prepared by Peter Brett Associates), which supports the modification for the following reasons:

\*It ignores the plans' economic aspirations and the level of housing provision necessary to support this;

\*It fails to consider assumptions inherent in demographic modelling used on household formation rates;

\*It does not consider land values as a market signal;

\*It is dismissive of the affordable housing need.

The Plans' housing assumption will result in a deterioration of affordable housing, constrain economic growth and create a shortfall in housing delivery. 15,200 should be provided in Cambridge and 27,000 in South Cambridgeshire.

Change To Plan: We request that the housing target for South Cambridgeshire in Policy S/5 should be increased to 27,000 dwellings between 2011 and 2031. The unmet needs from Cambridge should be met within South Cambridgeshire through the DtC and added to the requirement in Draft SCLP.

Legally Compliant?: Not Specified

Full Reference: O - 66146 - 21301 - PM/SC/2/H - i, ii, iii, iv



## 66157 Object

**Respondent: Shelford Investments Ltd [21149]**

**Agent: Carter Jonas LLP (Brian Flynn) [17331]**

Summary: Relevant paragraphs in supporting documents: 8 to 13

South Cambridgeshire's housing target would still be at the lower end of possible options. This would not result in a positive outcome or boost significantly the supply of housing.

The housing target for South Cambridgeshire should be increased to a minimum of 21,500 dwellings (1,075 dpa), although it was likely that the housing target would need to be higher to meet unmet needs from Cambridge.

Support the increase in housing target, but it should be higher to comply with paragraphs 014 to 029 of the NPPF to address the housing crisis and chronic affordable housing crisis in the area and in New Settlements.

Change To Plan: We request that the housing target for South Cambridgeshire in Policy S/5 should be increased, to include meeting any unmet needs from Cambridge through the DtC process.

Legally Compliant?: Not Specified

Full Reference: O - 66157 - 21149 - PM/SC/2/H - i, ii, iv

## 66170 Object

**Respondent: Great Shelford Ten Acres Limited [8948]**

**Agent: Bidwells (Mrs Stacey Rawlings) [3140]**

Summary: Great Shelford (Ten Acres) Ltd object to the Proposed Modification to Policy S/5 increasing the Council's housing target by 500 homes to 19,500 dwellings. The Further Evidence in relation to the OAN to which the Proposed Modification refers is flawed and fails to fully consider economic trends.

Consequently, the Council's housing requirement is not founded on robust evidence prepared in a manner compliant with the NPPF and PPG. The Inspectors' concerns have not been fully addressed and the Council's Housing target still does not meet the OAN. The Proposed Modifications are therefore unsound as they are not:

- \* positively prepared;

- \* justified;

- \* consistent with National Policy.

Change To Plan: Great Shelford (Ten Acres) Ltd therefore consider that the proposed housing requirement referred to in the Proposed Modifications to Policy S/5 should be increased to 17,930 dwellings and that further amendments should be made to the proposed wording of the paragraph to reflect this.

This revised approach would enable the Council to meet the objectively assessed housing needs for Cambridge in full and boost significantly the supply of housing in accordance with the requirements of the NPPF paragraphs 47 and 159 such that the Plan is Sound.

Legally Compliant?: Not Specified

Full Reference: O - 66170 - 8948 - PM/SC/2/H - i, ii, iv

## 66183 Object

**Respondent: Histon & Impington Parish Council (Ms Chelsea Presland) [20953]**

**Agent: N/A**

Summary: The original plan was produced on the basis of population predictions using 2011 data. Since then AstraZeneca have announced the move to the Biomedical Campus, Papworth Hospital is also to move and the new Cambridge North station has come forward (together with a plan for, in one version, 15000 new jobs in the immediate vicinity). Using the ratio of new jobs to new houses required of 1:1 in the plan, this leads to a substantial predicted increase in demand in the first five years over and above the original plan. The revised plan is not consistent with this change in employment prospects.

Change To Plan: Amend modification

Legally Compliant?: Not Specified

Full Reference: O - 66183 - 20953 - PM/SC/2/H - i

66194 Object

Respondent: MCA Developments Limited [3652]

Agent: Barton Willmore (Mr Steven Kosky) [3212]

Summary: Section 2 identifies that upon objective review of Council's updated evidence base, MCA consider assessment of objective assessed housing need fails to meet requirements in PPG and proposed increase in housing will do little to address Inspector's concerns.

Undertaken detailed technical review of Council's updated evidence base entitled 'Objectively Assessed Housing Need: Further Evidence' - Appendix 4.

From evidence and in light of market signals, proposed increase of only 500 homes insufficient to address Inspectors' concerns. Data shows requirement for between 1,073 and 1,125 dwellings per annum. Based on numbers suggested Council would need to plan for an additional 2,460 -3,500 homes over period 2011-2031.

Unallocated part of West Cambourne Site would deliver an additional 1,150 new dwellings. Significant contribution to meeting OAN.

Results of SA illogical approach taken to allocation of land at West Cambourne. Evidence does not support decision to exclude wider site.

Change To Plan: Amend modification

Legally Compliant?: Not Specified

Full Reference: O - 66194 - 3652 - PM/SC/2/H - i, iii, iv

65143 Support

Respondent: Historic England (Mr David Grech) [23622]

Agent: N/A

Summary: Historic England does not wish to comment on the further independent work commissioned by the two authorities, but we note the conclusion that the current requirement of 14,000 homes for Cambridge is endorsed, and the figure for South Cambridgeshire is to be raised from 19,000 to 19,500 homes.

Historic England does not object to the main modification to the South Cambridgeshire Local Plan in respect of Objectively Assessed Need as set out in paragraph 2.14 of the Proposed Joint Consultation Report.

Change To Plan:

Legally Compliant?: Not Specified

Full Reference: S - 65143 - 23622 - PM/SC/2/H - None

65245 Support

Respondent: A Clegg [8588]

Agent: N/A

Summary: A balanced plan which should be implemented as soon as possible to prevent opportunistic development in the "interegum".

Change To Plan:

Legally Compliant?: Not Specified

Full Reference: S - 65245 - 8588 - PM/SC/2/H - None

65678 Support

Respondent: Mr Robert Culshaw [8609]

Agent: N/A

Summary: I strongly support the modifications to the Local Plan, including the 500 extra homes.

I urge SCDC to press for early approval of this excellent and balanced Local Plan.

Change To Plan:

Legally Compliant?: Not Specified

Full Reference: S - 65678 - 8609 - PM/SC/2/H - None

## 65682 Support

**Respondent:** Dr Shane Lawrence [19183]

**Agent:** N/A

**Summary:** The recognition and incorporation of the PPG Guidance issued on 6/3/2014 after the previous Plan submission date meant that the overall housing figure and land allocation rose from 19,000 to 19,337-19,500 for the 2011-2031 period.

The activities of SCDC together with City Deal mean that both the actual allocation of this 19,500 can be considered to be appreciatively 95% complete due to the following developments - Waterbeach, Bourn Airfield, Northstowe, Madingly Road, Trumpington Meadows with a further contribution from the 2 Newmarket Road areas.

The fact that the figure of 19,500 is over 90% allocated means that small village developments are not needed to accomplish this figure and should not be considered for approval for development.

Change To Plan:

Legally Compliant?: Not Specified

Full Reference: S - 65682 - 19183 - PM/SC/2/H - None

## 65699 Support

**Respondent:** The Taylor Family & Countryside Properties (UK) Ltd [19841]

**Agent:** Andrew Martin - Planning Limited (Mr Andrew Martin) [16509]

**Summary:** We support the proposed amendment of new homes from 19,000 to 19,500, including affordable housing and gypsy and traveller pitches. This is consistent with the NPPF that requires Councils to meet objectively assessed housing needs. This reflects the findings of Peter Brett Associates in November 2015 that identifies that the housing requirement for Cambridge does not need to change and that for South Cambridgeshire it should be 19,337 instead of 19,000 in the submitted Local Plan. The modification to change the housing requirement to 19,500 will go half way to incorporating the commitment through City Deal to provide an additional 1000 dwellings on rural exception sites.

Change To Plan:

Legally Compliant?: Not Specified

Full Reference: S - 65699 - 19841 - PM/SC/2/H - None

## 65972 Support

**Respondent:** Hallmark Hotels (Bar Hill) Ltd [25472]

**Agent:** CgMs (Matthew Roe) [25471]

**Summary:** We agree with the modification and the associated increase in housing supply target to meet the increase in objectively assessed need.

Change To Plan:

Legally Compliant?: Not Specified

Full Reference: S - 65972 - 25472 - PM/SC/2/H - None

## 66124 Support

**Respondent:** Fulbourn Parish Council (Mr Graham Cone ) [25279]

**Agent:** N/A

**Summary:** We are happy with the proposed modifications set out in the document giving a good balance to housing and employment.

Change To Plan:

Legally Compliant?: Not Specified

Full Reference: S - 66124 - 25279 - PM/SC/2/H - None

**65312 Object**                      **Respondent:** Barratt Eastern Counties and the North West Cambridge Consortium of Landowners [17788]                      **Agent:**    **BIDWELLS LLP (MISS MARCIA WHITEHEAD) [25328]**

Summary: We object to the Proposed Modification to Paragraph 2.34 increasing the Council's housing target by 500 homes to 19,500 dwellings. The Further Evidence in relation to the OAN to which the Proposed Modification refers is flawed and fails to fully consider economic trends.

Consequently, the Council's housing requirement is not founded on robust evidence prepared in a manner compliant with the NPPF and PPG. The Inspectors' concerns have not been fully addressed and the Council's Housing target still does not meet the OAN. The Proposed Modifications are therefore unsound as they are not:

- \* positively prepared;
- \* justified;
- \* consistent with National Policy.

Change To Plan: The proposed housing requirement referred to in the Proposed Modifications to Paragraph 2.34 should be increased and that further amendments should be made to the proposed wording of the paragraph to reflect this.

In our previous Matter 3 Written Statement we stated that the housing target should be at least 24,400 dwellings for South Cambridgeshire which we maintain is still the case.

It is considered that this revised approach would enable the Council to meet the objectively assessed housing needs for Cambridge in full and boost significantly the supply of housing in accordance with the requirements of Government guidance in the NPPF paragraphs 47 and 159. As such, this will ensure that the Plan is Sound.

Legally Compliant?: No

Full Reference: O - 65312 - 17788 - PM/SC/2/I - i, ii, iv

**65477 Object**                      **Respondent:** Bidwells (Miss Marcia Whitehead) [17324]                      **Agent:**    **Bidwells LLP (Alison Barnes) [25318]**

Summary: Bidwells object to the Proposed Modification to Paragraph 2.34 increasing the Council's housing target by 500 homes to 19,500 dwellings. Further Evidence in relation to the OAN to which the Proposed Modification refers is flawed and fails to fully consider economic trends.

The Council's housing requirement is not founded on robust evidence prepared in a manner compliant with the NPPF and PPG. The Inspectors' concerns have not been fully addressed and the Council's Housing target still does not meet the OAN. The Proposed Modifications are therefore unsound as they are not:

- \* positively prepared;
- \* justified;
- \* consistent with National Policy.

Change To Plan: Bidwells therefore consider that the proposed housing requirement referred to in the Proposed Modifications to Paragraph 2.34 should be amended and increased and that further amendments should be made to the proposed wording of the paragraph to reflect this.

In our previous Matter 3 Written Statement we stated that the housing target should be at least 24,400 dwellings for South Cambridgeshire which we maintain is still the case.

It is considered that this revised approach would enable the Council to meet the objectively assessed housing needs for Cambridge in full and boost significantly the supply of housing in accordance with the requirements of Government guidance in the NPPF paragraphs 47 and 159. As such, this will ensure that the Plan is Sound.

Legally Compliant?: No

Full Reference: O - 65477 - 17324 - PM/SC/2/I - i, ii, iv

65527 Object

Respondent: Endurance Estates Limited [19174]

Agent: Bidwells LLP (Susan Chappell) [25316]

Summary: Endurance Estates object to the Proposed Modification to Paragraph 2.34 increasing the Council's housing target by 500 homes to 19,500 dwellings. The Further Evidence in relation to the OAN to which the Proposed Modification refers is flawed and fails to fully consider economic trends.

The Council's housing requirement is not founded on robust evidence prepared in a manner compliant with the NPPF and PPG. The Inspectors' concerns have not been fully addressed and the Council's Housing target still does not meet the OAN. The Proposed Modifications are unsound as they are not:

- \* positively prepared;
- \* justified;
- \* consistent with National Policy.

Change To Plan: Endurance Estates therefore consider that the proposed housing requirement referred to in the Proposed Modifications to Paragraph 2.34 should be amended and increased and that further amendments should be made to the proposed wording of the paragraph to reflect this.

In our previous Matter 3 Written Statement we stated that the housing target should be at least 24,400 dwellings for South Cambridgeshire which we maintain is still the case.

It is considered that this revised approach would enable the Council to meet the objectively assessed housing needs for Cambridge in full and boost significantly the supply of housing in accordance with the requirements of Government guidance in the NPPF paragraphs 47 and 159. As such, this will ensure that the Plan is Sound.

Legally Compliant?: No

Full Reference: O - 65527 - 19174 - PM/SC/2/I - i, ii, iv

65579 Object

Respondent: Unwins and Biggs [25382]

Agent: Bidwells LLP (Alison Barnes) [25318]

Summary: Unwins and Biggs object to the Proposed Modification to Paragraph 2.34 increasing the Council's housing target by 500 homes to 19,500 dwellings. The Further Evidence in relation to the OAN to which the Proposed Modification refers is flawed and fails to fully consider economic trends.

The Council's housing requirement is not founded on robust evidence prepared in a manner compliant with the NPPF and PPG. The Inspectors' concerns haven't been fully addressed and the Council's Housing target still does not meet the OAN. The Proposed Modifications are therefore unsound as they are not:

- \* positively prepared;
- \* justified;
- \* consistent with National Policy.

Change To Plan: Unwins and Biggs therefore consider that the proposed housing requirement referred to in the Proposed Modifications to Paragraph 2.34 should be amended and increased and that further amendments should be made to the proposed wording of the paragraph to reflect this.

In our previous Matter 3 Written Statement we stated that the housing target should be at least 24,400 dwellings for South Cambridgeshire which we maintain is still the case.

It is considered that this revised approach would enable the Council to meet the objectively assessed housing needs for Cambridge in full and boost significantly the supply of housing in accordance with the requirements of Government guidance in the NPPF paragraphs 47 and 159. As such, this will ensure that the Plan is Sound.

Legally Compliant?: No

Full Reference: O - 65579 - 25382 - PM/SC/2/I - i, ii, iv

65599 Object

Respondent: **Pembroke College & the Balaam Family [21173]**

Agent: **Bidwells LLP (Susan Chappell) [25316]**

Summary: Pembroke College & the Balaam Family object to Proposed Modification Para 2.34 increasing the Council's housing target by 500 homes to 19,500 dwellings. Further Evidence in relation to the OAN to which the Proposed Modification refers is flawed and fails to fully consider economic trends.

The Council's housing requirement is not founded on robust evidence prepared in a manner compliant with the NPPF and PPG. The Inspectors' concerns have not been fully addressed and the Council's Housing target still does not meet the OAN. Proposed Modifications are unsound as they are not:

- \* positively prepared;
- \* justified;
- \* consistent with National Policy.

Change To Plan: Pembroke College & the Balaam Family therefore consider that the proposed housing requirement referred to in the Proposed Modifications to Paragraph 2.34 should be amended and increased and that further amendments should be made to the proposed wording of the paragraph to reflect this.

In our previous Matter 3 Written Statement we stated that the housing target should be at least 24,400 dwellings for South Cambridgeshire which we maintain is still the case.

It is considered that this revised approach would enable the Council to meet the objectively assessed housing needs for Cambridge in full and boost significantly the supply of housing in accordance with the requirements of Government guidance in the NPPF paragraphs 47 and 159. As such, this will ensure that the Plan is Sound.

Legally Compliant?: No

Full Reference: O - 65599 - 21173 - PM/SC/2/I - i, ii, iv

65983 Object

Respondent: **Scott Properties [25474]**

Agent: **Barton Willmore (Lauren Dooley) [25473]**

Summary: Objectively Assessed Need: The PBA Study concludes that DCLG 2012 projections predict growth of 17,579 new dwellings in South Cambridgeshire. This is below the SHMA prediction. We would argue that the SHMA findings should not be readily dismissed in light of the DCLG predictions being lower, and that the prudent approach would be to take the higher figure set out in the SHMA.

Market Signals: We would argue that insufficient evidence has been put forward in the PBA Study to suggest that the 10% uplift should apply or is appropriate to South Cambridgeshire and that the uplift to take into account market signals should be applied to the SHMA prediction of 19,000 dwellings. If the uplift was agreed at 10%, the OAN in South Cambridgeshire would be 20,900 dwellings.

City Deal: The housing figure for South Cambridgeshire does not meet OAN plus the 1,000 units agreed through City Deal on rural exception sites.

Change To Plan:

Legally Compliant?: Not Specified

Full Reference: O - 65983 - 25474 - PM/SC/2/I - None

## 66009 Object

**Respondent: Commercial Estates Group [17653]**

**Agent: Nathaniel Lichfield & Partners (Mr Matthew Spry) [20555]**

Summary: CEG does not agree, for reasons set out in OAHN Technical Paper (Appendix 2) that Cambridge Sub Region Strategic Housing Market Assessment 2012 took an integrated approach to identification of need for additional jobs and homes in South Cambridgeshire over plan period.

Accompanying Technical Paper and CEGs detailed representations to Examination to date clearly demonstrate that an integrated approach to identification of need for additional jobs and homes results in a significantly higher Objectively Assessed Housing Need (OAHN) within the HMA.

CEG maintains, for reasons details in the accompanying OAHN Technical Paper, that Councils' latest OAHN does not take account of the full range of factors which should be taken into account when establishing the OAHN.

Relevant Attachment  
Cambridge South East 1.4 Section 2(a)-OAHN(2.2-2.13)  
Appendix 2(OAHN)

Change To Plan: Amend modification

Legally Compliant?: Not Specified

Full Reference: O - 66009 - 17653 - PM/SC/2/I - i, ii, iii, iv

## 66142 Object

**Respondent: North Barton Road Land Owners Group [21302]**

**Agent: Carter Jonas LLP (Brian Flynn) [17331]**

Summary: The PBA Report does not provide a guidance-compliant assessment of Objectively-Assessed Housing Need. It is flawed because it fails to consider:  
-The plans' economic aspirations and the level of housing provision necessary to support this;  
-Assumptions inherent in demographic modelling; and  
-land values as a market signal, which point to constrained residential land supply in Cambridge. This is in conflict with the PPG.

Relevant attachments:  
-Jan Representations OAN (25.01.16).pdf  
-North BRLOG LP Mods Jan 2016.pdf : Paragraphs 32 to 37.pdf

Change To Plan: e request that the housing target for South Cambridgeshire in Policy S/5 should be increased to 27,000 dwellings between 2011 and 2031. The unmet needs from Cambridge should be met within South Cambridgeshire through the DtC and added to the requirement in Draft SCLP.

Legally Compliant?: Not Specified

Full Reference: O - 66142 - 21302 - PM/SC/2/I - i, ii, iv

## 66148 Object

**Respondent: South Barton Road Land Owners Group [21301]**

**Agent: Carter Jonas LLP (Brian Flynn) [17331]**

Summary: Relevant paragraphs of supporting document: 17 to 22.

Do not agree with Objectively Assessed Housing Need - Further Evidence (prepared by Peter Brett Associates), which supports the modification for the following reasons:

\*It ignores the plans' economic aspirations and the level of housing provision necessary to support this;  
\*It fails to consider assumptions inherent in demographic modelling used on household formation rates;  
\*It does not consider land values as a market signal;  
\*It is dismissive of the affordable housing need.

The Plans' housing assumption will result in a deterioration of affordable housing, constrain economic growth and create a shortfall in housing delivery. 15,200 should be provided in Cambridge and 27,000 in South Cambridgeshire.

Change To Plan: We request that the housing target for South Cambridgeshire in Policy S/5 should be increased to 27,000 dwellings between 2011 and 2031. The unmet needs from Cambridge should be met within South Cambridgeshire through the DtC and added to the requirement in Draft SCLP.

Legally Compliant?: Not Specified

Full Reference: O - 66148 - 21301 - PM/SC/2/I - i, ii, iii, iv

66195 Object

Summary: On objective review of the Council's updated evidence base, MCA consider that the assessment of objective assessed housing need fails to meet with the requirements set out in the PPG.

From the evidence available we do not consider that the proposed increase of 500 homes would be sufficient to address the concerns raised by the Inspector. Rather the data shows a requirement for between 1,073 and 1,125 dwellings per annum.

Change To Plan: Amend modification

Legally Compliant?: Not Specified

Full Reference: O - 66195 - 3652 - PM/SC/2/I - i, iii, iv

Respondent: MCA Developments Limited [3652]

Agent: Barton Willmore (Mr Steven Kosky) [3212]

65700 Support

Summary: We support the Peter Brett Associates assessment in 2015 that took account of national planning guidance published after the submission of the Local Plan to consider issues around the latest national household projections, market signals and affordable housing. We agree that this provides a balance between jobs and homes across the HMA.

Change To Plan:

Legally Compliant?: Not Specified

Full Reference: S - 65700 - 19841 - PM/SC/2/I - None

Respondent: The Taylor Family & Countryside Properties (UK) Ltd [19841]

Agent: Andrew Martin - Planning Limited (Mr Andrew Martin) [16509]



**65313 Object**      **Respondent:** Barratt Eastern Counties and the North West Cambridge Consortium of Landowners [17788]      **Agent:** BIDWELLS LLP (MISS MARCIA WHITEHEAD) [25328]

Summary: We object to the Proposed Modification to Paragraph 2.37 increasing the Council's housing target by 500 homes to 19,500 dwellings. The Further Evidence in relation to the OAN to which the Proposed Modification refers is flawed and fails to fully consider economic trends.

Consequently, the Council's housing requirement is not founded on robust evidence prepared in a manner compliant with the NPPF and PPG. The Inspectors' concerns have not been fully addressed and the Council's Housing target still does not meet the OAN. The Proposed Modifications are therefore unsound as they are not:

- \* positively prepared;
- \* justified;
- \* consistent with National Policy.

Change To Plan: The proposed housing requirement referred to in the Proposed Modifications to Paragraph 2.37 should be increased and that further amendments should be made to the proposed wording of the paragraph to reflect this.

In our previous Matter 3 Written Statement we stated that the housing target should be at least 24,400 dwellings for South Cambridgeshire which we maintain is still the case.

It is considered that this revised approach would enable the Council to meet the objectively assessed housing needs for Cambridge in full and boost significantly the supply of housing in accordance with the requirements of Government guidance in the NPPF paragraphs 47 and 159. As such, this will ensure that the Plan is Sound.

Legally Compliant?: No

Full Reference: O - 65313 - 17788 - PM/SC/2/J - i, ii, iv

**65439 Object**      **Respondent:** Pigeon Land & LIH [25320]      **Agent:** CODE Development Planners Ltd (Ms Karen Beech) [25295]

Summary: The level of objectively assessed housing need has been under-estimated for:

1. The demographic projections have not been adjusted to take account of the assumption that household formation amongst younger households is suppressed.
2. Economic growth expectations have not been addressed so there is a misalignment between jobs and homes.
3. Significant key market signals; land values and past under delivery have not been considered.
4. No adjustment has been made to take account of the level of affordable housing need.
5. The full objectively assessed housing requirement for Cambridge is 15,200 dwellings and for South Cambridgeshire is 27,000 dwellings.

Relevant documents:

- \*GLHearn Report - Whole Document
- \*160125\_CSTpt.pdf - Executive summary; Section 1 - Introduction - para 1.1 to 1.6; Section 2 - OAHN & Housing Need - Section 2.1 (2.1.1 to 2.1.13); Section 7 - Conclusions - para 7.1 to 7.6

Change To Plan: In order to make the Local Plans sound in respect of objectively assessed housing needs, the housing requirement should be increased to reflect the full objectively assessed housing need resulting in a figure of 15,200 in Cambridge and 27,000 in South Cambridgeshire.

Legally Compliant?: Yes

Full Reference: O - 65439 - 25320 - PM/SC/2/J - i, ii, iii, iv

65481 Object

Respondent: Bidwells (Miss Marcia Whitehead) [17324]

Agent: Bidwells LLP (Alison Barnes) [25318]

Summary: Bidwells object to the Proposed Modification to Paragraph 2.37 increasing the Council's housing target by 500 homes to 19,500 dwellings. The Further Evidence in relation to the OAN to which the Proposed Modification refers is flawed and fails to fully consider economic trends.

The Council's housing requirement is not founded on robust evidence prepared in a manner compliant with the NPPF and PPG. The Inspectors' concerns have not been fully addressed and the Council's Housing target still does not meet the OAN. The Proposed Modifications are therefore unsound as they are not:

- \* positively prepared;
- \* justified;
- \* consistent with National Policy.

Change To Plan: Bidwells therefore consider that the proposed housing requirement referred to in the Proposed Modifications to Paragraph 2.37 should be amended and increased and that further amendments should be made to the proposed wording of the paragraph to reflect this.

In our previous Matter 3 Written Statement we stated that the housing target should be at least 24,400 dwellings for South Cambridgeshire which we maintain is still the case.

It is considered that this revised approach would enable the Council to meet the objectively assessed housing needs for Cambridge in full and boost significantly the supply of housing in accordance with the requirements of Government guidance in the NPPF paragraphs 47 and 159. As such, this will ensure that the Plan is Sound.

Legally Compliant?: No

Full Reference: O - 65481 - 17324 - PM/SC/2/J - i, ii, iv

65529 Object

Respondent: Endurance Estates Limited [19174]

Agent: Bidwells LLP (Susan Chappell) [25316]

Summary: Endurance Estates object to the Proposed Modification to Paragraph 2.37 increasing the Council's housing target by 500 homes to 19,500 dwellings. The Further Evidence in relation to the OAN to which the Proposed Modification refers is flawed and fails to fully consider economic trends.

The Council's housing requirement is not founded on robust evidence prepared in a manner compliant with the NPPF and PPG. The Inspectors' concerns have not been fully addressed and the Council's Housing target still does not meet the OAN. The Proposed Modifications are unsound as they are not:

- \* positively prepared;
- \* justified;
- \* consistent with National Policy.

Change To Plan: [Bidwells] therefore consider that the proposed housing requirement referred to in the Proposed Modifications to Paragraph 2.37 should be amended and increased and that further amendments should be made to the proposed wording of the paragraph to reflect this.

In our previous Matter 3 Written Statement we stated that the housing target should be at least 24,400 dwellings for South Cambridgeshire which we maintain is still the case.

It is considered that this revised approach would enable the Council to meet the objectively assessed housing needs for Cambridge in full and boost significantly the supply of housing in accordance with the requirements of Government guidance in the NPPF paragraphs 47 and 159. As such, this will ensure that the Plan is Sound.

Legally Compliant?: No

Full Reference: O - 65529 - 19174 - PM/SC/2/J - i, ii, iv

65600 Object

Respondent: Unwins and Biggs [25382]

Agent: Bidwells LLP (Alison Barnes) [25318]

Summary: Unwins and Biggs object to the Proposed Modification to Paragraph 2.37 increasing the Council's housing target by 500 homes to 19,500 dwellings. The Further Evidence in relation to the OAN to which the Proposed Modification refers is flawed and fails to fully consider economic trends.

The Council's housing requirement isn't founded on robust evidence prepared in a manner compliant with the NPPF and PPG. The Inspectors' concerns have not been fully addressed and the Council's Housing target still does not meet the OAN. The Proposed Modifications are therefore unsound as they aren't:

- \* positively prepared;
- \* justified;
- \* consistent with National Policy.

Change To Plan: Unwins and Biggs therefore consider that the proposed housing requirement referred to in the Proposed Modifications to Paragraph 2.37 should be amended and increased and that further amendments should be made to the proposed wording of the paragraph to reflect this.

In our previous Matter 3 Written Statement we stated that the housing target should be at least 24,400 dwellings for South Cambridgeshire which we maintain is still the case.

It is considered that this revised approach would enable the Council to meet the objectively assessed housing needs for Cambridge in full and boost significantly the supply of housing in accordance with the requirements of Government guidance in the NPPF paragraphs 47 and 159. As such, this will ensure that the Plan is Sound.

Legally Compliant?: No

Full Reference: O - 65600 - 25382 - PM/SC/2/J - i, ii, iv

65601 Object

Respondent: Pembroke College & the Balaam Family [21173]

Agent: Bidwells LLP (Susan Chappell) [25316]

Summary: Pembroke & the Balaam Family object to the Proposed Modification to Paragraph 2.37 increasing the Council's housing target by 500 homes to 19,500 dwellings. Further Evidence in relation to the OAN to which the Proposed Modification refers is flawed and fails to fully consider economic trends.

The Council's housing requirement is not founded on robust evidence prepared in a manner compliant with the NPPF and PPG. The Inspectors' concerns have not been fully addressed and the Council's Housing target still does not meet the OAN. The Proposed Modifications are unsound as they are not:

- \* positively prepared;
- \* justified;
- \* consistent with National Policy.

Change To Plan: Pembroke & the Balaam Family therefore consider that the proposed housing requirement referred to in the Proposed Modifications to Paragraph 2.37 should be amended and increased and that further amendments should be made to the proposed wording of the paragraph to reflect this.

In our previous Matter 3 Written Statement we stated that the housing target should be at least 24,400 dwellings for South Cambridgeshire which we maintain is still the case.

It is considered that this revised approach would enable the Council to meet the objectively assessed housing needs for Cambridge in full and boost significantly the supply of housing in accordance with the requirements of Government guidance in the NPPF paragraphs 47 and 159. As such, this will ensure that the Plan is Sound.

Legally Compliant?: No

Full Reference: O - 65601 - 21173 - PM/SC/2/J - i, ii, iv

## 65914 Object

**Respondent: The Quay Estate [25458]**

**Agent: Carter Jonas LLP (Mr Richard Seamark) [15727]**

Summary: An increase of only 500 dwellings would still be at the lower end of possible options, and as such would not be a positive outcome and would not boost significantly the supply of housing.

The housing target for South Cambridgeshire should be increased to a minimum of 21,500 dwellings (1,075 dpa), to meet unmet needs from Cambridge that cannot be accommodated within the City through the Duty to Cooperate process.

Appropriate adjustments should be made to comply with the requirements of Paragraphs 014 to 029 of the Planning Practice Guidance.

Change To Plan: We request that the housing target for South Cambridgeshire in Policy S/5 should be increased, to include meeting any unmet needs from Cambridge through the Duty to Cooperate process.

Legally Compliant?: Not Specified

Full Reference: O - 65914 - 25458 - PM/SC/2/J - i, ii, iii, iv

## 66010 Object

**Respondent: Commercial Estates Group [17653]**

**Agent: Nathaniel Lichfield & Partners (Mr Matthew Spry) [20555]**

Summary: CEG does not agree (reasons set out in OAHN Technical Paper) that Additional Assessment of OAHN provides balance between homes and jobs across HMA.

Clear evidence that proposed approach is not justified, effective or consistent with national planning policy.

Councils' own Sustainable Development Sequence identifies sustainable pattern of development which would provide balance between jobs and homes across HMA, but instead promote homes in locations which do not meet employment needs and consequently do not balance jobs proposed

Accompanying Technical Paper and detailed representations to Examination to date clearly demonstrate an integrated approach to identification of need for additional jobs and homes results in a significantly higher OAHN within HMA of 41,000, and this demands spatial pattern of development which focusses on edge of the City.

Relevant Attachment

Cambridge South East 1.4 Section 2

Appendix 2(OAHN), 4(Transport), 6(Sustainability Appraisal) and 7(Development Prospectus)

Change To Plan: Amend modification

Legally Compliant?: Not Specified

Full Reference: O - 66010 - 17653 - PM/SC/2/J - i, ii, iii, iv

## 66086 Object

**Respondent: Ely Diocesan Board of Finance [3062]**

**Agent: Carter Jonas LLP (Brian Flynn) [17331]**

Summary: Relevant sections of attached document: 7 to 14

In our opinion, an increase of only 500 dwellings would still be at the lower end of possible options, and as such would not be a positive outcome and would not boost significantly the supply of housing.

The housing target should be increased to a minimum of 21,500, with appropriate adjustments made to comply with the requirements of Paragraphs 014 to 029 of the NPPG and address the housing crisis and affordable housing shortage in Cambridge and South Cambridgeshire. More affordable housing is needed to make sustainable villages and to meet local needs.

We request that the housing target for South Cambridgeshire in Policy S/5 should be increased, to include meeting any unmet needs from Cambridge through the DtC process.

In addition, no account has been taken of the alignment between jobs and housing. The number of jobs proposed will not be supported by the proposed housing requirement.

Change To Plan: We request that the housing target for South Cambridgeshire in Policy S/5 should be increased, to include meeting any unmet needs from Cambridge through the DtC process.

Legally Compliant?: Not Specified

Full Reference: O - 66086 - 3062 - PM/SC/2/J - i, ii, iii, iv

## 66104 Object

**Respondent: Grosvenor Developments Ltd and USS [25482]**

**Agent: Savills (Mr Colin Campbell) [15804]**

Summary: Updated assessment of housing need is not considered to be appropriate evidence to justify the plan.

Cambridge prices stand 45% above the 2007/08, South Cambridgeshire are at +25%. In E&W prices are c2.5% above 2007/08 peak.

Canterbury and Uttlesford currently c20% above 2007 peak, and Eastleigh is c10% above. Eastleigh is not comparable to South Cambridgeshire. Canterbury is more appropriate for comparison with South Cambridgeshire.

South Cambridgeshire uplift should be significantly higher than 20% and a strong case that it should be higher than Canterbury.

Cambridge City significantly outstrips Canterbury. Uplift for market signals should be significantly higher than 30%.

Change To Plan: Amend modification

Legally Compliant?: Not Specified

Full Reference: O - 66104 - 25482 - PM/SC/2/J - i, ii, iii, iv

## 66143 Object

**Respondent: North Barton Road Land Owners Group [21302]**

**Agent: Carter Jonas LLP (Brian Flynn) [17331]**

Summary: The PBA Report does not provide a guidance-compliant assessment of Objectively-Assessed Housing Need. It is flawed because it fails to consider:

-The plans' economic aspirations and the level of housing provision necessary to support this;

-Assumptions inherent in demographic modelling; and

-land values as a market signal, which point to constrained residential land supply in Cambridge. This is in conflict with the PPG.

Relevant attachments:

-Jan Representations OAN (25.01.16).pdf

-North BRLOG LP Mods Jan 2016.pdf : Paragraphs 32 to 39.pdf

Change To Plan: e request that the housing target for South Cambridgeshire in Policy S/5 should be increased to 27,000 dwellings between 2011 and 2031. The unmet needs from Cambridge should be met within South Cambridgeshire through the DtC and added to the requirement in Draft SCLP.

Legally Compliant?: Not Specified

Full Reference: O - 66143 - 21302 - PM/SC/2/J - i, ii, iv

## 66149 Object

**Respondent: South Barton Road Land Owners Group [21301]**

**Agent: Carter Jonas LLP (Brian Flynn) [17331]**

Summary: Relevant paragraphs of supporting document: 17 to 20.

Do not agree with Objectively Assessed Housing Need - Further Evidence (prepared by Peter Brett Associates), which supports the modification for the following reasons:

\*It ignores the plans' economic aspirations and the level of housing provision necessary to support this;

\*It fails to consider assumptions inherent in demographic modelling used on household formation rates;

\*It does not consider land values as a market signal;

\*It is dismissive of the affordable housing need.

The Plans' housing assumption will result in a deterioration of affordable housing, constrain economic growth and create a shortfall in housing delivery. 15,200 should be provided in Cambridge and 27,000 in South Cambridgeshire.

Change To Plan: We request that the housing target for South Cambridgeshire in Policy S/5 should be increased to 27,000 dwellings between 2011 and 2031. The unmet needs from Cambridge should be met within South Cambridgeshire through the DtC and added to the requirement in Draft SCLP.

Legally Compliant?: Not Specified

Full Reference: O - 66149 - 21301 - PM/SC/2/J - i, ii, iii, iv

**66171 Object**

**Respondent: Great Shelford Ten Acres Limited [8948]**

**Agent: Bidwells (Mrs Stacey Rawlings) [3140]**

Summary: Great Shelford (Ten Acres) Ltd object to the Proposed Modification to Paragraph 2.37 increasing the Council's housing target by 500 homes to 19,500 dwellings. The Further Evidence in relation to the OAN to which the Proposed Modification refers is flawed and fails to fully consider economic trends. Consequently, the Council's housing requirement is not founded on robust evidence prepared in a manner compliant with the NPPF and PPG. The Inspectors' concerns have not been fully addressed and the Council's Housing target still does not meet the OAN. The Proposed Modifications are therefore unsound as they are not:

- \* positively prepared;
- \* justified;
- \* consistent with National Policy.

See attached documents:  
\* PM\_SC\_2\_J.pdf  
\* Critique of the Councils' OAN.pdf

Change To Plan: Summary of Changes  
Great Shelford (Ten Acres) therefore consider that the proposed housing requirement referred to in the Proposed Modifications to Paragraph 2.37 should be increased to 17,930 dwellings and that further amendments should be made to the proposed wording of the paragraph to reflect this.  
This revised approach would enable the Council to meet the objectively assessed housing needs for Cambridge in full and boost significantly the supply of housing in accordance with the requirements of the NPPF paragraphs 47 and 159 such that the Plan is Sound.

Legally Compliant?: Not Specified

Full Reference: O - 66171 - 8948 - PM/SC/2/J - i, ii, iii, iv

**65314 Object**

**Respondent:** Barratt Eastern Counties and the North West Cambridge Consortium of Landowners [17788] **Agent:** BIDWELLS LLP (MISS MARCIA WHITEHEAD) [25328]

Summary: We object to the Proposed Modification to Paragraph 2.37a increasing the Council's housing target by 500 homes to 19,500 dwellings. The Further Evidence in relation to the OAN to which the Proposed Modification refers is flawed and fails to fully consider economic trends.

Consequently, the Council's housing requirement is not founded on robust evidence prepared in a manner compliant with the NPPF and PPG. The Inspectors' concerns have not been fully addressed and the Council's Housing target still does not meet the OAN. The Proposed Modifications are therefore unsound as they are not:

- \* positively prepared;
- \* justified;
- \* consistent with National Policy.

Change To Plan: The proposed housing requirement referred to in the Proposed Modifications to Paragraph 2.37a should be increased and that further amendments should be made to the proposed wording of the paragraph to reflect this.

In our previous Matter 3 Written Statement we stated that the housing target should be at least 24,400 dwellings for South Cambridgeshire which we maintain is still the case.

It is considered that this revised approach would enable the Council to meet the objectively assessed housing needs for Cambridge in full and boost significantly the supply of housing in accordance with the requirements of Government guidance in the NPPF paragraphs 47 and 159. As such, this will ensure that the Plan is Sound.

Legally Compliant?: No

Full Reference: O - 65314 - 17788 - PM/SC/2/K - i, ii, iv

**65440 Object**

**Respondent:** Pigeon Land & LIH [25320]

**Agent:** CODE Development Planners Ltd (Ms Karen Beech) [25295]

- Summary: The level of objectively assessed housing need has been under-estimated for:
1. The demographic projections have not been adjusted to take account of the assumption that household formation amongst younger households is suppressed.
  2. Economic growth expectations have not been addressed so there is a misalignment between jobs and homes.
  3. Significant key market signals; land values and past under delivery have not been considered.
  4. No adjustment has been made to take account of the level of affordable housing need.
  5. The full objectively assessed housing requirement for Cambridge is 15,200 dwellings and for South Cambridgeshire is 27,000 dwellings.

Relevant documents:

\*GLHearn Report - Whole Document

\*160125\_CSTpt.pdf - Executive summary; Section 1 - Introduction - para 1.1 to 1.6; Section 2 - OAHN & Housing Need - Section 2.1 (2.1.1 to 2.1.13); Section 7 - Conclusions - para 7.1 to 7.6

Change To Plan: In order to make the Local Plans sound in respect of objectively assessed housing needs, the housing requirement should be increased to reflect the full objectively assessed housing need resulting in a figure of 15,200 in Cambridge and 27,000 in South Cambridgeshire.

Legally Compliant?: Yes

Full Reference: O - 65440 - 25320 - PM/SC/2/K - i, ii, iii, iv

65483 Object

Respondent: Bidwells (Miss Marcia Whitehead) [17324]

Agent: Bidwells LLP (Alison Barnes) [25318]

Summary: Bidwells object to the Proposed Modification to Paragraph 2.37a increasing the Council's housing target by 500 homes to 19,500 dwellings. The Further Evidence in relation to the OAN to which the Proposed Modification refers is flawed and fails to fully consider economic trends.

The Council's housing requirement is not founded on robust evidence prepared in a manner compliant with the NPPF and PPG. The Inspectors' concerns have not been fully addressed and the Council's Housing target still does not meet the OAN. The Proposed Modifications are therefore unsound as they are not:

- \* positively prepared;
- \* justified;
- \* consistent with National Policy.

Change To Plan: Bidwells therefore consider that the proposed housing requirement referred to in the Proposed Modifications to Paragraph 2.37a should be amended and increased and that further amendments should be made to the proposed wording of the paragraph to reflect this.

In our previous Matter 3 Written Statement we stated that the housing target should be at least 24,400 dwellings for South Cambridgeshire which we maintain is still the case.

It is considered that this revised approach would enable the Council to meet the objectively assessed housing needs for Cambridge in full and boost significantly the supply of housing in accordance with the requirements of Government guidance in the NPPF paragraphs 47 and 159. As such, this will ensure that the Plan is Sound.

Legally Compliant?: No

Full Reference: O - 65483 - 17324 - PM/SC/2/K - i, ii, iv

65532 Object

Respondent: Endurance Estates Limited [19174]

Agent: Bidwells LLP (Susan Chappell) [25316]

Summary: Endurance Estates object to the Proposed Modification to Paragraph 2.37a increasing the Council's housing target by 500 homes to 19,500 dwellings. The Further Evidence in relation to the OAN to which the Proposed Modification refers is flawed and fails to fully consider economic trends.

The Council's housing requirement is not founded on robust evidence prepared in a manner compliant with the NPPF and PPG. The Inspectors' concerns have not been fully addressed and the Council's Housing target still does not meet the OAN. The Proposed Modifications are unsound as they are not:

- \* positively prepared;
- \* justified;
- \* consistent with National Policy.

Change To Plan: Endurance Estates therefore consider that the proposed housing requirement referred to in the Proposed Modifications to Paragraph 2.37a should be amended and increased and that further amendments should be made to the proposed wording of the paragraph to reflect this.

In our previous Matter 3 Written Statement we stated that the housing target should be at least 24,400 dwellings for South Cambridgeshire which we maintain is still the case.

It is considered that this revised approach would enable the Council to meet the objectively assessed housing needs for Cambridge in full and boost significantly the supply of housing in accordance with the requirements of Government guidance in the NPPF paragraphs 47 and 159. As such, this will ensure that the Plan is Sound.

Legally Compliant?: No

Full Reference: O - 65532 - 19174 - PM/SC/2/K - i, ii, iv



65602 Object

Respondent: Unwins and Biggs [25382]

Agent: Bidwells LLP (Alison Barnes) [25318]

Summary: Unwins and Biggs object to the Proposed Modification to Paragraph 2.37a increasing the Council's housing target by 500 homes to 19,500 dwellings. The Further Evidence in relation to the OAN to which the Proposed Modification refers is flawed and fails to fully consider economic trends.

The Council's housing requirement isn't founded on robust evidence prepared in a manner compliant with the NPPF and PPG. The Inspectors' concerns have not been fully addressed and the Council's Housing target still doesn't meet the OAN. The Proposed Modifications are therefore unsound as they are not:

- \* positively prepared;
- \* justified;
- \* consistent with National Policy.

Change To Plan: Unwins and Biggs therefore consider that the proposed housing requirement referred to in the Proposed Modifications to Paragraph 2.37a should be amended and increased and that further amendments should be made to the proposed wording of the paragraph to reflect this.

In our previous Matter 3 Written Statement we stated that the housing target should be at least 24,400 dwellings for South Cambridgeshire which we maintain is still the case.

It is considered that this revised approach would enable the Council to meet the objectively assessed housing needs for Cambridge in full and boost significantly the supply of housing in accordance with the requirements of Government guidance in the NPPF paragraphs 47 and 159. As such, this will ensure that the Plan is Sound.

Legally Compliant?: No

Full Reference: O - 65602 - 25382 - PM/SC/2/K - i, ii, iv

65603 Object

Respondent: Pembroke College & the Balaam Family [21173]

Agent: Bidwells LLP (Susan Chappell) [25316]

Summary: Pembroke & the Balaam Family object to the Proposed Modification to Para 2.37a increasing the Council's housing target by 500 homes to 19,500 dwellings. The Further Evidence in relation to the OAN to which the Proposed Modification refers is flawed and fails to fully consider economic trends.

The Council's housing requirement is not founded on robust evidence prepared in a manner compliant with the NPPF and PPG. The Inspectors' concerns have not been fully addressed and the Council's Housing target still does not meet the OAN. Proposed Modifications are unsound as they are not:

- \* positively prepared;
- \* justified;
- \* consistent with National Policy.

Change To Plan: Pembroke College & the Balaam Family therefore consider that the proposed housing requirement referred to in the Proposed Modifications to Paragraph 2.37a should be amended and increased and that further amendments should be made to the proposed wording of the paragraph to reflect this.

In our previous Matter 3 Written Statement we stated that the housing target should be at least 24,400 dwellings for South Cambridgeshire which we maintain is still the case.

It is considered that this revised approach would enable the Council to meet the objectively assessed housing needs for Cambridge in full and boost significantly the supply of housing in accordance with the requirements of Government guidance in the NPPF paragraphs 47 and 159. As such, this will ensure that the Plan is Sound.

Legally Compliant?: No

Full Reference: O - 65603 - 21173 - PM/SC/2/K - i, ii, iv

## 65984 Object

**Respondent:** Scott Properties [25474]

**Agent:** Barton Willmore (Lauren Dooley) [25473]

**Summary:** Objectively Assessed Need: The PBA Study concludes that DCLG 2012 projections predict growth of 17,579 new dwellings in South Cambridgeshire. This is below the SHMA prediction. We would argue that the SHMA findings should not be readily dismissed in light of the DCLG predictions being lower, and that the prudent approach would be to take the higher figure set out in the SHMA.

**Market Signals:** We would argue that insufficient evidence has been put forward in the PBA Study to suggest that the 10% uplift should apply or is appropriate to South Cambridgeshire and that the uplift to take into account market signals should be applied to the SHMA prediction of 19,000 dwellings. If the uplift was agreed at 10%, the OAN in South Cambridgeshire would be 20,900 dwellings.

**City Deal:** The housing figure for South Cambridgeshire does not meet OAN plus the 1,000 units agreed through City Deal on rural exception sites.

**Change To Plan:**

**Legally Compliant?:** Not Specified

**Full Reference:** O - 65984 - 25474 - PM/SC/2/K - None

## 66011 Object

**Respondent:** Commercial Estates Group [17653]

**Agent:** Nathaniel Lichfield & Partners (Mr Matthew Spry) [20555]

**Summary:** CEG does not agree (reasons set out in the OAHN Technical Paper) that Additional Assessment of OAHN provides a balance between homes and jobs across the HMA.

Clear evidence that the proposed approach is not justified, effective or consistent with national planning policy.

Councils' own Sustainable Development Sequence identifies sustainable pattern of development which would provide balance between jobs and homes across HMA, but instead promote homes in locations which do not meet employment needs and consequently do not balance jobs proposed

Accompanying Technical Paper and detailed representations to Examination to date clearly demonstrate an integrated approach to identification of need for additional jobs and homes results in a significantly higher OAHN within HMA of 41,000, and this demands spatial pattern of development which focusses on edge of the City.

Relevant Attachment  
Cambridge South East 1.4 Section 2(a)-OAHN(2.2-2.13)  
Appendix 2(OAHN)

**Change To Plan:** Amend modification

**Legally Compliant?:** Not Specified

**Full Reference:** O - 66011 - 17653 - PM/SC/2/K - i, ii, iii, iv

## 66032 Object

**Respondent:** Martin Grant Homes Ltd & Harcourt Developments (UK) Ltd [21709]

**Agent:** Savills (Mr Andrew Raven) [18884]

**Summary:** Proposals promoted by MGH / Harcourt at North Cambourne are not reliant on housing numbers in the Local Plan being increased. However, Savills has prepared new evidence on housing need, specifically focused on market indicators (as contained in our written statement in relation to Matter 3), attached at Appendix 1. This new evidence further underlines the fact that the level of uplift in housing numbers proposed by the Councils is insufficient.

**Change To Plan:**

**Legally Compliant?:** No

**Full Reference:** O - 66032 - 21709 - PM/SC/2/K - i, ii, iii, iv

## 66080 Object

**Respondent:** Hopkins Homes Limited (Robert Eburne) [25413]

**Agent:** N/A

**Summary:** Reassessed objectively assessed need (OAN) for housing growth to 2031 has been slightly increased from 19,000 to 19,500. The 19,000 figure is a rounded figure projected from 19,337. Whilst this increase is cautiously welcomed along with the movement on transferring housing distribution from New Settlements to villages, we consider that there continues to be an over-reliance on meeting development needs in New Settlements. This remains a limiting factor for sustained delivery of much needed new homes throughout the plan period.

**Change To Plan:** Amend modification

**Legally Compliant?:** Not Specified

**Full Reference:** O - 66080 - 25413 - PM/SC/2/K - i, ii, iii, iv

## 66105 Object

**Respondent: Grosvenor Developments Ltd and USS [25482]**

**Agent: Savills (Mr Colin Campbell) [15804]**

Summary: Updated assessment of housing need is not considered to be appropriate evidence to justify the plan.

Cambridge prices stand 45% above the 2007/08, South Cambridgeshire are at +25%. In E&W prices are c2.5% above 2007/08 peak.

Canterbury and Uttlesford currently c20% above 2007 peak, and Eastleigh is c10% above. Eastleigh is not comparable to South Cambridgeshire. Canterbury is more appropriate for comparison with South Cambridgeshire.

South Cambridgeshire uplift should be significantly higher than 20% and a strong case that it should be higher than Canterbury.

Cambridge City significantly outstrips Canterbury. Uplift for market signals should be significantly higher than 30%.

Change To Plan: Amend modification

Legally Compliant?: Not Specified

Full Reference: O - 66105 - 25482 - PM/SC/2/K - i, ii, iii, iv

## 66144 Object

**Respondent: North Barton Road Land Owners Group [21302]**

**Agent: Carter Jonas LLP (Brian Flynn) [17331]**

Summary: The PBA Report does not provide a guidance-compliant assessment of Objectively-Assessed Housing Need. It is flawed because it fails to consider:

-The plans' economic aspirations and the level of housing provision necessary to support this;

-Assumptions inherent in demographic modelling; and

-land values as a market signal, which point to constrained residential land supply in Cambridge. This is in conflict with the PPG.

Relevant attachments:

-Jan Representations OAN (25.01.16).pdf

-North BRLOG LP Mods Jan 2016.pdf : Paragraphs 32 to 41.pdf

Change To Plan: We request that the housing target for South Cambridgeshire in Policy S/5 should be increased to 27,000 dwellings between 2011 and 2031. The unmet needs from Cambridge should be met within South Cambridgeshire through the DtC and added to the requirement in Draft SCLP.

Legally Compliant?: Not Specified

Full Reference: O - 66144 - 21302 - PM/SC/2/K - i, ii, iv

## 66150 Object

**Respondent: South Barton Road Land Owners Group [21301]**

**Agent: Carter Jonas LLP (Brian Flynn) [17331]**

Summary: Relevant paragraphs of supporting document: 17-20 & 25-26.

Do not agree with Objectively Assessed Housing Need - Further Evidence (prepared by Peter Brett Associates), which supports the modification for the following reasons:

\*It ignores the plans' economic aspirations and the level of housing provision necessary to support this;

\*It fails to consider assumptions inherent in demographic modelling used on household formation rates;

\*It does not consider land values as a market signal;

\*It is dismissive of the affordable housing need.

The Plans' housing assumption will result in a deterioration of affordable housing, constrain economic growth and create a shortfall in housing delivery. 15,200 should be provided in Cambridge and 27,000 in South Cambridgeshire.

Change To Plan: We request that the housing target for South Cambridgeshire in Policy S/5 should be increased to 27,000 dwellings between 2011 and 2031. The unmet needs from Cambridge should be met within South Cambridgeshire through the DtC and added to the requirement in Draft SCLP.

Legally Compliant?: Not Specified

Full Reference: O - 66150 - 21301 - PM/SC/2/K - i, ii, iii, iv

## 66172 Object

**Respondent: Great Shelford Ten Acres Limited [8948]**

**Agent: Bidwells (Mrs Stacey Rawlings) [3140]**

Summary: Great Shelford (Ten Acres) object to the Proposed Modification to Paragraph 2.37a increasing the Council's housing target by 500 homes to 19,500 dwellings. The Further Evidence in relation to the OAN to which the Proposed Modification refers is flawed and fails to fully consider economic trends. Consequently, the Council's housing requirement is not founded on robust evidence prepared in a manner compliant with the NPPF and PPG. The Inspectors' concerns have not been fully addressed and the Council's Housing target still does not meet the OAN. The Proposed Modifications are therefore unsound as they are not:

- \* positively prepared;
- \* justified;
- \* consistent with National Policy.

See attached documents:

- \* PM\_SC\_2\_K.pdf
- \* Critique of the Councils' OAN.pdf

Change To Plan: We therefore consider that the proposed housing requirement referred to in the Proposed Modifications to Paragraph 2.37a should be increased to 17,930 dwellings and that further amendments should be made to the proposed wording of the paragraph to reflect this. This revised approach would enable the Council to meet the objectively assessed housing needs for Cambridge in full and boost significantly the supply of housing in accordance with the requirements of the NPPF paragraphs 47 and 159 such that the Plan is Sound.

Legally Compliant?: Not Specified

Full Reference: O - 66172 - 8948 - PM/SC/2/K - i, ii, iv

## 66196 Object

**Respondent: MCA Developments Limited [3652]**

**Agent: Barton Willmore (Mr Steven Kosky) [3212]**

Summary: On objective review of the Council's updated evidence base, MCA consider that the assessment of objective assessed housing need fails to meet with the requirements set out in the PPG.

From the evidence available we do not consider that the proposed increase of 500 homes would be sufficient to address the concerns raised by the Inspector. Rather the data shows a requirement for between 1,073 and 1,125 dwellings per annum.

Change To Plan: Amend modification

Legally Compliant?: Not Specified

Full Reference: O - 66196 - 3652 - PM/SC/2/K - i, iii, iv

## 65287 Support

**Respondent: Rustat Road Neighbourhood Association (Mr Roger Crabtree) [16745]**

**Agent: N/A**

Summary: It is helpful and re-assuring that the recent review comes to an almost identical conclusion on the number of needed new dwellings as the original plan.

Change To Plan:

Legally Compliant?: Not Specified

Full Reference: S - 65287 - 16745 - PM/SC/2/K - None

## 65288 Support

**Respondent: Rustat Road Neighbourhood Association (Mr Roger Crabtree) [16745]**

**Agent: N/A**

Summary: It is helpful and re-assuring that the recent review comes to an almost identical conclusion on the number of needed new dwellings as the original plan.

Change To Plan:

Legally Compliant?: Not Specified

Full Reference: S - 65288 - 16745 - PM/SC/2/K - None

## 65703 Support

**Respondent: The Taylor Family & Countryside Properties (UK) Ltd [19841]**

**Agent: Andrew Martin - Planning Limited (Mr Andrew Martin) [16509]**

Summary: We support the addition of a new paragraph after 2.37 confirming the figure of 19,337 homes and its rounding up to 19,500.

Change To Plan:

Legally Compliant?: Not Specified

Full Reference: S - 65703 - 19841 - PM/SC/2/K - None

**65936 Support**

**Respondent:** Cambridge Past Present and Future (Ms Stacey Weiser) [20942]

**Agent:** N/A

Summary: CambridgePPF believes that the additional independent technical evidence takes adequate account of both recent national guidance and market forces, and therefore provides a realistic basis for the planning of residential provision. We support the Council's projections of 19,337 new homes, rounded up to 19,500, for the plan period.

Change To Plan:

Legally Compliant?: Not Specified

Full Reference: S - 65936 - 20942 - PM/SC/2/K - None

**65315 Object**                      **Respondent:** Barratt Eastern Counties and the North West Cambridge Consortium of Landowners [17788]                      **Agent:**    BIDWELLS LLP (MISS MARCIA WHITEHEAD) [25328]

Summary: We object to the Proposed Modification to Paragraph 2.39 increasing the Council's housing target by 500 homes to 19,500 dwellings. The Further Evidence in relation to the OAN to which the Proposed Modification refers is flawed and fails to fully consider economic trends.

Consequently, the Council's housing requirement is not founded on robust evidence prepared in a manner compliant with the NPPF and PPG. The Inspectors' concerns have not been fully addressed and the Council's Housing target still does not meet the OAN. The Proposed Modifications are unsound as they are not:

- \* positively prepared;
- \* justified;
- \* consistent with National Policy.

Change To Plan: The proposed housing requirement referred to in the Proposed Modifications to Paragraph 2.39 should be increased and that amendments should be made to the proposed wording of the paragraph to reflect this.

In our previous Matter 3 Written Statement we stated that the housing target should be at least 24,400 dwellings for South Cambridgeshire which we maintain is still the case.

It is considered that this revised approach would enable the Council to meet the objectively assessed housing needs for Cambridge in full and boost significantly the supply of housing in accordance with the requirements of Government guidance in the NPPF paragraphs 47 and 159. As such, this will ensure that the Plan is Sound.

Legally Compliant?: No

Full Reference: O - 65315 - 17788 - PM/SC/2/L - i, ii, iv

**65444 Object**                      **Respondent:** Pigeon Land & LIH [25320]                      **Agent:**    CODE Development Planners Ltd (Ms Karen Beech) [25295]

- Summary: The level of objectively assessed housing need has been under-estimated for:
1. The demographic projections have not been adjusted to take account of the assumption that household formation amongst younger households is suppressed.
  2. Economic growth expectations have not been addressed so there is a misalignment between jobs and homes.
  3. Significant key market signals; land values and past under delivery have not been considered.
  4. No adjustment has been made to take account of the level of affordable housing need.
  5. The full objectively assessed housing requirement for Cambridge is 15,200 dwellings and for South Cambridgeshire is 27,000 dwellings.

Relevant documents:  
\*GLHearn Report - Whole Document  
\*160125\_CSTpt.pdf - Executive summary; Section 1 - Introduction - para 1.1 to 1.6; Section 2 - OAHN & Housing Need - Section 2.1 (2.1.1 to 2.1.13); Section 7 - Conclusions - para 7.1 to 7.6

Change To Plan: In order to make the Local Plans sound in respect of objectively assessed housing needs, the housing requirement should be increased to reflect the full objectively assessed housing need resulting in a figure of 15,200 in Cambridge and 27,000 in South Cambridgeshire.

Legally Compliant?: Yes

Full Reference: O - 65444 - 25320 - PM/SC/2/L - i, ii, iii, iv

65487 Object

Respondent: Bidwells (Miss Marcia Whitehead) [17324]

Agent: Bidwells LLP (Alison Barnes) [25318]

Summary: Bidwells object to the Proposed Modification to Paragraph 2.39 increasing the Council's housing target by 500 homes to 19,500 dwellings. The Further Evidence in relation to the OAN to which the Proposed Modification refers is flawed and fails to fully consider economic trends.

The Council's housing requirement is not founded on robust evidence prepared in a manner compliant with the NPPF and PPG. The Inspectors' concerns have not been fully addressed and the Council's Housing target still does not meet the OAN. The Proposed Modifications are therefore unsound as they are not:

- \* positively prepared;
- \* justified;
- \* consistent with National Policy.

Change To Plan: Bidwells therefore consider that the proposed housing requirement referred to in the Proposed Modifications to Paragraph 2.39 should be amended and increased and that amendments should be made to the proposed wording of the paragraph to reflect this.

In our previous Matter 3 Written Statement we stated that the housing target should be at least 24,400 dwellings for South Cambridgeshire which we maintain is still the case.

It is considered that this revised approach would enable the Council to meet the objectively assessed housing needs for Cambridge in full and boost significantly the supply of housing in accordance with the requirements of Government guidance in the NPPF paragraphs 47 and 159. As such, this will ensure that the Plan is Sound.

Legally Compliant?: No

Full Reference: O - 65487 - 17324 - PM/SC/2/L - i, ii, iv

65533 Object

Respondent: Endurance Estates Limited [19174]

Agent: Bidwells LLP (Susan Chappell) [25316]

Summary: Endurance Estates object to the Proposed Modification to Paragraph 2.39 increasing the Council's housing target by 500 homes to 19,500 dwellings. The Further Evidence in relation to the OAN to which the Proposed Modification refers is flawed and fails to fully consider economic trends.

The Council's housing requirement is not founded on robust evidence prepared in a manner compliant with the NPPF and PPG. The Inspectors' concerns have not been fully addressed and the Council's Housing target still does not meet the OAN. The Proposed Modifications are therefore unsound as they are not:

- \* positively prepared;
- \* justified;
- \* consistent with National Policy.

Change To Plan: Endurance Estates therefore consider that the proposed housing requirement referred to in the Proposed Modifications to Paragraph 2.39 should be amended and increased and that amendments should be made to the proposed wording of the paragraph to reflect this.

In our previous Matter 3 Written Statement we stated that the housing target should be at least 24,400 dwellings for South Cambridgeshire which we maintain is still the case.

It is considered that this revised approach would enable the Council to meet the objectively assessed housing needs for Cambridge in full and boost significantly the supply of housing in accordance with the requirements of Government guidance in the NPPF paragraphs 47 and 159. As such, this will ensure that the Plan is Sound.

Legally Compliant?: No

Full Reference: O - 65533 - 19174 - PM/SC/2/L - i, ii, iv

## 65605 Object

**Respondent: Unwins and Biggs [25382]**

**Agent: Bidwells LLP (Alison Barnes) [25318]**

Summary: Unwins and Biggs object to the Proposed Modification to Paragraph 2.39 increasing the Council's housing target by 500 homes to 19,500 dwellings. The Further Evidence in relation to the OAN to which the Proposed Modification refers is flawed and fails to fully consider economic trends.

The Council's housing requirement is not founded on robust evidence prepared in a manner compliant with the NPPF and PPG. The Inspectors' concerns haven't been fully addressed and the Council's Housing target still does not meet the OAN. The Proposed Modifications are therefore unsound as they are not:

- \* positively prepared;
- \* justified;
- \* consistent with National Policy.

Change To Plan: Unwins and Biggs therefore consider that the proposed housing requirement referred to in the Proposed Modifications to Paragraph 2.39 should be amended and increased and that amendments should be made to the proposed wording of the paragraph to reflect this.

In our previous Matter 3 Written Statement we stated that the housing target should be at least 24,400 dwellings for South Cambridgeshire which we maintain is still the case.

It is considered that this revised approach would enable the Council to meet the objectively assessed housing needs for Cambridge in full and boost significantly the supply of housing in accordance with the requirements of Government guidance in the NPPF paragraphs 47 and 159. As such, this will ensure that the Plan is Sound.

Legally Compliant?: No

Full Reference: O - 65605 - 25382 - PM/SC/2/L - i, ii, iv

## 65835 Object

**Respondent: CALA Homes (North Homes Counties) Ltd [25454]**

**Agent: Carter Jonas LLP (Brian Flynn) [17331]**

Summary: The proposed housing target is not a step change in housing delivery, but demonstrates that some identified housing sites are not delivered in accordance with the housing trajectory and that overall there is under-delivery against the housing requirement.

Change To Plan: We request that the housing target for South Cambridgeshire in Policy S/5 should be increased, to include meeting any unmet needs from Cambridge through the DtC process.

As requested in Modification PM/SC/2/R: Policy S/12, we request that a more robust assessment of housing delivery is undertaken and the housing trajectory is revised accordingly.

Legally Compliant?: Not Specified

Full Reference: O - 65835 - 25454 - PM/SC/2/L - i, ii, iv

## 65851 Object

**Respondent: Mr C Meadows [21155]**

**Agent: Carter Jonas LLP (Brian Flynn) [17331]**

Summary: The proposed housing target is not a step change in housing delivery, but demonstrates that some identified housing sites are not delivered in accordance with the housing trajectory and that overall there is under-delivery against the housing requirement.

Change To Plan: We request that the housing target for South Cambridgeshire in Policy S/5 should be increased, to include meeting any unmet needs from Cambridge through the DtC process.

As requested in Modification PM/SC/2/R: Policy S/12, we request that a more robust assessment of housing delivery is undertaken and the housing trajectory is revised accordingly.

Legally Compliant?: Not Specified

Full Reference: O - 65851 - 21155 - PM/SC/2/L - i, ii, iv



## 65985 Object

**Respondent: Scott Properties [25474]**

**Agent: Barton Willmore (Lauren Dooley) [25473]**

Summary: Objectively Assessed Need: The PBA Study concludes that DCLG 2012 projections predict growth of 17,579 new dwellings in South Cambridgeshire. This is below the SHMA prediction. We would argue that the SHMA findings should not be readily dismissed in light of the DCLG predictions being lower, and that the prudent approach would be to take the higher figure set out in the SHMA.

Market Signals: We would argue that insufficient evidence has been put forward in the PBA Study to suggest that the 10% uplift should apply or is appropriate to South Cambridgeshire and that the uplift to take into account market signals should be applied to the SHMA prediction of 19,000 dwellings. If the uplift was agreed at 10%, the OAN in South Cambridgeshire would be 20,900 dwellings.

City Deal: The housing figure for South Cambridgeshire does not meet OAN plus the 1,000 units agreed through City Deal on rural exception sites.

Change To Plan:

Legally Compliant?: Not Specified

Full Reference: O - 65985 - 25474 - PM/SC/2/L - None

## 66081 Object

**Respondent: Hopkins Homes Limited (Robert Eburne) [25413]**

**Agent: N/A**

Summary: Proposed Modifications suggest that the review of OAN leaves a residual number of homes to be allocated of 4,365 homes up to 2031. However, the suggested delivery rate of 975 homes per annum is substantially less than the old 2007 Core Strategy annualised target of 1176 which was persistently not achieved.

Change To Plan: Amend modification

Legally Compliant?: Not Specified

Full Reference: O - 66081 - 25413 - PM/SC/2/L - i, ii, iii, iv

## 66106 Object

**Respondent: Grosvenor Developments Ltd and USS [25482]**

**Agent: Savills (Mr Colin Campbell) [15804]**

Summary: Updated assessment of housing need is not considered to be appropriate evidence to justify the plan.

Cambridge prices stand 45% above the 2007/08, South Cambridgeshire are at +25%. In E&W prices are c2.5% above 2007/08 peak.

Canterbury and Uttlesford currently c20% above 2007 peak, and Eastleigh is c10% above. Eastleigh is not comparable to South Cambridgeshire. Canterbury is more appropriate for comparison with South Cambridgeshire.

South Cambridgeshire uplift should be significantly higher than 20% and a strong case that it should be higher than Canterbury.

Cambridge City significantly outstrips Canterbury. Uplift for market signals should be significantly higher than 30%.

Change To Plan: Amend modification

Legally Compliant?: Not Specified

Full Reference: O - 66106 - 25482 - PM/SC/2/L - i, ii, iii, iv

## 66145 Object

**Respondent:** North Barton Road Land Owners Group [21302]

**Agent:** Carter Jonas LLP (Brian Flynn) [17331]

**Summary:** The PBA Report does not provide a guidance-compliant assessment of Objectively-Assessed Housing Need. It is flawed because it fails to consider:  
-The plans' economic aspirations and the level of housing provision necessary to support this;  
-Assumptions inherent in demographic modelling; and  
-land values as a market signal, which point to constrained residential land supply in Cambridge. This is in conflict with the PPG.

Proposed housing target demonstrates identified housing sites not deliverable in accordance with the housing trajectory and under-delivery of housing requirement.

Relevant attachments:

-Jan Representations OAN (25.01.16).pdf

-North BRLOG LP Mods Jan 2016.pdf : Paragraphs 32 to 45.pdf

**Change To Plan:** We request that the housing target for South Cambridgeshire in Policy S/5 should be increased to 27,000 dwellings between 2011 and 2031. The unmet needs from Cambridge should be met within South Cambridgeshire through the DtC and added to the requirement in Draft SCLP.

The proposed housing target is not a step change in housing delivery, but demonstrates that some identified housing sites are not delivered in accordance with the housing trajectory and that overall there is under-delivery against the housing requirement.

**Legally Compliant?:** Not Specified

**Full Reference:** O - 66145 - 21302 - PM/SC/2/L - i, ii, iv

## 66158 Object

**Respondent:** Shelford Investments Ltd [21149]

**Agent:** Carter Jonas LLP (Brian Flynn) [17331]

**Summary:** Relevant paragraphs in supporting documents: 8 to 17

South Cambridgeshire's housing target would still be at the lower end of possible options. This would not result in a positive outcome or boost significantly the supply of housing.

The housing target for South Cambridgeshire should be increased to a minimum of 21,500 dwellings (1,075 dpa), although it was likely that the housing target would need to be higher to meet unmet needs from Cambridge.

Support the increase in housing target, but it should be higher to comply with paragraphs 014 to 029 of the NPPF.

The proposed housing target demonstrates that some identified housing sites are not delivered in accordance with the housing trajectory and that overall there is under-delivery against the housing requirement.

**Change To Plan:** We request that the housing target for South Cambridgeshire in Policy S/5 should be increased, to include meeting any unmet needs from Cambridge through the DtC process.

As requested in Modification PM/SC/2/R: Policy S/12, we request that a more robust assessment of housing delivery is undertaken and the housing trajectory is revised accordingly.

**Legally Compliant?:** Not Specified

**Full Reference:** O - 66158 - 21149 - PM/SC/2/L - i, ii, iv

## 66173 Object

**Respondent: Great Shelford Ten Acres Limited [8948]**

**Agent: Bidwells (Mrs Stacey Rawlings) [3140]**

Summary: We object to the Proposed Modification to Paragraph 2.34 increasing the Council's housing target by 500 homes to 19,500 dwellings. The Further Evidence in relation to the OAN to which the Proposed Modification refers is flawed and fails to fully consider economic trends. Consequently, the Council's housing requirement is not founded on robust evidence prepared in a manner compliant with the NPPF and PPG. The Inspectors' concerns have not been fully addressed and the Council's Housing target still does not meet the OAN. The Proposed Modifications are therefore unsound as they are not:

- \* positively prepared;
- \* justified;
- \* consistent with National Policy.

See attached documents:

- \* PM\_SC\_2\_L.pdf
- \* Critique of the Councils' OAN.pdf

Change To Plan: We therefore consider that the proposed housing requirement referred to in the Proposed Modifications to Paragraph 2.34 should be increased to 17,930 dwellings and that further amendments should be made to the proposed wording of the paragraph to reflect this. This revised approach would enable the Council to meet the objectively assessed housing needs for Cambridge in full and boost significantly the supply of housing in accordance with the requirements of the NPPF paragraphs 47 and 159 such that the Plan is Sound.

Legally Compliant?: Not Specified

Full Reference: O - 66173 - 8948 - PM/SC/2/L - i, ii, iv

## 66197 Object

**Respondent: MCA Developments Limited [3652]**

**Agent: Barton Willmore (Mr Steven Kosky) [3212]**

Summary: On objective review of the Council's updated evidence base, MCA consider that the assessment of objective assessed housing need fails to meet with the requirements set out in the PPG.

From the evidence available we do not consider that the proposed increase of 500 homes would be sufficient to address the concerns raised by the Inspector. Rather the data shows a requirement for between 1,073 and 1,125 dwellings per annum.

Change To Plan: Amend modification

Legally Compliant?: Not Specified

Full Reference: O - 66197 - 3652 - PM/SC/2/L - i, iii, iv

## 65704 Support

**Respondent: The Taylor Family & Countryside Properties (UK) Ltd [19841]**

**Agent: Andrew Martin - Planning Limited (Mr Andrew Martin) [16509]**

Summary: The provision of 19,500 new homes implies an average delivery rate of 975 homes per year, which is less than the Core Strategy 2007 - 1176 pa (2001 to 2011). A total of 7663 homes were built at an average of 766 pa, as a result of the reduced supply during the recession period. The new Local Plan therefore represents a consistent step change in housing delivery over a lengthy period.

Change To Plan:

Legally Compliant?: Not Specified

Full Reference: S - 65704 - 19841 - PM/SC/2/L - None

## 65937 Support

**Respondent: Cambridge Past Present and Future (Ms Stacey Weiser) [20942]**

**Agent: N/A**

Summary: CambridgePPF feel based on past performance, even in the pre-recession period, an average delivery rate of just under 1,000 new homes per annum would appear towards the top end of a realistic estimation of the Council's capacity. Higher than this would, in our opinion, be undeliverable.

Change To Plan:

Legally Compliant?: Not Specified

Full Reference: S - 65937 - 20942 - PM/SC/2/L - None

**65316 Object**                      **Respondent:** Barratt Eastern Counties and the North West Cambridge Consortium of Landowners [17788]                      **Agent:**    BIDWELLS LLP (MISS MARCIA WHITEHEAD) [25328]

Summary: We object to the Proposed Modification to Paragraph 2.39 increasing the Council's housing target by 500 homes to 19,500 dwellings. The Further Evidence in relation to the OAN to which the Proposed Modification refers is flawed and fails to fully consider economic trends.

Consequently, the Council's housing requirement is not founded on robust evidence prepared in a manner compliant with the NPPF and PPG. The Inspectors' concerns have not been fully addressed and the Council's Housing target still does not meet the OAN. The Proposed Modifications are therefore unsound as they are not:

- \* positively prepared;
- \* justified;
- \* consistent with National Policy.

Change To Plan: The Proposed Modifications to Paragraph 2.43 should be deleted and a further review of the Council's housing supply undertaken to ensure that only specific deliverable sites are included within the Council's housing land supply. Any subsequent resultant shortfall in the Council's housing land supply should be addressed through further allocations within the Plan.

It is considered that this revised approach would enable the Council to meet the objectively assessed housing needs for Cambridge in full and boost significantly the supply of housing in accordance with the requirements of Government guidance in the NPPF paragraphs 47 and 159. As such, this will ensure that the Plan is Sound.

Legally Compliant?: No

Full Reference: O - 65316 - 17788 - PM/SC/2/M - i, ii, iv

**65488 Object**                      **Respondent:** Bidwells (Miss Marcia Whitehead) [17324]                      **Agent:**    Bidwells LLP (Alison Barnes) [25318]

Summary: Bidwells object to the Proposed Modifications to Paragraph 2.40 since it is considered that the revised paragraph provides an inaccurate assessment of the level of housing supply within the District. The housing supply identified continues to rely on the development of a number of New Settlements over which there is considerable uncertainty, creating uncertainty as to whether the housing target of 19,500 dwellings will be delivered. As such, the Policy is:

- \* not positively prepared;
- \* not justified as it is not based on a robust evidence base;
- \* not consistent with National Policy within the NPPF.

Change To Plan: The Proposed Modifications to Paragraph 2.40 should be deleted and amended with a further review of the Council's housing supply undertaken to ensure that only specific deliverable sites are included within the Council's housing land supply. Any subsequent resultant shortfall in the Council's housing land supply should be addressed through further allocations within the Plan.

This revised approach would enable the Council to meet the objectively assessed housing needs for Cambridge in full and boost significantly the supply of housing in accordance with NPPF paragraphs 47 and 159. This will ensure that the Plan is Sound.

Legally Compliant?: No

Full Reference: O - 65488 - 17324 - PM/SC/2/M - i, ii, iv

## 65534 Object

**Respondent: Endurance Estates Limited [19174]**

**Agent: Bidwells LLP (Susan Chappell) [25316]**

Summary: Endurance Estates object to the Proposed Modifications to Paragraph 2.40 since it is considered that the revised paragraph provides an inaccurate assessment of the level of housing supply within the District. The housing supply identified continues to rely on the development of a number of New Settlements over which there is considerable uncertainty, creating uncertainty as to whether the housing target of 19,500 dwellings will be delivered. As such, the Policy is:

- \* not positively prepared;
- \* not justified as it is not based on a robust evidence base;
- \* not consistent with National Policy within the NPPF.

Change To Plan: The Proposed Modifications to Paragraph 2.40 should be deleted and amended with a further review of the Council's housing supply undertaken to ensure that only specific deliverable sites are included within the Council's housing land supply. Any subsequent resultant shortfall in the Council's housing land supply should be addressed through further allocations within the Plan.

This revised approach would enable the Council to meet the objectively assessed housing needs for Cambridge in full and boost significantly the supply of housing in accordance with NPPF paragraphs 47 and 159. This will ensure that the Plan is Sound.

Legally Compliant?: No

Full Reference: O - 65534 - 19174 - PM/SC/2/M - i, ii, iv

## 65570 Object

**Respondent: Pigeon Land & LIH [25320]**

**Agent: CODE Development Planners Ltd (Ms Karen Beech) [25295]**

Summary: We do not consider that Cambridge City and South Cambridgeshire should have a joint housing trajectory.

South Cambridgeshire and Cambridge City have separate local plans and should therefore in our view have separate housing trajectories.

This was confirmed by the inspector who considered two planning appeals at Waterbeach and said in the decision letter, dated 25 June 2014, that a joint housing trajectory would not be the correct approach.

Relevant documents:160125\_CSTpt.pdf

Executive summary

Section 1 - Introduction - para 1.1 to 1.6

Section 2 - OAHN & Housing Delivery - section 2.2 - para 2.2.1 to 2.2.5

Section 4 - Overall Development Strategy - para 4.1 to 4.5

Section 7 - Conclusions - para 7.1 to 7.6

Change To Plan: Given that Cambridge City and South Cambridgeshire are preparing separate Local Plans, each should have their own housing trajectory.

Legally Compliant?: Yes

Full Reference: O - 65570 - 25320 - PM/SC/2/M - i, ii, iii

## 65604 Object

**Respondent: Pembroke College & the Balaam Family [21173]**

**Agent: Bidwells LLP (Susan Chappell) [25316]**

Summary: Pembroke College & the Balaam Family object to Proposed Modifications to Paragraph 2.40 since it is considered that the revised paragraph provides an inaccurate assessment of the level of housing supply within the District. The housing supply identified continues to rely on the development of a number of New Settlements over which there is considerable uncertainty, creating uncertainty as to whether the housing target of 19,500 dwellings will be delivered. As such, the Policy is:

- \* not positively prepared;
- \* not justified as it is not based on a robust evidence base;
- \* not consistent with National Policy within the NPPF.

Change To Plan: The Proposed Modifications to Paragraph 2.40 should be deleted and amended with a further review of the Council's housing supply undertaken to ensure that only specific deliverable sites are included within the Council's housing land supply. Any subsequent resultant shortfall in the Council's housing land supply should be addressed through further allocations within the Plan.

This revised approach would enable the Council to meet the objectively assessed housing needs for Cambridge in full and boost significantly the supply of housing in accordance with NPPF paragraphs 47 and 159. This will ensure that the Plan is Sound.

Legally Compliant?: No

Full Reference: O - 65604 - 21173 - PM/SC/2/M - i, ii, iv

## 65609 Object

**Respondent: Unwins and Biggs [25382]**

**Agent: Bidwells LLP (Alison Barnes) [25318]**

Summary: Unwins and Biggs object to the Proposed Modifications to Paragraph 2.40 since it is considered that the revised paragraph provides an inaccurate assessment of the level of housing supply within the District. The housing supply identified continues to rely on the development of a number of New Settlements over which there is considerable uncertainty, creating uncertainty as to whether the housing target of 19,500 dwellings will be delivered. As such, the Policy is:

- \* not positively prepared;
- \* not justified as it is not based on a robust evidence base;
- \* not consistent with National Policy within the NPPF.

Change To Plan: The Proposed Modifications to Paragraph 2.40 should be deleted and amended with a further review of the Council's housing supply undertaken to ensure that only specific deliverable sites are included within the Council's housing land supply. Any subsequent resultant shortfall in the Council's housing land supply should be addressed through further allocations within the Plan.

This revised approach would enable the Council to meet the objectively assessed housing needs for Cambridge in full and boost significantly the supply of housing in accordance with NPPF paragraphs 47 and 159. This will ensure that the Plan is Sound.

Legally Compliant?: No

Full Reference: O - 65609 - 25382 - PM/SC/2/M - i, ii, iv

## 65986 Object

**Respondent: Scott Properties [25474]**

**Agent: Barton Willmore (Lauren Dooley) [25473]**

Summary: Housing Land Supply: Two recent appeals in South Cambridgeshire concluded that the Council could only demonstrate either 3.5 years or 3.9 years depending on whether housing supply was calculated using the Sedgefield or Liverpool method. The further work carried out on Objectively Assessed Need by PBA has a minimal impact on the Council's position. The Council's current claimed position as set out in the November 2015 Housing Land Supply Paper suggest that they can demonstrate a five year housing land supply under only one scenario (Liverpool with 5% buffer - 5.1 years). This provides a strong indication that additional housing is required to meet OAN.

Change To Plan:

Legally Compliant?: Not Specified

Full Reference: O - 65986 - 25474 - PM/SC/2/M - None

## 66174 Object

**Respondent: Great Shelford Ten Acres Limited [8948]**

**Agent: Bidwells (Mrs Stacey Rawlings) [3140]**

Summary: We object to the Proposed Modifications to Paragraph 2.40 since it is considered that the revised paragraph provides an inaccurate assessment of the level of housing supply within the District. The housing supply identified continues to rely on the development of a number of New Settlements over which there is considerable uncertainty, creating uncertainty as to whether the housing target of 19,500 dwellings will be delivered. As such, the Policy is:

- \* not positively prepared;
- \* not justified as it is not based on a robust evidence base;
- \* not consistent with National Policy within the NPPF.

See attached documents:

- \* PM\_SC\_2\_M.pdf
- \* Critique of the Councils' Housing Land Supply.pdf

Change To Plan: The Proposed Modifications to Paragraph 2.40 should be deleted and amended with a further review of the Council's housing supply undertaken to ensure that only specific deliverable sites are included within the Council's housing land supply. Any subsequent resultant shortfall in the Council's housing land supply should be addressed through further allocations within the Plan.

This revised approach would enable the Council to meet the objectively assessed housing needs for Cambridge in full and boost significantly the supply of housing in accordance with NPPF paragraphs 47 and 159. This will ensure that the Plan is Sound.

Legally Compliant?: Not Specified

Full Reference: O - 66174 - 8948 - PM/SC/2/M - i, ii, iv

## 66199 Object

**Respondent: MCA Developments Limited [3652]**

**Agent: Barton Willmore (Mr Steven Kosky) [3212]**

Summary: On objective review of the Council's updated evidence base, MCA consider that the assessment of objective assessed housing need fails to meet with the requirements set out in the PPG.

From the evidence available we do not consider that the proposed increase of 500 homes would be sufficient to address the concerns raised by the Inspector. Rather the data shows a requirement for between 1,073 and 1,125 dwellings per annum.

Change To Plan: Amend modification

Legally Compliant?: Not Specified

Full Reference: O - 66199 - 3652 - PM/SC/2/M - i, iii, iv

## 66214 Object

**Respondent: North Barton Road Land Owners Group [21302]**

**Agent: Carter Jonas LLP (Brian Flynn) [17331]**

Summary: SCDC's predictions of housing completions will be accurate; historic monitoring data demonstrates lower than predicted completion rates.

There is a consistent history that less housing is actually delivered than is predicted to be delivered.

The undersupply position is worsening year on year.

The Council's housing trajectory should be treated with caution and is highly likely to be overly optimistic.

Relevant attachments:

- Jan Representations OAN (25.01.16).pdf
- Table South Cambridgeshire Housing Predictions Recorded Completions.pdf
- North BRLOG LP Mods Jan 2016.pdf : Paragraphs 59 to 60.pdf

Change To Plan: We request that all references to a joint housing trajectory are deleted from Draft SCLP. We request that a more robust assessment of the sites is undertaken and the housing trajectory is adjusted accordingly.

Legally Compliant?: Not Specified

Full Reference: O - 66214 - 21302 - PM/SC/2/M - i, ii, iv

## 65705 Support

**Respondent: The Taylor Family & Countryside Properties (UK) Ltd [19841]**

**Agent: Andrew Martin - Planning Limited (Mr Andrew Martin) [16509]**

Summary: We support the update to paragraph 2.40 on the latest housing land supply position.

Change To Plan:

Legally Compliant?: Not Specified

Full Reference: S - 65705 - 19841 - PM/SC/2/M - None

**65973 Support**

**Respondent:** Hallmark Hotels (Bar Hill) Ltd [25472]

**Agent:** CgMs (Matthew Roe) [25471]

Summary: We support modification PM/SC/2M to deliver an additional 4365 dwellings alongside existing allocations.

Whilst our client supports the fact that Housing supply has been increased in the Proposed Modifications to the Local Plan, we do not believe it goes far enough to meet the housing need across the two administrative boundaries particularly given the under-delivery of housing in particular settlements as identified by PM/SC/2/M. This modification identifies that further land needs to be identified to deliver an additional 4,365 new homes alongside the existing allocations; unallocated sites with planning permission and the council's forecast windfall allowance.

Change To Plan:

Legally Compliant?: Not Specified

Full Reference: S - 65973 - 25472 - PM/SC/2/M - None



**65124 Object**                      **Respondent: Dr Roger Sewell [25099]**                      **Agent: N/A**

Summary: There should be more emphasis on encouraging employment at satellite sites outside Cambridge and less emphasis on providing more houses.

Change To Plan: Changing housing allocation to employment allocation, giving a net reduction in housing provision.

Legally Compliant?: Yes

Full Reference: O - 65124 - 25099 - PM/SC/2/N - ii

**65132 Object**                      **Respondent: Mr Simon Long [25139]**                      **Agent: N/A**

Summary: No practical solutions have been proposed either in the original submission or this modification to cope with the huge increase in commuter traffic that would result if the large developments at Bourn Airfield and West Cambourne are allowed.

Change To Plan: It is clearly not possible for sustainable transport routes to be provided for the developments at Bourn Airfield and West Cambourne - no large-scale development should be permitted at either of these sites.

Legally Compliant?: No

Full Reference: O - 65132 - 25139 - PM/SC/2/N - i, ii, iii, iv

**65253 Object**                      **Respondent: Dr C Grant [22459]**                      **Agent: N/A**

Summary: It is not appropriate to reschedule the speed of development of the proposed settlement at Waterbeach when no supporting infrastructure requirements have been attached to the "flexibility" proposed. In the original plan only a small proportion of the development would be done by 2030 giving an opportunity for appropriate infrastructure improvements to be constructed before development. So e). should have specific requirements related to infrastructure attached to any rescheduling including road improvements eg A10, sewage and surface drainage capacity (provided on site), additional requirements for education, and other facilities to be in place before major development.

Change To Plan: That the Waterbeach new tow is not developed before appropriate infrastructure improvements have been made.

Legally Compliant?: Yes

Full Reference: O - 65253 - 22459 - PM/SC/2/N - i

**65278 Object**                      **Respondent: Dr Neil Blair [16668]**                      **Agent: N/A**

Summary: Allowing both Bourn Airfield Development and West Cambourne developments to proceed concurrently would cause traffic and environmental issues for local residents. It would be better to construct West Cambourne first, then when complete build on Bourn Airfield.

Creating the new village at Bourn Airfield will cause further traffic issues on already busy roads. The employment sites will be located on the edge of Cambridge and it will not be possible to get to these areas by public transport. This will create many extra car journeys, especially along Madingley Road or through the existing villages.

Change To Plan: The original wording of the document to be retained.  
Bourn Airfield not to be used for housing and housing constructed nearer to the places of work i.e. edge of Cambridge.

Legally Compliant?: Yes

Full Reference: O - 65278 - 16668 - PM/SC/2/N - i, ii, iii

## 65343 Object

**Respondent: Mr Brian Williams [17286]**

**Agent: N/A**

Summary: SCDC have ignored all the indications from the Inspectors that 3 new settlements will be difficult to sustain, they have removed any attempt to stage delivery essentially planning a free for all and thus no guarantee that any of them will be successful. This also contradicts the 1st core principle of the National Planning Policy Framework which says all development should be. Plan Lead.  
Further the policy of New settlements is clearly the most expensive way to increase housing provision and as there is no quantifiable increase in benefit for the occupiers it must be a waste of Taxpayers money.

The delivery of New settlements in particular but also the Revised LDF as a whole must be considered unsound due to the significant potential for underfunding as identified in the Infrastructure Delivery Study Update 2013.  
Cambridge has a predicted finance shortfall of £207m over the plan period. And South Cambs £1.3 Billion. The plan needs to show how this gap may be closed before any commitment is given to commence development in already congested areas.

There is still no recognised strategy for the delivery of transport infrastructure in the A10 corridor.  
Any advance of development at Waterbeach or Bourn may put at risk the delivery and success of Northstowe which is the flagship settlement of SCDC.

The New Settlement policy must develop the A428 and A14 corridors before the A10 Corridor as 428 cost much less to deliver and it makes no sense to commit £428M infrastructure cost for Waterbeach (Approx £100Million < Bourn and Nstowe combined) until we confirm the Plan on track to deliver by 2031.  
Also Northstowe is well advanced in planning, has the advantage of the Guided Bus from Huntingdon to Cambridge which can easily extend to call at the new Chesterton Station. Bourn has access to the A428 which unlike the A10 has capacity.

Change To Plan: Have clear plan which allows the development of Northstowe to at least 50% and provide additional housing with the green belt are close to Cambridge

Legally Compliant?: Yes

Full Reference: O - 65343 - 17286 - PM/SC/2/N - i, ii, iii, iv

## 65347 Object

**Respondent: Mr Brian Williams [17286]**

**Agent: N/A**

Summary: The New Settlement policy must develop the A428 and A14 corridors before the A10 Corridor as 428 cost much less to deliver and it makes no sense to commit £428M infrastructure cost for Waterbeach (Approx £100Million < Bourn and Nstowe combined) until we confirm the Plan on track to deliver by 2031.  
Also Northstowe is well advanced in planning, has the advantage of the Guided Bus from Huntingdon to Cambridge which can easily extend to call at the new Chesterton Station. Bourn has access to the A428 which unlike the A10 has capacity.

Change To Plan: No Change

Legally Compliant?: Yes

Full Reference: O - 65347 - 17286 - PM/SC/2/N - i, ii, iii, iv

## 65354 Object

**Respondent: Mr Brian Williams [17286]**

**Agent: N/A**

Summary: There is still no recognised strategy for the delivery of transport infrastructure in the A10 corridor.  
Any advance of development at Waterbeach or Bourn may put at risk the delivery and success of Northstowe which is the flagship settlement of SCDC.

Change To Plan: No Change

Legally Compliant?: Yes

Full Reference: O - 65354 - 17286 - PM/SC/2/N - i, ii, iii, iv

## 65355 Object

**Respondent: Mr Brian Williams [17286]**

**Agent: N/A**

Summary: The delivery of New settlements in particular but also the Revised LDF as a whole must be considered unsound due to the significant potential for underfunding as identified in the Infrastructure Delivery Study Update 2013.  
Cambridge has a predicted finance shortfall of £207m over the plan period. And South Cambs £1.3 Billion. The plan needs to show how this gap may be closed before any commitment is given to commence development in already congested areas.

Change To Plan: No Change to Modification

Legally Compliant?: Yes

Full Reference: O - 65355 - 17286 - PM/SC/2/N - i, ii, iii, iv

## 65394 Object

**Respondent:** Dr Neil Blair [16668]

**Agent:** N/A

**Summary:** Creating the new village at Bourn Airfield will cause further traffic issues on already busy roads. The employment sites will be located on the edge of Cambridge and it will not be possible to get to these areas by public transport. This will create many extra car journeys, especially along Madingley Road or through the existing villages.

**Change To Plan:** Bourn Airfield not to be used for housing and housing constructed nearer to the places of work i.e. edge of Cambridge.

**Legally Compliant?:** Yes

**Full Reference:** O - 65394 - 16668 - PM/SC/2/N - i, ii, iii

## 65401 Object

**Respondent:** Lorraine Rogers [25350]

**Agent:** N/A

**Summary:** The infrastructure for this proposal needs to be in place.

**Change To Plan:** The plan needs to be phased for sustainable growth.

**Legally Compliant?:** No

**Full Reference:** O - 65401 - 25350 - PM/SC/2/N - iii

## 65424 Object

**Respondent:** Mrs Sally Hildrew [23248]

**Agent:** N/A

**Summary:** New development sites such as Bourn Airfield and West Cambourne will add to the level of unsustainable modes of transport already evident following the Cambourne Development.

The sites are too far from major employment areas. Nor does the proposed fixed bus route provide sustainable transport into the major employment areas.

**Change To Plan:** No development should be allowed to be exempt from planning practice guidance.

**Legally Compliant?:** Yes

**Full Reference:** O - 65424 - 23248 - PM/SC/2/N - i, ii, iv

## 65451 Object

**Respondent:** Pigeon Land & LIH [25320]

**Agent:** CODE Development Planners Ltd (Ms Karen Beech) [25295]

**Summary:** 1. Seeking to bring forward the delivery of Waterbeach 2022 is not realistic given the amount of required infrastructure, the timescales that will be needed to acquire third party land for the infrastructure and the funding gap for this infrastructure, which was previously discussed at the examination but still remains despite the 2015 updated background technical reports.  
2. Development at Bourn Airfield is not sustainable and improvements to public transport infrastructure will only bring about a 6-7% modal shift resulting in a significant increase in car journeys as residents seek to access work, services and facilities in Cambridge.

**Relevant documents:**160125\_CSTpt.pdf

**Executive summary**

Section 1 - Introduction - para 1.1 to 1.6

Section 2 - OAHN & Housing Delivery - section 2.2 - para 2.2.1 to 2.2.5

Section 4 - Overall Development Strategy - para 4.1 to 4.5

Section 7 - Conclusions - para 7.1 to 7.6

**Change To Plan:** We consider that the proposed allocation at Bourn Airfield should be deleted.

The total number of dwellings from Waterbeach during the plan period should reduce from 2,050 to 1,100 and the start date for the development should be realistic. We estimated realistic commencement in our objections to the submission Local Plan as 2028/29 to take account of the significant highway and public transport infrastructure improvements required.

**Legally Compliant?:** Yes

**Full Reference:** O - 65451 - 25320 - PM/SC/2/N - i, ii, iii

## 65733 Object

**Respondent:** Mrs Jane Williams [24698]

**Agent:** N/A

Summary: Object for the following reasons:

\*Unrestricted build at Waterbeach New Town by 2031 is not sustainable or viable.

\*Waterbeach village is a Minor Rural Centre/Better Served Village.

\*Infrastructure not in place. A10 over capacity. Doctors/School already at capacity.

\*Overbearing on existing village development, on landowners/promoters working together landscape and ecology issues, where will build start on SS/5

\*Separation.

\*Develop Northstowe first.

Change To Plan:

Legally Compliant?: Not Specified

Full Reference: O - 65733 - 24698 - PM/SC/2/N - i, ii, iii, iv

## 65773 Object

**Respondent:** John Nesfield Bucknall [21134]

**Agent:** N/A

Summary: Cambridge and South Cambridgeshire Local Plans - Proposed Modifications - We have previously submitted our observations and these still stand. All of the above proposals have interactive consequences culminating in existing rural settlements, from Hardwick to St Neots, being overrun. Bourn, once set in a green and pleasant land is already a prime example.

Change To Plan:

Legally Compliant?: Not Specified

Full Reference: O - 65773 - 21134 - PM/SC/2/N - None

## 65832 Object

**Respondent:** The Taylor Family & Countryside Properties (UK) Ltd [19841]

**Agent:** Andrew Martin - Planning Limited (Mr Andrew Martin) [16509]

Summary: We wish to comment on the Viability Update (October 2015):

Paragraph 2.5.4: this paragraph explains how they have blended the "20% profit on the market units plus 6% profit on the affordable units" into a single profit percentage which has been used in their appraisals. It appears that the calculation assumes that both the private and the affordable units are the same average size. The schedules in Appendix I suggest (as we would expect) that the affordable units are smaller. If the calculation is adjusted to allow for the differential in average unit size the example given of a blended 17.1% margin at £3,050/sqft & 40% affordable would increase to 17.7%.

The list of general assumptions in Appendix I states that the Finance Rate for both build and land should be 7.0%, however the appraisals seem to state that a figure of 6.5% has been used. To cover likely finance costs over a full economic cycle the 7.0% figure should be used.

Change To Plan:

Legally Compliant?: Not Specified

Full Reference: O - 65832 - 19841 - PM/SC/2/N - None

## 65833 Object

**Respondent:** Leonard Martin [18145]

**Agent:** N/A

Summary: This submission considers relevant first principles and comparative assessment work that needs to be done in order to determine which broad spatial options would represent the most sustainable pattern of development. It considers further work earlier required by the Inspectorate, in particular transport modelling report.

More and better evidence is still required. The further work is inadequate.

Proposed pattern of development and other plan content cannot be judged to be sound.

Suggest the root cause is high level disconnect between local transport and land use planning despite being inextricably linked. This is last opportunity to remove this disconnect and adopt an evidence-led decision-making process.

Change To Plan:

Legally Compliant?: Not Specified

Full Reference: O - 65833 - 18145 - PM/SC/2/N - None

## 65878 Object

**Respondent: Waterbeach Parish Council (Liz Jones) [17084]**

**Agent: N/A**

Summary: SCDC ignored Inspectors that 3 new settlements difficult to sustain, removed staged delivery and no guarantee any will be successful. Contradicts 1st core principle of NPPF - all development should be Plan Led.

New settlements most expensive way to increase housing provision - no increase in benefit for occupiers waste of Taxpayers money.

Develop in A428 and A14 corridors before A10 as cost less to deliver - £428M infrastructure for Waterbeach (£100M more than Bourn and Northstowe combined).

Northstowe well advanced, has Guided Bus which can call at new Chesterton Station. Bourn access to A428, unlike A10, has capacity for traffic growth.

No recognised strategy for delivery of transport infrastructure in A10 corridor.

Any advance of development at Waterbeach or Bourn may put at risk delivery and success of Northstowe which is flagship settlement.

Waterbeach PC undertook their own survey locally and received 242 returned questionnaires; the responses and summary are attached as evidence.

Change To Plan:

Legally Compliant?: Not Specified

Full Reference: O - 65878 - 17084 - PM/SC/2/N - None

## 65882 Object

**Respondent: Waterbeach Parish Council (Liz Jones) [17084]**

**Agent: N/A**

Summary: The delivery of New settlements in particular but also the Revised LDF as a whole must be considered unsound due to the significant potential for underfunding as identified in the Infrastructure Delivery Study Update 2013.

Cambridge has a predicted finance shortfall of £207m over the plan period.

And South Cambs £1.3 Billion.

The plan need to show how this gap may be closed before any commitment is given to commence development in already congested area's.

Waterbeach PC undertook their own survey locally and received 242 returned questionnaires; the responses and summary are attached as evidence.

Change To Plan:

Legally Compliant?: Not Specified

Full Reference: O - 65882 - 17084 - PM/SC/2/N - None

## 65910 Object

**Respondent: Mr Henry d'Abo [2433]**

**Agent: N/A**

Summary: Responding to modifications in light of contents of Government's Rural Productivity Plan - priorities for growing rural economy and need to increase availability of housing in rural areas. Intend to restore Estate to former glory. Wish to develop high tech engineering spaces on brownfield sites combined with some low cost housing.

Support proposed modifications but they do not reflect emerging changes in national planning policy included in consultation on NPPF, Spending Review, Autumn Statement 2015 and Housing and Planning Bill; Rural Productivity Plan.

Object to changes to Policy S/6 being confined to bullet 3 and not to wording of 4 too. Change to policy does not reflect approach described in emerging Government guidance.

Change To Plan:

Legally Compliant?: Not Specified

Full Reference: O - 65910 - 2433 - PM/SC/2/N - iv

## 65938 Object

**Respondent: Cambridge Past Present and Future (Ms Stacey Weiser) [20942]**

**Agent: N/A**

Summary: Concerns about sustainability of new village at Bourn Airfield. 3,500 homes does not achieve size and scale to generate a reasonable degree of self-sufficiency in terms of new employment, retail or recreational facilities. Will be dependent on Cambridge. Could degenerate into dormitory. Will compete with Cambourne. Housing might be best re-located to Cambourne so it becomes more self-sufficient.

Accept need for 3,500 homes but propose they are allocated to a Greater Cambourne Area Action Plan, drawn more widely than our Airfield AAP to include whole of Cambourne, including West Cambourne, Bourn Airfield, and proposed Harbourn area to north of A428. Enlarged AAP will enable more detailed study to be undertaken of most sustainable form of development in this area.

Change To Plan: Amend modification

Legally Compliant?: Not Specified

Full Reference: O - 65938 - 20942 - PM/SC/2/N - ii

## 65954 Object

**Respondent: Bloor Homes Eastern [16420]**

**Agent: Pegasus Planning Group (Nicky Parsons) [15818]**

Summary: Provides flexibility but does not address new settlements reliance on infrastructure; significant funding gap. Plan remains ineffective; no certainty new settlements can be delivered as planned, or at all within plan period.

Revised Housing Trajectory indicates Waterbeach starts from 2022; within year of Bourn Airfield and four of Cambourne West; both rely on infrastructure enhancement along A428. Two significant infrastructure packages required around same time; competing pressures on funding and resources.

A10 corridor enhancements not until at least 2023. Trajectory indicates development without necessary infrastructure projects having started. City Deal Programme and LTTS optimistic.

Development Strategy Update suggests interim measures could be taken to alleviate pressure on infrastructure; no detail.

Change to strategy necessary; additional sites in villages. Boost delivery earlier and without substantial infrastructure. Sites at Swavesey and Over well-connected with Guided Busway and good range of local facilities.

Change To Plan: Therefore, given that it remains uncertain whether the significant infrastructure necessary to support the new settlements can come forward in accordance with the Local Plan's timescales, the proposed modification does not address the ineffectiveness of the Plan. We request that additional sites are allocated in rural areas where they can contribute towards the achievement of sustainable development and where they can benefit from pre-existing infrastructure and services such as the Guided Busway.

Legally Compliant?: Not Specified

Full Reference: O - 65954 - 16420 - PM/SC/2/N - None

## 65976 Object

**Respondent: Hallmark Hotels (Bar Hill) Ltd [25472]**

**Agent: CgMs (Matthew Roe) [25471]**

Summary: Proposed modification should make clear the specific location of targeted housing delivery in order to meet the identified increase in housing supply and promote other village sites that are in need of housing. Housing should thus be promoted in suitable villages in South Cambridgeshire and we would encourage a specific policy to be drafted in regards to residential development in Bar Hill.

We recommend that the Local Plan supports the provision of housing within the existing villages in South Cambridgeshire and in particular those which are accessible to the City centre and offer a broad range of facilities. We would encourage a policy to be drafted which promoted sustainable housing development in suitable villages in South Cambridgeshire. We further recommend that policy wording is needed on windfall sites, in particular to allow sustainable sites outside of the development boundaries to come forward for new homes.

Change To Plan:

Legally Compliant?: Not Specified

Full Reference: O - 65976 - 25472 - PM/SC/2/N - None

## 66012 Object

**Respondent: Commercial Estates Group [17653]**

**Agent: Nathaniel Lichfield & Partners (Mr Matthew Spry) [20555]**

Summary: Plans clearly identified a Sustainable Development Sequence which recognises sustainability benefits of location in and on edge of Cambridge are greater than for New Settlements and Villages. Modification allows more homes in less sustainable locations, and earlier in plan period.

We maintain (reasons in earlier representations) development at Bourn Airfield should not be supported and Waterbeach should occur only once development has taken place in more sustainable locations.

Proposed deletions allowing unsustainable development to proceed at greater rate, not justified, effective or consistent with national planning policy and should not be supported.

Representation is supported by Technical Papers on Transport and Infrastructure (Appendices 4 and 5). Papers provide critique of latest assessments and sets out reasons why proposed transport strategy and infrastructure will not adequately support growth or deliver sustainable development.

Relevant Attachment

Cambridge South East 1.4 Section 2, Section 3

All Appendix and 4(Transport), 5(Infrastructure), 6(SA Review) and 7(Development Prospectus) in particular.

Change To Plan: Amend modification

Legally Compliant?: Not Specified

Full Reference: O - 66012 - 17653 - PM/SC/2/N - i, ii, iii, iv

## 66046 Object

**Respondent: Gladman Developments (Nicole Penfold) [19878]**

**Agent: N/A**

Summary: Significant concerns with distribution of significant level of future housing growth to small number of strategic scale allocations. Significant over reliance on strategic sites and new settlements at expense of development in other sustainable locations. Whilst recognising they have important role to play and offer sustainability benefits, large schemes are likely to require significant infrastructure investment, and planning prior to delivery - longer lead in times. Modification suggests development could start sooner and deliver higher annual completion rates. Given findings of Hourigan Connolly research a cautious approach should be taken when considering lead-in times and delivery rates. Gladman consider South Cambridgeshire should allocate range of sites both small and large to allow flexibility of delivery and ensure the housing needs of various communities across district are met.

(May result in consequential changes to Mods PM/SC/2/Q, PM/SC/2/S, PM/SC/3/A, PM/SC/3/H)

Change To Plan:

Legally Compliant?: Not Specified

Full Reference: O - 66046 - 19878 - PM/SC/2/N - None

## 66082 Object

**Respondent: Hopkins Homes Limited (Robert Eburne) [25413]**

**Agent: N/A**

Summary: Object to reliance on New Settlements notwithstanding has been some movement towards growth in Rural Centres.

Proposed modifications fail to provide certainty about delivery. To guarantee delivery and de-risk delivery strategy while maximising growth earlier in plan period and partly accommodate past non delivery - allocate small to medium sites in villages with less propensity for delay, infrastructure constraints and technical complexity. Allocation of site SC255 would provide certainty, as first homes could be delivered by May 2018.

NPPF (Paras 54-55) and NPPG clear rural areas should be responsive to local circumstances and plan development to reflect local needs, particularly affordable housing, and enhance or maintain vitality of rural communities. Avoid blanket policies restricting development in some settlements and preventing settlements expanding should be avoided unless supported by robust evidence.

Change To Plan: Amend modification

Legally Compliant?: Not Specified

Full Reference: O - 66082 - 25413 - PM/SC/2/N - i, ii, iii, iv

## 66115 Object

**Respondent: Grosvenor Developments Ltd and USS [25482]**

**Agent: Savills (Mr Colin Campbell) [15804]**

Summary: It is not considered realistic that these major developments can start any earlier or that they will deliver higher rates of development.

A realistic approach needs to be taken to the delivery of such major sites.

Delays have happened with Northstowe whilst there has been only one competing "new settlement". This strategy provides for three further "new settlements" all to be delivered at the same time as Northstowe. There is no evidence that such high rates of delivery can be achieved and sustained on 4 new settlements all within 12 miles of each other.

Change To Plan: Delete modification

Legally Compliant?: Not Specified

Full Reference: O - 66115 - 25482 - PM/SC/2/N - i, ii, iii, iv

## 66182 Object

**Respondent: Histon & Impington Parish Council (Ms Chelsea Presland) [20953]**

**Agent: N/A**

Summary: Response does not strongly indicate the infrastructure deficit that already exists. City and SCDC commissioned consultants that indicate currently of the order of £billions. Adding new dwellings with only some of required infrastructure increases overall deficit. The more new houses the greater deficit. This must place a constraint on number of new houses, demand notwithstanding and indicates different measures are required to reduce demand once this limit is reached.

Repeat concern over any proposals for significant development in Cottenham resulting in extra load on, already overloaded, B1049 through Histon & Impington. Critical junctions at Histon Green and A14 are significantly over capacity in morning peak, leading to extensive traffic queues. Also exacerbates air quality issues.

Change To Plan: Amend modification

Legally Compliant?: Not Specified

Full Reference: O - 66182 - 20953 - PM/SC/2/N - ii, iii

## 66184 Object

**Respondent: Histon & Impington Parish Council (Ms Chelsea Presland) [20953]**

**Agent: N/A**

Summary: Local developers citing lack of skilled trades as slowing developments. Plan calls for faster rate of building than currently achieved.

Shortage of housing to match economic growth elevates prices. SCDC policies must mitigate profit to developers by delaying building. Otherwise, even if plan has requisite sites to meet demand, and planning permissions forthcoming, will be under-performance in delivery.

Placing of new housing - two spatial considerations. Cambridge North station provides for commuting to London from settlements along guided bus. Capacity will be challenged once Northstowe complete. New jobs on Biomedical Campus and west Cambridge. Need sites to west, south and east of Cambridge with good access to new employment sites: less competition by London commuters and will provide new housing for new working inhabitants of Cambridge sub area.

Change To Plan: Amend modification

Legally Compliant?: Not Specified

Full Reference: O - 66184 - 20953 - PM/SC/2/N - i

## 66200 Object

**Respondent: MCA Developments Limited [3652]**

**Agent: Barton Willmore (Mr Steven Kosky) [3212]**

Summary: Bringing forward phasing of Bourn Airfield so significantly, will force both sites to compete for same market share within same timeframe. Market capacity has its own level and most likely outcome will be reduction in anticipated delivery rates of both sites, with no net gains to overall housing trajectory.

Bourn Airfield will directly compete with existing Cambourne for inward investment and other resources at critical time in Cambourne's development, as established new settlement looks to reach more sustainable critical mass.

Advocate phasing of Bourn Airfield left unchanged, so if Inspector finds in favour of this allocation, it will come on line later in Plan Period, when likely to be most needed and where it will not be prejudicial to successful completion of Cambourne

Change To Plan: Amend modification

Legally Compliant?: Not Specified

Full Reference: O - 66200 - 3652 - PM/SC/2/N - i, iii, iv



## 66216 Object

**Respondent: North Barton Road Land Owners Group [21302]**

**Agent: Carter Jonas LLP (Brian Flynn) [17331]**

Summary: Policy S/6 - object to Criteria f. Bourn Airfield.  
Uncertain delivery of housing and infrastructure at Bourn Airfield.  
Outstanding objection on behalf of North BRLOG to Policy S6 in respect of Bourn Airfield.  
New settlements do not deliver policy compliant levels of affordable housing, and we anticipate that a similar outcome would occur at Bourn Airfield.

Relevant attachments:  
-Jan Representations OAN (25.01.16).pdf  
-North BRLOG LP Mods Jan 2016.pdf : Paragraphs 69 to 76.pdf

Change To Plan: We request that the proposed new settlement at Bourn Airfield is deleted.

Legally Compliant?: Not Specified

Full Reference: O - 66216 - 21302 - PM/SC/2/N - i, ii, iv

## 65290 Support

**Respondent: Rustat Road Neighbourhood Association (Mr Roger Crabtree) [16745]**

**Agent: N/A**

Summary: We support the proposed earlier development of these sites.

Change To Plan:

Legally Compliant?: Not Specified

Full Reference: S - 65290 - 16745 - PM/SC/2/N - None

## 65590 Support

**Respondent: Anglian Water Services Limited (Sue Bull) [15648]**

**Agent: N/A**

Summary: 2.43 - Providing necessary infrastructure is in place to serve the proposed development Anglian Water would have no issue with the flexibility in the start date of delivery of new settlements.

Change To Plan:

Legally Compliant?: Not Specified

Full Reference: S - 65590 - 15648 - PM/SC/2/N - None

## 65707 Support

**Respondent: The Taylor Family & Countryside Properties (UK) Ltd [19841]**

**Agent: Andrew Martin - Planning Limited (Mr Andrew Martin) [16509]**

Summary: This modification proposes amendment to Part 3 of the Plan that relates to new strategic scale allocations.

We support the proposed modification that removes the restrictions on start dates and introduces flexibility by allowing higher annual rates of housing completions. This meets with the NPPF paragraph 153 and more generally, that requires Local Plans to provide a strategy that can 'respond flexibly to changing circumstances'.

Change To Plan:

Legally Compliant?: Not Specified

Full Reference: S - 65707 - 19841 - PM/SC/2/N - None

## 65731 Support

**Respondent:** RLW Estates [1284]

**Agent:** Boyer Planning (Matthew Clarke) [9069]

**Summary:** Support Council's Development Strategy Update November 2015 (RD/MC/060) and reinforced by Sustainability Appraisal Addendum Report November 2015 (RD/MC/020).

Support deletion at clause (e) - removal of phasing restrictions at Waterbeach new settlement and limit on numbers within Plan Period. Unnecessarily restrictive and incompatible with NPPF Para. 47.

Preparation of Development Framework, governed by series of Planning Performance Agreements between site promoters and SCDC.

Anticipate submission of planning applications in late 2016 and completions could occur 2020/21 / sooner. At least 4,300 dwellings by 2031 - earlier and higher level of development than cautious assumptions within latest housing trajectory.

Councils' reasons for proposed change supported. Represents more positive and flexible situation.

Change To Plan:

Legally Compliant?: Not Specified

Full Reference: S - 65731 - 1284 - PM/SC/2/N - None

## 65761 Support

**Respondent:** Urban & Civic [24293]

**Agent:** David Lock Associates (Darren Bell) [24750]

**Summary:** Support Development Strategy Update November 2015 and Sustainability Appraisal Addendum November 2015. Inclusion of Waterbeach new town, as part of balanced strategy is justified, sustainable and deliverable (evidence in Infrastructure Delivery Plan update November 2015 and Viability update report November 2015).

New settlements important in delivering economic and sustainable travel benefits - high quality public transport corridors. Can leverage additional investment and be catalysts to delivery, supported by City Deal. Overall benefits considered significant compared to piecemeal Green Belt releases at edge of Cambridge.

\* Whilst edge of Cambridge sites (CSRM report) have greater propensity to reduce car mode share within, situated within highly congested areas with limited scope to improve;

\* Waterbeach accessible for employment nodes and rail stations;

\* Waterbeach - opportunities to minimise traffic through sustainable travel & leverage in new investment.

Change To Plan:

Legally Compliant?: Not Specified

Full Reference: S - 65761 - 24293 - PM/SC/2/N - None

## 65774 Support

**Respondent:** Uttlesford District Council (Richard Fox) [25450]

**Agent:** N/A

**Summary:** Uttlesford District Council have no officer comments to make on the Modifications. This is subject to ratification at the Council's Planning Policy Working Group on 27/01/16.

Change To Plan:

Legally Compliant?: Not Specified

Full Reference: S - 65774 - 25450 - PM/SC/2/N - None

## 65777 Support

**Respondent:** North Hertfordshire District Council (Mr David Hill) [12057]

**Agent:** N/A

**Summary:** As with our previous responses to your plan we are of the view that from a neighbouring authority perspective and with the Duty to Cooperate in mind, there would not appear to be too much that would require detailed discussions.

The Proposed Modifications document is not changing the Local Plan and the associated growth strategy, rather clarifying a number of points and providing more detail where the inspector has identified specific issues, therefore, at this time North Hertfordshire District Council has nothing substantial to add to previous comments.

Change To Plan:

Legally Compliant?: Not Specified

Full Reference: S - 65777 - 12057 - PM/SC/2/N - None

**65788 Support**

**Respondent: Historic England (Mr David Grech) [23622]**

**Agent: N/A**

Summary: In respect of Housing Land Supply, Historic England has reviewed the revised housing allocation map (Figure 3.2) prepared by the Councils and again we do not wish to comment in detail on either the New Proposal site in the City or the New Proposal Site in SCDC.

Nor do we object to the main modifications proposed to the South Cambridgeshire Local Plan in respect of the Development Strategy as set out in paragraphs 2.42, 2.43, 2.44, 2.45 and 2.47. We positively support the main modification proposed to the South Cambridgeshire Local Plan in respect of the Development Strategy as set out in paragraph 2.46.

Change To Plan:

Legally Compliant?: Not Specified

Full Reference: S - 65788 - 23622 - PM/SC/2/N - None

**65134 Object**

**Respondent:** Cllr Hazel Smith [17292]

**Agent:** N/A

Summary: Object to taking this field: new employment site at Cambridge Biomedical Campus (Policy E/1B) in PM/SC/8/A, out of the Green Belt. This is an important field for 2 red list birds (yellowhammer, grey partridge) and has tall substantial hedges around it which must be protected. Choosing a field at random like this is bad practice: it is only 40m from Nine Wells Nature Reserve and should retain its full Green Belt protection. I have seen no evidence that extra employment land is needed in this area.

Change To Plan: Remove the proposal to build in this field.

Legally Compliant?: Yes

Full Reference: O - 65134 - 17292 - PM/SC/2/O - None

**65291 Object**

**Respondent:** Rustat Road Neighbourhood Association (Mr Roger Crabtree) [16745]

**Agent:** N/A

Summary: We strongly oppose the appropriation of this green belt land. The area of Green belt around the Gog Magog hills is a most important area of green belt. This proposed extension of the Biomedical campus will be highly visible from those hills. It is a well used area, and the proposed additional are is unacceptably near to the 9 Wells Nature Reserve, one of Cambridge's best loved areas at the edge of the city. This is a step to far. This proposal is in conflict with 2.17 and the development of this site will substantially harm the Green Belt

Change To Plan: Retain this site as green belt; if more employment space is needed for the Bio-medical campus, developers should consider building higher

Legally Compliant?: Yes

Full Reference: O - 65291 - 16745 - PM/SC/2/O - ii

**65364 Object**

**Respondent:** Trumpington Residents Association (Andrew Roberts) [5312]

**Agent:** N/A

Summary: The Trumpington Residents' Association objects to the proposed revision of Figure 2, with respect to the allocation of an employment site at the Cambridge Biomedical Campus (Policy E/1B). The modification is not justified, as the arguments about the value of this land to the Green Belt given in the Inner Green Belt Review 2015 are flawed.

Change To Plan: Deletion of the proposed modification which would allow an expansion of the Cambridge Biomedical Campus.

Legally Compliant?: Yes

Full Reference: O - 65364 - 5312 - PM/SC/2/O - ii, iv

**65415 Object**

**Respondent:** Pigeon Land & LIH [25320]

**Agent:** CODE Development Planners Ltd (Ms Karen Beech) [25295]

Summary: 1. Land south of CBC is provisionally allocated for employment but we are unable to find any evidence to explain the exceptional circumstances justifying the release of this land from the Green Belt.  
2. Further investigation will be required and we look forward to reviewing the results of the council's further consideration of the delivery and sustainability of the provisional allocation on the CBC extension.  
3. The provisional allocation of land to the south of CBC is not sufficient to meet the needs of the bio-medical and healthcare life sciences research needing to be located in close proximity to CBC and Addenbrooke's.

Relevant sections of attached document:

Executive summary, Section 1 - Introduction - para 1.1 to 1.6, Section 6 - Provisional Allocation of Land for CBC Extension, Section 7 - Conclusions - para 7.1 to 7.6, Appendix 1, Appendix 5.

Change To Plan: A proper assessment to be undertaken of employment land requirements, supply and delivery for the specific employment sector of bio-medical, healthcare and life sciences requiring a location in close proximity to CBC and Addenbrooke's Hospital and the allocation of more land, such as Cambridge South, for medical based R&D employment use close to CBC and Addenbrooke's Hospital.

Legally Compliant?: Yes

Full Reference: O - 65415 - 25320 - PM/SC/2/O - i, ii, iii, iv

## 65544 Object

**Respondent: Great Shelford Parish Council (Mrs Bridget Hodge) [12740]**

**Agent: N/A**

Summary: SCDC states there is no shortage of employment land for high tec R&D but has not demonstated why the locational benefits of developing this site outweigh the amenity value of the green belt.

Change To Plan: Gt Shelford P.C. believe the site should be part of a landscape enhancement scheme increasing the amenity area around Nine Wells as proposed by the village in our Village Design Statement.

Legally Compliant?: Yes

Full Reference: O - 65544 - 12740 - PM/SC/2/O - ii

## 66013 Object

**Respondent: Commercial Estates Group [17653]**

**Agent: Nathaniel Lichfield & Partners (Mr Matthew Spry) [20555]**

Summary: Land North of Cherry Hinton

Reviewed updated evidence base and remain concerned there is insufficient evidence to support spatial distribution of housing growth around Cambridge and South Cambridgeshire.

Latest transport and infrastructure studies do not support chosen locations for housing, including Land North of Cherry Hinton. Support Plans which maximise development on edge of Cambridge in principle, but insufficient transport and infrastructure evidence to justify increased allocation in this location during plan period. CEG notes Council does not explain why increase is justified in the reasons for this main modification.

Representation supported by range of technical papers which form part of and support this representation, including Technical Papers on Transport and Infrastructure OAHN (Appendices 4 and 5). Papers provide a critique of latest assessments and sets out reasons why proposed transport strategy and infrastructure will not adequately support growth or deliver sustainable development.

Relevant Attachment  
Cambridge South East 1.4 Section 2  
Appendix 4(Transport) and 5(Green Belt)

Change To Plan: Amend modification

Legally Compliant?: Not Specified

Full Reference: O - 66013 - 17653 - PM/SC/2/O - i, ii, iii, iv

## 66014 Object

**Respondent: Commercial Estates Group [17653]**

**Agent: Nathaniel Lichfield & Partners (Mr Matthew Spry) [20555]**

Summary: Employment Allocation E/2

For the reasons set out in detail in Green Belt Review Technical Paper (Appendix 3) which accompanies this representation and forms part of it, the conclusion in relation to land east of Peterhouse Technology Park (E/2) and proposed alteration to allocation are fundamentally flawed.

In relation to both E/2 and provisional new release south of Biomedical Campus, CEG object to Council's approach to defining boundaries which fails to provide clear and recognisable boundaries based on readily recognisable physical features which are likely to be permanent (NPPF para 85).

As a minimum, proposed allocation E/2 must be reinstated to its original extent and this modification to text amended accordingly.

Representation is supported by Green Belt Review Technical Paper (Appendix 3).

Relevant Attachment  
Cambridge South East 1.4 Section 2 and  
Appendix 3(Green Belt), 4(Transport) and 5(Infrastructure)

Change To Plan: Amend modification

Legally Compliant?: Not Specified

Full Reference: O - 66014 - 17653 - PM/SC/2/O - i, ii, iii, iv

**65304 Object**

**Respondent:** Rustat Road Neighbourhood Association (Mr Roger Crabtree) [16745] **Agent:** N/A

Summary: We strongly oppose the appropriation of this green belt land. The area of Green belt around the Gog Magog hills is a most important area of green belt. This proposed extension of the Biomedical campus will be highly visible from those hills. It is a well used area, and the proposed additional are is unacceptably near to the 9 Wells Nature Reserve, one of Cambridge's best loved areas at the edge of the city. This is a step to far. This proposal is in conflict with 2.17 and the development of this site will substantially harm the Green Belt.

Change To Plan: Retain this land next to the Biomedical Campus as Green belt

Legally Compliant?: Yes

Full Reference: O - 65304 - 16745 - PM/SC/2/P - ii

**65366 Object**

**Respondent:** Trumpington Residents Association (Andrew Roberts) [5312] **Agent:** N/A

Summary: The Trumpington Residents' Association objects to the proposed revision to paragraph 2.44, with respect to the allocation of an employment site at the Cambridge Biomedical Campus (Policy E/1B). The modification is not justified, as the arguments about the value of this land to the Green Belt given in the Inner Green Belt Review 2015 are flawed and the Council has failed to demonstrate that there are exceptional circumstances for the need for jobs at this location.

Change To Plan: Deletion of the proposed reference to the expansion of the Cambridge Biomedical Campus.

Legally Compliant?: Yes

Full Reference: O - 65366 - 5312 - PM/SC/2/P - ii, iv

**65416 Object**

**Respondent:** Pigeon Land & LIH [25320] **Agent:** CODE Development Planners Ltd (Ms Karen Beech) [25295]

Summary: 1. Land south of CBC is provisionally allocated for employment but we are unable to find any evidence to explain the exceptional circumstances justifying the release of this land from the Green Belt.  
2. Further investigation will be required and we look forward to reviewing the results of the council's further consideration of the delivery and sustainability of the provisional allocation on the CBC extension.  
3. The provisional allocation of land to the south of CBC is not sufficient to meet the needs of the bio-medical and healthcare life sciences research needing to located in close proximity to CBC and Addenbrooke's.

Relevant sections of attached document:

Executive summary, Section 1 - Introduction - para 1.1 to 1.6, Section 6 - Provisional Allocation of Land for CBC Extension, Section 7 - Conclusions - para 7.1 to 7.6, Appendix 1, Appendix 5.

Change To Plan: A proper assessment to be undertaken of employment land requirements, supply and delivery for the specific employment sector of bio-medical, healthcare and life sciences requiring a location in close proximity to CBC and Addenbrooke's Hospital and the allocation of more land, such as Cambridge South, for medical based R&D employment use close to CBC and Addenbrooke's Hospital.

Legally Compliant?: Yes

Full Reference: O - 65416 - 25320 - PM/SC/2/P - i, ii, iii, iv

**65556 Object**

**Respondent:** Great Shelford Parish Council (Mrs Bridget Hodge) [12740] **Agent:** N/A

Summary: Gt Shelfrd Parish Council believe that it has not been demonstrated that any benefits of the allocation of this site outweigh the harm done to the green belt.

Change To Plan: Gt Shelford P.C. believe the site should be part of a landscape enhancement scheme increasing the amenity area around Nine Wells as proposed by the village in our Village Design Statement.

Legally Compliant?: Yes

Full Reference: O - 65556 - 12740 - PM/SC/2/P - ii

**65719 Object**

**Respondent:** David Blake [25352]

**Agent:** N/A

Summary: Building on land within 30 metres of a nature reserve is unsustainable.

Change To Plan:

This modification to the plan should be deleted in its entirety, and all additional modifications relevant to this location should also be removed (e.g. PM/SC/2/P, PM/SC/8/A, PM/SC/8/B, PM/SC/3/F).

Legally Compliant?: Not Specified

Full Reference: O - 65719 - 25352 - PM/SC/2/P - None

**65254 Object**

**Respondent: Dr C Grant [22459]**

**Agent: N/A**

Summary: While the plan may be considering that Waterbeach will not deliver housing before Northstowe has been developed currently Bourn, Cambourne and Northstowe all have better road and guided bus lines with Cambridge and developments here should be completed before Waterbeach is developed. In particular without considerable improvement to the road and drainage infrastructure Waterbeach new town development should not be started.

Change To Plan: That developments at Northstowe, Cambourne and Bourn are brought forward first in the plan period. Indeed Northstowe should be largely completed before another major settlement (ie over 5000) is started.

Legally Compliant?: Yes

Full Reference: O - 65254 - 22459 - PM/SC/2/Q - i, ii

**65279 Object**

**Respondent: Dr Neil Blair [16668]**

**Agent: N/A**

Summary: There will be sufficient homes in West Cambourne to ensure that Bourn Airfield Development is not required. Development on Bourn Airfield should not start until late in the LDP timescale.

Change To Plan: Bourn Airfield to be removed from the plan and construction taking place at West Cambourne instead.

Legally Compliant?: Yes

Full Reference: O - 65279 - 16668 - PM/SC/2/Q - i, ii, iii

**65344 Object**

**Respondent: Mr Brian Williams [17286]**

**Agent: N/A**

Summary: I support the retarding of waterbeach till late in the plan period even though this seems to contradict SCDC statements in other modification statements.

Change To Plan:

Legally Compliant?: Not Specified

Full Reference: O - 65344 - 17286 - PM/SC/2/Q - None

**65346 Object**

**Respondent: Mr Brian Williams [17286]**

**Agent: N/A**

Summary: SCDC have ignored all the indications from the Inspectors that 3 new settlements will be difficult to sustain, they have removed any attempt to stage delivery essentially planning a free for all and thus no guarantee that any of them will be successful. This also contradicts the 1st core principle of the National Planning Policy Framework which says all development should be. Plan Lead.  
Further the policy of New settlements is clearly the most expensive way to increase housing provision and as there is no quantifiable increase in benefit for the occupiers it must be a waste of Taxpayers money.

Change To Plan: Concentrate development on the edge of Cambridge as directed by inspectors letter

Legally Compliant?: Yes

Full Reference: O - 65346 - 17286 - PM/SC/2/Q - i, ii, iii, iv

**65348 Object**

**Respondent: Mr Brian Williams [17286]**

**Agent: N/A**

Summary: The New Settlement policy must develop the A428 and A14 corridors before the A10 Corridor as 428 cost much less to deliver and it makes no sense to commit £428M infrastructure cost for Waterbeach (Approx £100Million < Bourn and Nstowe combined) until we confirm the Plan on track to deliver by 2031.  
Also Northstowe is well advanced in planning, has the advantage of the Guided Bus from Huntingdon to Cambridge which can easily extend to call at the new Chesterton Station. Bourn has access to the A428 which unlike the A10 has capacity.

Change To Plan: No change from original

Legally Compliant?: Yes

Full Reference: O - 65348 - 17286 - PM/SC/2/Q - i, ii, iii, iv



## 65353 Object

**Respondent: Mr Brian Williams [17286]**

**Agent: N/A**

Summary: There is still no recognised strategy for the delivery of transport infrastructure in the A10 corridor.  
Any advance of development at Waterbeach or Bourn may put at risk the delivery and success of Northstowe which is the flagship settlement of SCDC.

The delivery of New settlements in particular but also the Revised LDF as a whole must be considered unsound due to the significant potential for underfunding as identified in the Infrastructure Delivery Study Update 2013.

Cambridge has a predicted finance shortfall of £207m over the plan period. And South Cambs £1.3 Billion. The plan needs to show how this gap may be closed before any commitment is given to commence development in already congested areas.

The New Settlement policy must develop the A428 and A14 corridors before the A10 Corridor as 428 cost much less to deliver and it makes no sense to commit £428M infrastructure cost for Waterbeach (Approx £100Million < Bourn and Nstowe combined) until we confirm the Plan on track to deliver by 2031.  
Also Northstowe is well advanced in planning, has the advantage of the Guided Bus from Huntingdon to Cambridge which can easily extend to call at the new Chesterton Station. Bourn has access to the A428 which unlike the A10 has capacity.

SCDC have ignored all the indications from the Inspectors that 3 new settlements will be difficult to sustain, they have removed any attempt to stage delivery essentially planning a free for all and thus no guarantee that any of them will be successful. This also contradicts the 1st core principle of the National Planning Policy Framework which says all development should be. Plan Lead.  
Further the policy of New settlements is clearly the most expensive way to increase housing provision and as there is no quantifiable increase in benefit for the occupiers it must be a waste of Taxpayers money.

I support the retarding of waterbeach till late in the plan period even though this seems to contradict SCDC statements in other modification statements.

Change To Plan: Concentrate development on the edge of Cambridge as directed by inspectors letter

Legally Compliant?: Not Specified

Full Reference: O - 65353 - 17286 - PM/SC/2/Q - i, ii, iii, iv

## 65395 Object

**Respondent: Dr Neil Blair [16668]**

**Agent: N/A**

Summary: Creating a new development at Bourn Airfield and Cambourne (West & North) will concentrate too many new houses in an already congested area.

Change To Plan: Bourn Airfield Development to be removed from the local plan.

Legally Compliant?: Yes

Full Reference: O - 65395 - 16668 - PM/SC/2/Q - i, ii, iii

## 65402 Object

**Respondent: Lorraine Rogers [25350]**

**Agent: N/A**

Summary: The infrastructure needs to be in place before further development starts.

Change To Plan: Infrastructure in place before development is allowed to commence.

Legally Compliant?: No

Full Reference: O - 65402 - 25350 - PM/SC/2/Q - iii

## 65454 Object

**Respondent: Pigeon Land & LIH [25320]**

**Agent: CODE Development Planners Ltd (Ms Karen Beech) [25295]**

Summary: 1. Seeking to bring forward the delivery of Waterbeach 2022 is not realistic given the amount of required infrastructure, the timescales that will be needed to acquire third party land for the infrastructure and the funding gap for this infrastructure, which was previously discussed at the examination but still remains despite the 2015 updated background technical reports.  
2. Development at Bourn Airfield is not sustainable and improvements to public transport infrastructure will only bring about a 6-7% modal shift resulting in a significant increase in car journeys as residents seek to access work, services and facilities in Cambridge.

Relevant documents:160125\_CSTpt.pdf

Executive summary

Section 1 - Introduction - para 1.1 to 1.6

Section 2 - OAHN & Housing Delivery - section 2.2 - para 2.2.1 to 2.2.5

Section 4 - Overall Development Strategy - para 4.1 to 4.5

Section 7 - Conclusions - para 7.1 to 7.6

Change To Plan: We consider that the proposed allocation at Bourn Airfield should be deleted.  
The total number of dwellings from Waterbeach during the plan period should reduce from 2,050 to 1,100 and the start date for the development should be realistic. We estimated realistic commencement in our objections to the submission Local Plan as 2028/29 to take account of the significant highway and public transport infrastructure improvements required.

Legally Compliant?: Yes

Full Reference: O - 65454 - 25320 - PM/SC/2/Q - i, ii, iii

## 65683 Object

**Respondent: Dr Shane Lawrence [19183]**

**Agent: N/A**

Summary: The activities of SCDC together with City Deal mean that both the actual allocation of this 19,500 can be considered to be appreciatively 95% complete due to the following developments - Waterbeach, Bourn Airfield, Northstowe, Madingly Road, Trumpington Meadows with a further contribution from the 2 Newmarket Road areas.

The fact that the figure of 19,500 is over 90% allocated means that small village developments are not needed to accomplish this figure and should not be considered for approval for development.

Change To Plan:

Legally Compliant?: Not Specified

Full Reference: O - 65683 - 19183 - PM/SC/2/Q - None

## 65734 Object

**Respondent: Mrs Jane Williams [24698]**

**Agent: N/A**

Summary: Object for the following reasons:  
\*Unrestricted build at Waterbeach New Town by 2031 is not sustainable or viable.  
\*Waterbeach village is a Minor Rural Centre/Better Served Village.  
\*Infrastructure not in place. A10 over capacity. Doctors/School already at capacity.  
\*Overbearing on existing village development, on landowners/promoters working together landscape and ecology issues, where will build start on SS/5  
\*Separation.  
\*Develop Northstowe first.

Change To Plan:

Legally Compliant?: Not Specified

Full Reference: O - 65734 - 24698 - PM/SC/2/Q - i, ii, iii, iv

## 65879 Object

**Respondent: Waterbeach Parish Council (Liz Jones) [17084]**

**Agent: N/A**

Summary: SCDC ignored Inspectors that 3 new settlements difficult to sustain, removed staged delivery and no guarantee any will be successful. Contradicts 1st core principle of NPPF - all development should be Plan Led.

New settlements most expensive way to increase housing provision - no increase in benefit for occupiers waste of Taxpayers money.

Develop in A428 and A14 corridors before A10 as cost less to deliver - £428M infrastructure for Waterbeach (£100M more than Bourn and Northstowe combined).

Northstowe well advanced, has Guided Bus which can call at new Chesterton Station. Bourn access to A428, unlike A10, has capacity for traffic growth.

No recognised strategy for delivery of transport infrastructure in A10 corridor.

Any advance of development at Waterbeach or Bourn may put at risk delivery and success of Northstowe which is flagship settlement.

Waterbeach PC undertook their own survey locally and received 242 returned questionnaires; the responses and summary are attached as evidence.

Change To Plan:

Legally Compliant?: Not Specified

Full Reference: O - 65879 - 17084 - PM/SC/2/Q - None

## 65883 Object

**Respondent: Waterbeach Parish Council (Liz Jones) [17084]**

**Agent: N/A**

Summary: The delivery of New settlements in particular but also the Revised LDF as a whole must be considered unsound due to the significant potential for underfunding as identified in the Infrastructure Delivery Study Update 2013.

Cambridge has a predicted finance shortfall of £207m over the plan period.

And South Cambs £1.3 Billion.

The plan need to show how this gap may be closed before any commitment is given to commence development in already congested area's.

Waterbeach PC undertook their own survey locally and received 242 returned questionnaires; the responses and summary are attached as evidence.

Change To Plan:

Legally Compliant?: Not Specified

Full Reference: O - 65883 - 17084 - PM/SC/2/Q - None

## 65974 Object

**Respondent: Hallmark Hotels (Bar Hill) Ltd [25472]**

**Agent: CgMs (Matthew Roe) [25471]**

Summary: We disagree with modification PM/SC/2Q and would encourage a policy that promoted residential development in villages other than the 8 sites allocated. Allocation of our site would facilitate sustainable development and deliver housing to help meet the identified windfall need.

This modification states that "a significant amount of development would be required at villages and would result in the sort of dispersed development strategy confirmed as being unsustainable". We do not agree with this statement and believe that residential development in villages further to those 8 allocated can offer a form of sustainable development.

Change To Plan:

Legally Compliant?: Not Specified

Full Reference: O - 65974 - 25472 - PM/SC/2/Q - None

## 66201 Object

**Respondent:** MCA Developments Limited [3652]

**Agent:** Barton Willmore (Mr Steven Kosky) [3212]

**Summary:** Bringing forward phasing of Bourn Airfield so significantly, will force both sites to compete for same market share within same timeframe. Market capacity has its own level and most likely outcome will be reduction in anticipated delivery rates of both sites, with no net gains to overall housing trajectory.

Bourn Airfield will directly compete with existing Cambourne for inward investment and other resources at critical time in Cambourne's development, as established new settlement looks to reach more sustainable critical mass.

Advocate phasing of Bourn Airfield left unchanged, so if Inspector finds in favour of this allocation, it will come on line later in Plan Period, when likely to be most needed and where it will not be prejudicial to successful completion of Cambourne

**Change To Plan:** Amend modification

**Legally Compliant?:** Not Specified

**Full Reference:** O - 66201 - 3652 - PM/SC/2/Q - i, iii, iv

## 65300 Support

**Respondent:** Campaign to Protect Rural England (CPRE) (Miss Shirley Fieldhouse) [17302]

**Agent:** N/A

**Summary:** CPRE supports the more flexible approach to the start of development at new settlements, though appropriate provision of infrastructure and facilities (including affordable housing) will also have to be brought forward.

**Change To Plan:**

**Legally Compliant?:** Not Specified

**Full Reference:** S - 65300 - 17302 - PM/SC/2/Q - None

## 65356 Support

**Respondent:** Mr Brian Williams [17286]

**Agent:** N/A

**Summary:** The delivery of New settlements in particular but also the Revised LDF as a whole must be considered unsound due to the significant potential for underfunding as identified in the Infrastructure Delivery Study Update 2013.

Cambridge has a predicted finance shortfall of £207m over the plan period. And South Cambs £1.3 Billion. The plan needs to show how this gap may be closed before any commitment is given to commence development in already congested areas.

**Change To Plan:**

**Legally Compliant?:** Not Specified

**Full Reference:** S - 65356 - 17286 - PM/SC/2/Q - None

## 65706 Support

**Respondent:** The Taylor Family & Countryside Properties (UK) Ltd [19841]

**Agent:** Andrew Martin - Planning Limited (Mr Andrew Martin) [16509]

**Summary:** Paragraph 2.45 is to be amended to ensure that the supporting text is consistent with the proposed modification to Policy S/6. We support the removal of reference to 4,370 homes being provided in 2 new settlements (Bourn and Waterbeach) in the plan period.

**Change To Plan:**

**Legally Compliant?:** Not Specified

**Full Reference:** S - 65706 - 19841 - PM/SC/2/Q - None

**66218 Support**

**Respondent: RLW Estates [1284]**

**Agent: Boyer Planning (Matthew Clarke) [9069]**

Summary: RLW Estates supports the removal of the previous phasing restrictions at Waterbeach, and to the consequential deletion of references within supporting text at Para. 2.45.

Not considered that new settlement at Waterbeach would be in direct competition with Northstowe as set out in previous representations, based on study commissioned from Jones Lang LaSalle which accompanied earlier submissions and is indeed included as RD/RWL&DIO/020 within the Examination Library.

Anticipate submission of initial planning applications in late 2016 and completions in 2020/21 / sooner. At least 4,300 dwellings by 2031. Earlier, and a higher level of development, than the Council's cautious assumptions within their latest housing trajectory.

Change To Plan:

Legally Compliant?: Not Specified

Full Reference: S - 66218 - 1284 - PM/SC/2/Q - None

**65255 Object**      **Respondent: Dr C Grant [22459]**      **Agent: N/A**

Summary: Deleting phasing requirement without a matching requirement for provision of infrastructure before development commences is not an effective way to achieve sustainable development that does not severely impact existing residents and businesses by overloading current infrastructure. This is particularly acute for Waterbeach where if the site is developed rapidly appropriate infrastructure will not be in place. The plan should include phasing by provision of infrastructure before development if particular dates are not respected.

Change To Plan: That there should be a clear statement that until infrastructure improvements eg to the A10 are delivered no significant developments should be allowed at Waterbeach. Housing should be prioritised where there is a good road/bus link to Cambridge ie Bourn, Cambourne and Northstowe.

Legally Compliant?: Yes

Full Reference: O - 65255 - 22459 - PM/SC/2/R - i

**65280 Object**      **Respondent: Dr Neil Blair [16668]**      **Agent: N/A**

Summary: The original wording should be retained. If Bourn Airfield is to be developed, then it should be lower in numbers and towards the end of the local plan rather than so many new houses early on in the plan.

Bourn Airfield Development should not start until 2022 if at all.

Change To Plan: Reinstate the original wording of the document.

Legally Compliant?: Yes

Full Reference: O - 65280 - 16668 - PM/SC/2/R - i, ii, iii

**65318 Object**      **Respondent: Barratt Eastern Counties and the North West Cambridge Consortium of Landowners [17788]**      **Agent: BIDWELLS LLP (MISS MARCIA WHITEHEAD) [25328]**

Summary: We object to the Proposed Modification to Policy S/12 increasing the Council's housing target by 500 homes to 19,500 dwellings. The Further Evidence in relation to the OAN to which the Proposed Modification refers is flawed and fails to fully consider economic trends.

Consequently, the Council's housing requirement is not founded on robust evidence prepared in a manner compliant with the NPPF and PPG. The Inspectors' concerns have not been fully addressed and the Council's Housing target does not meet the OAN. The Proposed Modifications are therefore unsound as they are not:

- \* positively prepared;
- \* justified;
- \* consistent with National Policy.

Change To Plan: Policy S/12 should be deleted and any shortfalls in the Council's housing land supply should be addressed through further allocations within the Plan.

It is considered that this revised approach would enable the Council to meet the objectively assessed housing needs for Cambridge in full and boost significantly the supply of housing in accordance with the requirements of Government guidance in the NPPF paragraphs 47 and 159. As such, this will ensure that the Plan is Sound.

Legally Compliant?: No

Full Reference: O - 65318 - 17788 - PM/SC/2/R - i, ii, iv

## 65345 Object

**Respondent: Mr Brian Williams [17286]**

**Agent: N/A**

Summary: SCDC have ignored all the indications from the Inspectors that 3 new settlements will be difficult to sustain, they have removed any attempt to stage delivery essentially planning a free for all and thus no guarantee that any of them will be successful. This also contradicts the 1st core principle of the National Planning Policy Framework which says all development should be. Plan Lead.  
Further the policy of New settlements is clearly the most expensive way to increase housing provision and as there is no quantifiable increase in benefit for the occupiers it must be a waste of Taxpayers money.

The delivery of New settlements in particular but also the Revised LDF as a whole must be considered unsound due to the significant potential for underfunding as identified in the Infrastructure Delivery Study Update 2013.  
Cambridge has a predicted finance shortfall of £207m over the plan period. And South Cambs £1.3 Billion. The plan needs to show how this gap may be closed before any commitment is given to commence development in already congested areas.

There is still no recognised strategy for the delivery of transport infrastructure in the A10 corridor.  
Any advance of development at Waterbeach or Bourn may put at risk the delivery and success of Northstowe which is the flagship settlement of SCDC.

The New Settlement policy must develop the A428 and A14 corridors before the A10 Corridor as 428 cost much less to deliver and it makes no sense to commit £428M infrastructure cost for Waterbeach (Approx £100Million < Bourn and Nstowe combined) until we confirm the Plan on track to deliver by 2031.  
Also Northstowe is well advanced in planning, has the advantage of the Guided Bus from Huntingdon to Cambridge which can easily extend to call at the new Chesterton Station. Bourn has access to the A428 which unlike the A10 has capacity.

Change To Plan: Leave deletion in the plan  
Concentrate on delivery of Northstowe and increase numbers on edge of Cambridge as this is more sustainable and easier to deliver.

Legally Compliant?: Yes

Full Reference: O - 65345 - 17286 - PM/SC/2/R - i, ii, iii, iv

## 65349 Object

**Respondent: Mr Brian Williams [17286]**

**Agent: N/A**

Summary: The New Settlement policy must develop the A428 and A14 corridors before the A10 Corridor as 428 cost much less to deliver and it makes no sense to commit £428M infrastructure cost for Waterbeach (Approx £100Million < Bourn and Nstowe combined) until we confirm the Plan on track to deliver by 2031.  
Also Northstowe is well advanced in planning, has the advantage of the Guided Bus from Huntingdon to Cambridge which can easily extend to call at the new Chesterton Station. Bourn has access to the A428 which unlike the A10 has capacity.

Change To Plan: No change

Legally Compliant?: Yes

Full Reference: O - 65349 - 17286 - PM/SC/2/R - i, ii, iii, iv

## 65352 Object

**Respondent: Mr Brian Williams [17286]**

**Agent: N/A**

Summary: There is still no recognised strategy for the delivery of transport infrastructure in the A10 corridor.  
Any advance of development at Waterbeach or Bourn may put at risk the delivery and success of Northstowe which is the flagship settlement of SCDC.

Change To Plan: Concentrate on delivery of Northstowe and increase numbers on edge of Cambridge as this is more sustainable and easier to deliver.

Legally Compliant?: Yes

Full Reference: O - 65352 - 17286 - PM/SC/2/R - i, ii, iii, iv

## 65358 Object

**Respondent: Mr Brian Williams [17286]**

**Agent: N/A**

Summary: The delivery of New settlements in particular but also the Revised LDF as a whole must be considered unsound due to the significant potential for underfunding as identified in the Infrastructure Delivery Study Update 2013.  
Cambridge has a predicted finance shortfall of £207m over the plan period. And South Cambs £1.3 Billion. The plan needs to show how this gap may be closed before any commitment is given to commence development in already congested areas.

Change To Plan: No change to paragraph

Legally Compliant?: Yes

Full Reference: O - 65358 - 17286 - PM/SC/2/R - i, ii, iii, iv

## 65396 Object

**Respondent:** Dr Neil Blair [16668]

**Agent:** N/A

**Summary:** The original wording should be retained. If Bourn Airfield is to be developed, then it should be lower in numbers and towards the end of the local plan rather than so many new houses early on in the plan.

**Change To Plan:** The changes to be discarded and the original wording to be retained.

**Legally Compliant?:** Yes

**Full Reference:** O - 65396 - 16668 - PM/SC/2/R - i, ii, iii

## 65403 Object

**Respondent:** Lorraine Rogers [25350]

**Agent:** N/A

**Summary:** The infrastructure needs to be in place before further development takes place.

**Change To Plan:** Infrastructure provided before the development takes place.

**Legally Compliant?:** No

**Full Reference:** O - 65403 - 25350 - PM/SC/2/R - iii

## 65456 Object

**Respondent:** Pigeon Land & LIH [25320]

**Agent:** CODE Development Planners Ltd (Ms Karen Beech) [25295]

**Summary:** 1. Seeking to bring forward the delivery of Waterbeach 2022 is not realistic given the amount of required infrastructure, the timescales that will be needed to acquire third party land for the infrastructure and the funding gap for this infrastructure, which was previously discussed at the examination but still remains despite the 2015 updated background technical reports.  
2. Development at Bourn Airfield is not sustainable and improvements to public transport infrastructure will only bring about a 6-7% modal shift resulting in a significant increase in car journeys as residents seek to access work, services and facilities in Cambridge.

**Relevant documents:**160125\_CSTpt.pdf

**Executive summary**

Section 1 - Introduction - para 1.1 to 1.6

Section 2 - OAHN & Housing Delivery - section 2.2 - para 2.2.1 to 2.2.5

Section 4 - Overall Development Strategy - para 4.1 to 4.5

Section 7 - Conclusions - para 7.1 to 7.6

**Change To Plan:** We consider that the proposed allocation at Bourn Airfield should be deleted.

The total number of dwellings from Waterbeach during the plan period should reduce from 2,050 to 1,100 and the start date for the development should be realistic. We estimated realistic commencement in our objections to the submission Local Plan as 2028/29 to take account of the significant highway and public transport infrastructure improvements required.

**Legally Compliant?:** Yes

**Full Reference:** O - 65456 - 25320 - PM/SC/2/R - i, ii, iii



65490 Object

Respondent: Bidwells (Miss Marcia Whitehead) [17324]

Agent: Bidwells LLP (Alison Barnes) [25318]

Summary: Bidwells object to the Proposed Modification to Policy S/12 increasing the Council's housing target by 500 homes to 19,500 dwellings. The Further Evidence in relation to the OAN to which the Proposed Modification refers is flawed and fails to fully consider economic trends.

The Council's housing requirement is not founded on robust evidence prepared in a manner compliant with the NPPF and PPG. The Inspectors' concerns have not been fully addressed and the Council's Housing target still does not meet the OAN. The Proposed Modifications are therefore unsound as they are not:

\* positively prepared;

\* justified;

\* consistent with National Policy.

Change To Plan: Policy S/12 should be deleted and any shortfalls in the Council's housing land supply should be addressed through further allocations within the Plan.

It is considered that this revised approach would enable the Council to meet the objectively assessed housing needs for Cambridge in full and boost significantly the supply of housing in accordance with the requirements of Government guidance in the NPPF paragraphs 47 and 159. As such, this will ensure that the Plan is Sound.

Legally Compliant?: No

Full Reference: O - 65490 - 17324 - PM/SC/2/R - i, ii, iv

65535 Object

Respondent: Endurance Estates Limited [19174]

Agent: Bidwells LLP (Susan Chappell) [25316]

Summary: Endurance Estates object to the Proposed Modification to Policy S/12 increasing the Council's housing target by 500 homes to 19,500 dwellings. The Further Evidence in relation to the OAN to which the Proposed Modification refers is flawed and fails to fully consider economic trends.

The Council's housing requirement is not founded on robust evidence prepared in a manner compliant with the NPPF and PPG.The Inspectors' concerns have not been fully addressed and the Council's Housing target still does not meet the OAN. The Proposed Modifications are therefore unsound as they are not:

\* positively prepared;

\* justified;

\* consistent with National Policy.

Change To Plan: Policy S/12 should be deleted and any shortfalls in the Council's housing land supply should be addressed through further allocations within the Plan.

It is considered that this revised approach would enable the Council to meet the objectively assessed housing needs for Cambridge in full and boost significantly the supply of housing in accordance with the requirements of Government guidance in the NPPF paragraphs 47 and 159. As such, this will ensure that the Plan is Sound.

Legally Compliant?: No

Full Reference: O - 65535 - 19174 - PM/SC/2/R - i, ii, iv

65576 Object

Respondent: Pigeon Land & LIH [25320]

Agent: CODE Development Planners Ltd (Ms Karen Beech) [25295]

Summary: We do not consider that Cambridge City and South Cambridgeshire should have a joint housing trajectory.

South Cambridgeshire and Cambridge City have separate local plans and should therefore in our view have separate housing trajectories.

This was confirmed by the inspector who considered two planning appeals at Waterbeach and said in the decision letter, dated 25 June 2014, that a joint housing trajectory would not be the correct approach.

Relevant documents:160125\_CSTpt.pdf

Executive summary  
Section 1 - Introduction - para 1.1 to 1.6  
Section 2 - OAHN & Housing Delivery - section 2.2 - para 2.2.1 to 2.2.5  
Section 4 - Overall Development Strategy - para 4.1 to 4.5  
Section 7 - Conclusions - para 7.1 to 7.6

Change To Plan: Given that Cambridge City and South Cambridgeshire are preparing separate Local Plans, each should have their own housing trajectory.

Legally Compliant?: Yes

Full Reference: O - 65576 - 25320 - PM/SC/2/R - i, ii, iii

65607 Object

Respondent: Pembroke College & the Balaam Family [21173]

Agent: Bidwells LLP (Susan Chappell) [25316]

Summary: Pembroke & the Balaam Family object to the Proposed Modification to Policy S/12 increasing the Council's housing target by 500 homes to 19,500 dwellings. The Further Evidence in relation to the OAN to which the Proposed Modification refers is flawed and fails to fully consider economic trends.

The Council's housing requirement is not founded on robust evidence prepared in a manner compliant with the NPPF and PPG.The Inspectors' concerns have not been fully addressed and the Council's Housing target still does not meet the OAN.Proposed Modifications are unsound as they are not:

- \* positively prepared;
- \* justified;
- \* consistent with National Policy

Change To Plan: Policy S/12 should be deleted and any shortfalls in the Council's housing land supply should be addressed through further allocations within the Plan.

It is considered that this revised approach would enable the Council to meet the objectively assessed housing needs for Cambridge in full and boost significantly the supply of housing in accordance with the requirements of Government guidance in the NPPF paragraphs 47 and 159. As such, this will ensure that the Plan is Sound.

Legally Compliant?: No

Full Reference: O - 65607 - 21173 - PM/SC/2/R - i, ii, iv

65612 Object

Respondent: Unwins and Biggs [25382]

Agent: Bidwells LLP (Alison Barnes) [25318]

Summary: Unwins and Biggs object to the Proposed Modification to Policy S/12 increasing the Council's housing target by 500 homes to 19,500 dwellings. The Further Evidence in relation to the OAN to which the Proposed Modification refers is flawed and fails to fully consider economic trends.

The Council's housing requirement isn't founded on robust evidence prepared in a manner compliant with the NPPF and PPG. The Inspectors' concerns have not been fully addressed and the Council's Housing target still does not meet the OAN. The Proposed Modifications are therefore unsound as they are not:

- \* positively prepared;
- \* justified;
- \* consistent with National Policy.

Change To Plan: Policy S/12 should be deleted and any shortfalls in the Council's housing land supply should be addressed through further allocations within the Plan.

It is considered that this revised approach would enable the Council to meet the objectively assessed housing needs for Cambridge in full and boost significantly the supply of housing in accordance with the requirements of Government guidance in the NPPF paragraphs 47 and 159. As such, this will ensure that the Plan is Sound.

Legally Compliant?: No

Full Reference: O - 65612 - 25382 - PM/SC/2/R - i, iv

65627 Object

Respondent: Cllr James Hockney [18721]

Agent: N/A

Summary: The removal of the restriction on the level of quantum and timelines is not a strategic approach.

At the Full Council meeting I raised specific concerns on the delivery of infrastructure. It is very unclear whether there is sufficient funding in place that is required to bring this development forward.

The change could lead to a much higher level of quantum in terms of house building in the Local Plan period.

Change To Plan: Further evidence on whether infrastructure can be delivered and funded on a shorter timescale.

Legally Compliant?: No

Full Reference: O - 65627 - 18721 - PM/SC/2/R - i, ii

65735 Object

Respondent: Mrs Jane Williams [24698]

Agent: N/A

Summary: Object for the following reasons:  
\*Unrestricted build at Waterbeach New Town by 2031 is not sustainable or viable.  
\*Waterbeach village is a Minor Rural Centre/Better Served Village.  
\*Infrastructure not in place. A10 over capacity. Doctors/School already at capacity.  
\*Overbearing on existing village development, on landowners/promoters working together landscape and ecology issues, where will build start on SS/5  
\*Separation.  
\*Develop Northstowe first.

Change To Plan:

Legally Compliant?: Not Specified

Full Reference: O - 65735 - 24698 - PM/SC/2/R - i, ii, iii, iv

## 65745 Object

**Respondent: Homes and Communities Agency (Paul Kitson) [15884]**

**Agent: N/A**

Summary: Infrastructure Delivery Study 2015 does not assess Northstowe Phase 3 as considered post plan period - may underestimate infrastructure demands. Member desire, HCA intention and Government housing agenda intend to speed up delivery.

Modification to remove phasing of Waterbeach and Bourn Airfield needs proper scrutiny to understand resulting impacts on delivery and competition at Northstowe and other allocated strategic sites. Though councils confident capital funding is available through City Deal, Inspectors also need to consider implementation and delivery of transport and other infrastructure improvements in context of competing demands were Northstowe, Waterbeach and Bourn Airfield to overlap. Will councils', and utility providers', resources cope with the delivery needs of all sites combined?

Change To Plan:

Legally Compliant?: Not Specified

Full Reference: O - 65745 - 15884 - PM/SC/2/R - None

## 65838 Object

**Respondent: CALA Homes (North Homes Counties) Ltd [25454]**

**Agent: Carter Jonas LLP (Brian Flynn) [17331]**

Summary: Paragraph 47 of the NPPF makes no provision for combined housing trajectories, and the responsibility for maintaining a five year housing supply rests with individual local planning authorities. Even where a joint plan is prepared each authority still retains overall responsibility for maintaining its own housing land supply. No alternatives to a joint housing trajectory have been considered by the Councils.

Until now no action has been taken to boost housing delivery, and the undersupply position is worsening year on year. The SC housing trajectory is currently overly optimistic in terms of delivery rates at some of the larger sites, and the housing that is actually delivered in the medium to long term will almost certainly be lower than currently predicted by the Council.

Change To Plan: We request that all references to a joint housing trajectory are deleted from Draft SCLP. We request that a more robust assessment of the sites is undertaken and the housing trajectory is adjusted accordingly.

Legally Compliant?: Not Specified

Full Reference: O - 65838 - 25454 - PM/SC/2/R - i, ii, iii, iv

## 65854 Object

**Respondent: Mr C Meadows [21155]**

**Agent: Carter Jonas LLP (Brian Flynn) [17331]**

Summary: Paragraph 47 of the NPPF makes no provision for combined housing trajectories, and the responsibility for maintaining a five year housing supply rests with individual local planning authorities. Even where a joint plan is prepared each authority still retains overall responsibility for maintaining its own housing land supply. No alternatives to a joint housing trajectory have been considered by the Councils.

Until now no action has been taken to boost housing delivery, and the undersupply position is worsening year on year. The SC housing trajectory is currently overly optimistic in terms of delivery rates at some of the larger sites, and the housing that is actually delivered in the medium to long term will almost certainly be lower than currently predicted by the Council.

Change To Plan: We request that all references to a joint housing trajectory are deleted from Draft SCLP. We request that a more robust assessment of the sites is undertaken and the housing trajectory is adjusted accordingly.

Legally Compliant?: Not Specified

Full Reference: O - 65854 - 21155 - PM/SC/2/R - i, ii, iii, iv

## 65864 Object

**Respondent: Mr Roger Worboys [3125]**

**Agent: Carter Jonas LLP (Brian Flynn) [17331]**

Summary: Paragraph 47 of the NPPF makes no provision for combined housing trajectories, and the responsibility for maintaining a five year housing supply rests with individual local planning authorities. Even where a joint plan is prepared each authority still retains overall responsibility for maintaining its own housing land supply. No alternatives to a joint housing trajectory have been considered by the Councils.

Until now no action has been taken to boost housing delivery, and the undersupply position is worsening year on year. The SC housing trajectory is currently overly optimistic in terms of delivery rates at some of the larger sites, and the housing that is actually delivered in the medium to long term will almost certainly be lower than currently predicted by the Council.

Change To Plan: We request that all references to a joint housing trajectory are deleted from Draft SCLP. We request that a more robust assessment of the sites is undertaken and the housing trajectory is adjusted accordingly.

Legally Compliant?: Not Specified

Full Reference: O - 65864 - 3125 - PM/SC/2/R - i, ii, iii, iv

## 65880 Object

**Respondent: Waterbeach Parish Council (Liz Jones) [17084]**

**Agent: N/A**

Summary: SCDC ignored Inspectors that 3 new settlements difficult to sustain, removed staged delivery and no guarantee any will be successful. Contradicts 1st core principle of NPPF - all development should be Plan Led.

New settlements most expensive way to increase housing provision - no increase in benefit for occupiers waste of Taxpayers money.

Develop in A428 and A14 corridors before A10 as cost less to deliver - £428M infrastructure for Waterbeach (£100M more than Bourn and Northstowe combined).

Northstowe well advanced, has Guided Bus which can call at new Chesterton Station. Bourn access to A428, unlike A10, has capacity for traffic growth.

No recognised strategy for delivery of transport infrastructure in A10 corridor.

Any advance of development at Waterbeach or Bourn may put at risk delivery and success of Northstowe which is flagship settlement.

Waterbeach PC undertook their own survey locally and received 242 returned questionnaires; the responses and summary are attached as evidence.

Change To Plan:

Legally Compliant?: Not Specified

Full Reference: O - 65880 - 17084 - PM/SC/2/R - None

## 65884 Object

**Respondent: Waterbeach Parish Council (Liz Jones) [17084]**

**Agent: N/A**

Summary: The delivery of New settlements in particular but also the Revised LDF as a whole must be considered unsound due to the significant potential for underfunding as identified in the Infrastructure Delivery Study Update 2013.

Cambridge has a predicted finance shortfall of £207m over the plan period.

And South Cambs £1.3 Billion.

The plan need to show how this gap may be closed before any commitment is given to commence development in already congested area's.

Waterbeach PC undertook their own survey locally and received 242 returned questionnaires; the responses and summary are attached as evidence.

Change To Plan:

Legally Compliant?: Not Specified

Full Reference: O - 65884 - 17084 - PM/SC/2/R - None

## 65933 Object

**Respondent: The Quay Estate [25458]**

**Agent: Carter Jonas LLP (Mr Richard Seamark) [15727]**

Summary: Paragraph 47 of the NPPF makes no provision for joint housing trajectories. The responsibility for maintaining a five year housing land supply rests with individual local planning authorities. It is not clear what action Cambridge City Council could take if there is a housing shortfall against the joint housing trajectory caused by the failure to deliver development at the proposed new settlements in South Cambridgeshire. The joint housing trajectory has not been assessed against sustainability objectives, no alternatives have been considered. We do not believe that SCDC's predictions of housing completions will be accurate.

Change To Plan: We request that all references to a joint housing trajectory are deleted from Draft SCLP. We request that a more robust assessment of the sites is undertaken and the housing trajectory is adjusted accordingly.

Legally Compliant?: Not Specified

Full Reference: O - 65933 - 25458 - PM/SC/2/R - i, ii, iii, iv

## 65953 Object

**Respondent: Bloor Homes Eastern [16420]**

**Agent: Pegasus Planning Group (Nicky Parsons) [15818]**

Summary: Joint trajectory is response to South Cambridgeshire cannot maintain five year housing land supply until several years into Plan period. Previously highlighted opportunity to allocate sites in sustainable rural settlements to boost housing supply in early years - consistent with NPPF.

Joint trajectory means neither plan could stand 'on its own two feet', raising further concerns over soundness of approach. Table C1 shows, Cambridge City not need to rely on joint trajectory.

Inconsistent with NPPF - South Cambridgeshire unable to comply with Paragraph 49. Not effective - joint trajectory attracts significant risk and means neither authority can demonstrate its own five year housing land supply. Risk is without justification, since South Cambridgeshire could adopt an alternative approach which would enable it to meet its needs at the start of the plan period and negate the need for a joint trajectory at all.

Change To Plan: We therefore request that the joint trajectory is deleted and both Plans use their own trajectories. To enable South Cambridgeshire to demonstrate a rolling five year supply of land, more sites should be allocated in sustainable village locations to enable flexible and prompt delivery of new homes.

Legally Compliant?: Not Specified

Full Reference: O - 65953 - 16420 - PM/SC/2/R - None

## 65975 Object

**Respondent: Hallmark Hotels (Bar Hill) Ltd [25472]**

**Agent: CgMs (Matthew Roe) [25471]**

Summary: We do not agree with modification PM/SC/2R. We would support a more holistic approach to housing delivery across administrative borders. We consider that housing delivery for South Cambridgeshire should not be focused in the latter part of the plan period.

The proposed site is in a highly sustainable location on the edge of an existing village. The village has amenities and facilities which support the current population and have been identified as able to support an increase in population, and is easily accessible by both public transport and private car from surrounding villages and Cambridge City.

Development would benefit the local community and provide 41 housing units of mixed size and tenure. This proposal therefore is able to deliver a number of houses in the short term in order to meet the objectively assessed need in South Cambridgeshire as well as ensure the longevity and sustainability of the village.

Change To Plan:

Legally Compliant?: Not Specified

Full Reference: O - 65975 - 25472 - PM/SC/2/R - None

## 65987 Object

**Respondent: Scott Properties [25474]**

**Agent: Barton Willmore (Lauren Dooley) [25473]**

Summary: Housing Land Supply: Two recent appeals in South Cambridgeshire concluded that the Council could only demonstrate either 3.5 years or 3.9 years depending on whether housing supply was calculated using the Sedgfield or Liverpool method. The further work carried out on Objectively Assessed Need by PBA has a minimal impact on the Council's position. The Council's current claimed position as set out in the November 2015 Housing Land Supply Paper suggest that they can demonstrate a five year housing land supply under only one scenario (Liverpool with 5% buffer - 5.1 years). This provides a strong indication that additional housing is required to meet OAN.

Change To Plan:

Legally Compliant?: Not Specified

Full Reference: O - 65987 - 25474 - PM/SC/2/R - None

## 66015 Object

**Respondent: Commercial Estates Group [17653]**

**Agent: Nathaniel Lichfield & Partners (Mr Matthew Spry) [20555]**

Summary: Notwithstanding discussions in Examination sessions to date, modifications do not include a clear commitment to an early review of Plans in 2019.

CEG also notes that Council does not explain why modification is justified (based on evidence) in the reasons for this main modification.

If Plans are to progress based on a joint housing trajectory, this must only be on basis of a clear commitment to an early review, which will include a further review of Cambridge Green Belt given concerns regarding methodology and outcome of Green Belt reviews undertaken to date (see accompanying technical notes).

This representation is supported by a range of technical papers which form part of and support this representation.

Relevant Attachment  
Cambridge South East 1.4 3.19-3.23  
All Appendices and 2(OAHN) and 3(Green Belt) in particular.

Change To Plan: Amend modification

Legally Compliant?: Not Specified

Full Reference: O - 66015 - 17653 - PM/SC/2/R - i, ii, iii, iv

## 66047 Object

**Respondent: Gladman Developments (Nicole Penfold) [19878]**

**Agent: N/A**

Summary: Object to Councils' proposal to assess housing trajectories for both authorities together for purposes of housing delivery and calculation of five year housing land supply. Particularly pertinent as South Cambridgeshire currently unable to demonstrate existence of 5 year housing land supply within district. Inspectors already stated a decision on a joint housing trajectory would not resolve issues regarding calculation of five year supply, which is consistent with Inspector's view on Waterbeach appeal (APP/W0530/A/13/2207961). South Cambridgeshire plan cannot be found sound on basis of a housing supply of 3.9 years. Any plan must be able to demonstrate 5 year supply at point of adoption. Modifications relating to calculation of joint 5 Year supply should therefore be deleted - inconsistent with Framework. Each local planning authority should calculate their 5 year housing land supply on an individual basis.

(May result in consequential changes to Mods PM/SC/2/B, PM/SC/2/T)

Change To Plan:

Legally Compliant?: Not Specified

Full Reference: O - 66047 - 19878 - PM/SC/2/R - None

## 66083 Object

**Respondent: Hopkins Homes Limited (Robert Eburne) [25413]**

**Agent: N/A**

Summary: Object to reliance on New Settlements notwithstanding has been some movement towards growth in Rural Centres.

Proposed modifications fail to provide certainty about delivery. To guarantee delivery and de-risk delivery strategy while maximising growth earlier in plan period and partly accommodate past non delivery - allocate small to medium sites in villages with less propensity for delay, infrastructure constraints and technical complexity. Allocation of site SC255 would provide certainty, as first homes could be delivered by May 2018.

NPPF (Paras 54-55) and NPPG clear rural areas should be responsive to local circumstances and plan development to reflect local needs, particularly affordable housing, and enhance or maintain vitality of rural communities. Avoid blanket policies restricting development in some settlements and preventing settlements expanding should be avoided unless supported by robust evidence.

Change To Plan: Amend modification

Legally Compliant?: Not Specified

Full Reference: O - 66083 - 25413 - PM/SC/2/R - i, ii, iii, iv

## 66093 Object

**Respondent: Ely Diocesan Board of Finance [3062]**

**Agent: Carter Jonas LLP (Brian Flynn) [17331]**

Summary: Relevant sections of attached document: 22-24.

Contrary to NPPF paragraph 47, which makes no provision for joint trajectories. Even if it were a joint plan, authorities would still be responsible for their own housing need.

The joint trajectory is a negative response to the housing shortfall.

Not clear what action Cambridge City Council could take if there is a housing shortfall against the joint housing trajectory through under delivery in South Cambridgeshire. This would negatively affect affordable housing provision.

No action has been taken to boost delivery in South Cambridgeshire or remedy undersupply.

Change To Plan: We request that all references to a joint housing trajectory are deleted from Draft SCLP. We request that a more robust assessment of the sites is undertaken and the housing trajectory is adjusted accordingly.

Legally Compliant?: Not Specified

Full Reference: O - 66093 - 3062 - PM/SC/2/R - i, ii, iii, iv

## 66107 Object

**Respondent: Grosvenor Developments Ltd and USS [25482]**

**Agent: Savills (Mr Colin Campbell) [15804]**

Summary: Policy S/12 and combined trajectory does not accord with objective of a continuous high level of housing growth.

There is no justification for the approach - the NPPF requires that each LPA maintains a five year supply.

It will not be effective as it will have negative effects for the housing market

Change To Plan: Delete modification

Legally Compliant?: Not Specified

Full Reference: O - 66107 - 25482 - PM/SC/2/R - i, ii, iii, iv



## 66133 Object

**Respondent:** Cambridgeshire County Council - Strategic Assets Team [25478]

**Agent:** Carter Jonas LLP (Brian Flynn) [17331]

Summary: Relevant paragraphs of attached document: 25 to 29.

Contrary to NPPF paragraph 47, which makes no provision for joint trajectories. Even if it were a joint plan, authorities would still be responsible for their own housing need.

The Government is currently consulting on changes to the NPPF, including a proposed 'housing delivery test', dealing with the matter of how housing under-delivery should be tackled and whether a range of sites should be identified. It is likely that these changes to national policy will come into force before the Local Plan is adopted, and therefore a more robust assessment of sites included in the housing trajectory should be undertaken to ensure that they are deliverable in accordance with the predicted timetable, with realistic assumptions.

Change To Plan: We request that all references to a joint housing trajectory are deleted from Draft SCLP. We request that a more

Legally Compliant?: Not Specified

Full Reference: O - 66133 - 25478 - PM/SC/2/R - i, ii, iii, iv

## 66161 Object

**Respondent:** Shelford Investments Ltd [21149]

**Agent:** Carter Jonas LLP (Brian Flynn) [17331]

Summary: Relevant paragraphs in supporting document: 22 to 29

Disagree with joint trajectory for the following reasons:

\*Over-reliance on New Settlements, which will lead to delays in delivery and housing shortfall;

\*Contrary to paragraph 47 of the NPPF each council must retain overall responsibility for its own housing land supply;

\*what action Cambridge City Council could take if there is a housing shortfall against the joint housing trajectory caused by under-delivery in South Cambridgeshire;

\*No flexibility;

\*Inaccurate predictions in trajectory;

\*Not taken into account the Governments proposed 'housing delivery test';

\*Assessments on site delivery are not robust.

Change To Plan: We request that all references to a joint housing trajectory are deleted from Draft SCLP. We request that a more robust assessment of the sites is undertaken and the housing trajectory is adjusted accordingly.

Legally Compliant?: Not Specified

Full Reference: O - 66161 - 21149 - PM/SC/2/R - i, ii, iii, iv

## 66175 Object

**Respondent:** Great Shelford Ten Acres Limited [8948]

**Agent:** Bidwells (Mrs Stacey Rawlings) [3140]

Summary: Great Shelford (Ten Acres) Ltd object to the Proposed Modification to Policy S/12 increasing the Council's housing target by 500 homes to 19,500 dwellings. The Further Evidence in relation to the OAN to which the Proposed Modification refers is flawed and fails to fully consider economic trends.

Consequently, the Council's housing requirement is not founded on robust evidence prepared in a manner compliant with the NPPF and PPG. The Inspectors' concerns have not been fully addressed and the Council's Housing target still does not meet the OAN. The Proposed Modifications are therefore unsound as they are not:

\* positively prepared;

\* justified;

\* consistent with National Policy.

See attached documents:

\* PM\_SC\_2\_R.pdf

\* Critique of the Councils' Housing Land Supply.pdf

Change To Plan: Great Shelford (Ten Acres) Ltd therefore consider that the proposed housing requirement referred to in the Proposed Modifications to Policy S/12 should be increased to 17,930 dwellings and that further amendments should be made to the proposed wording of the paragraph to reflect this.

This revised approach would enable the Council to meet the objectively assessed housing needs for Cambridge in full and boost significantly the supply of housing in accordance with the NPPF paragraphs 47 and 159 such that the Plan is Sound.

Legally Compliant?: Not Specified

Full Reference: O - 66175 - 8948 - PM/SC/2/R - i, ii, iv

## 66202 Object

**Respondent: MCA Developments Limited [3652]**

**Agent: Barton Willmore (Mr Steven Kosky) [3212]**

Summary: Section 3 - Joint Housing Trajectory considered to be fundamentally flawed.

Primary flaw is that it is contrived, as MOU appears to mainly exist because, given its track record, now necessary for South Cambridgeshire to amalgamate future housing delivery with that of a more successful authority to avoid need for step change in long term spatial strategy of rural restraint and to avoid requirement to allocate further sites at larger settlements.

Given significant difference in land values MCA are concerned that joint housing trajectory will exacerbate affordability issues within District. Approach is predicated on South Cambridgeshire exporting its unmet housing needs into significantly more expensive HMA.

MCA consider approach to be untenable, given current level of house price inflation in City

Change To Plan: Amend modification

Legally Compliant?: Not Specified

Full Reference: O - 66202 - 3652 - PM/SC/2/R - i, iii, iv

## 66209 Object

**Respondent: North Barton Road Land Owners Group [21302]**

**Agent: Carter Jonas LLP (Brian Flynn) [17331]**

Summary: SCDC's predictions of housing completions will be accurate; historic monitoring data demonstrates lower than predicted completion rates.

There is a consistent history that less housing is actually delivered than is predicted to be delivered.

The undersupply position is worsening year on year.

The Council's housing trajectory should be treated with caution and is highly likely to be overly optimistic.

Relevant attachments:

-Jan Representations OAN (25.01.16).pdf

-Table South Cambridgeshire Housing Predictions Recorded Completions.pdf

-North BRLOG LP Mods Jan 2016.pdf : Paragraphs 61 to 66.pdf

Change To Plan: We request that all references to a joint housing trajectory are deleted from Draft SCLP. We request that a more robust assessment of the sites is undertaken and the housing trajectory is adjusted accordingly.

Legally Compliant?: Not Specified

Full Reference: O - 66209 - 21302 - PM/SC/2/R - i, ii, iv

## 65710 Support

**Respondent: The Taylor Family & Countryside Properties (UK) Ltd [19841]**

**Agent: Andrew Martin - Planning Limited (Mr Andrew Martin) [16509]**

Summary: We support policy amendment to S/12 that confirms that the housing trajectories for Cambridge and South Cambridgeshire will be considered together for the purposes of phasing of housing delivery. This modification also confirms that housing sites are not to be deliberately phased. We question the necessity of this final sentence.

We support the removal of reference to Bourn Airfield not starting to deliver housing before 2022.

We support the approach to meeting the combined housing need across the Greater Cambridge area. This is consistent with the NPPG and duty to co-operate (paragraph 035).

Change To Plan:

Legally Compliant?: Not Specified

Full Reference: S - 65710 - 19841 - PM/SC/2/R - None

## 65737 Support

**Respondent:** RLW Estates [1284]

**Agent:** Boyer Planning (Matthew Clarke) [9069]

**Summary:** Support deletion of phasing restrictions at Waterbeach New Town at clause (a) and proposed addition of wording setting out that these sites are not deliberately phased. The Councils' statement that this will assist the achievement of positive planning, which would not result from retention of phasing restrictions, is supported.

It is also noted and welcomed that reference within the reasons for this proposed modifications is made to the views of the promoters of Waterbeach new settlement that development could commence sooner than had previously been stated in Policy S/12, along with acknowledgement that a cautious approach has been adopted within the Councils' housing trajectory.

Change To Plan:

Legally Compliant?: Not Specified

Full Reference: S - 65737 - 1284 - PM/SC/2/R - None

## 65762 Support

**Respondent:** Urban & Civic [24293]

**Agent:** David Lock Associates (Darren Bell) [24750]

**Summary:** Support Joint housing trajectory and agree the approach signals positive joint planning between authorities to deliver objectively assessed housing needs.

Trajectory shows cautious approach to delivery of new settlements (table SC4 (page 64) of the Housing Land Supply Update Report November 2015). Waterbeach is shown to commence delivery of new homes in 2022/23, 2,050 delivered in plan period, average annual delivery of 228 dwellings. Conservative approach less risky in relation to delivery of plan as a whole. Committed to earlier delivery of new homes, supporting facilities and infrastructure, and faster rate - Planning Performance Agreement between District Council, County Council and U&C regarding submission of outline planning application autumn 2016. First homes by 2019 and opportunities to deliver faster.

Change To Plan:

Legally Compliant?: Not Specified

Full Reference: S - 65762 - 24293 - PM/SC/2/R - None

## 65787 Support

**Respondent:** Historic England (Mr David Grech) [23622]

**Agent:** N/A

**Summary:** In respect of Housing Land Supply, Historic England has reviewed the revised housing allocation map (Figure 3.2) prepared by the Councils and again we do not wish to comment in detail on either the New Proposal site in the City or the New Proposal Site in SCDC.

Nor do we object to the main modifications proposed to the South Cambridgeshire Local Plan in respect of the Development Strategy as set out in paragraphs 2.42, 2.43, 2.44, 2.45 and 2.47. We positively support the main modification proposed to the South Cambridgeshire Local Plan in respect of the Development Strategy as set out in paragraph 2.46.

Change To Plan:

Legally Compliant?: Not Specified

Full Reference: S - 65787 - 23622 - PM/SC/2/R - None

**65256 Object**

**Respondent:** Dr C Grant [22459]

**Agent:** N/A

Summary: Deleting the phasing of new developments and removing all constraints on the speed of development of sites such as Waterbeach is not going to allow essential infrastructure to be in place before development thus severely impacting the quality of life of local residents and impacting businesses. Sites with existing improved road/guided bus links should be prioritised for development not Waterbeach.

Change To Plan: That the development of the proposed ew settlement sites is phased and development prioritised where there is already appropriate transport infrastructure and less potential problems with drainage and flooding issues.

Legally Compliant?: Yes

Full Reference: O - 65256 - 22459 - PM/SC/2/S - i, iii

**65350 Object**

**Respondent:** Mr Brian Williams [17286]

**Agent:** N/A

Summary: The New Settlement policy must develop the A428 and A14 corridors before the A10 Corridor as 428 cost much less to deliver and it makes no sense to commit £428M infrastructure cost for Waterbeach (Approx £100Million < Bourn and Nstowe combined) until we confirm the Plan on track to deliver by 2031. Also Northstowe is well advanced in planning, has the advantage of the Guided Bus from Huntingdon to Cambridge which can easily extend to call at the new Chesterton Station. Bourn has access to the A428 which unlike the A10 has capacity.

The delivery of New settlements in particular but also the Revised LDF as a whole must be considered unsound due to the significant potential for underfunding as identified in the Infrastructure Delivery Study Update 2013.

Cambridge has a predicted finance shortfall of £207m over the plan period. And South Cambs £1.3 Billion. The plan needs to show how this gap may be closed before any commitment is given to commence development in already congested areas.

There is still no recognised strategy for the delivery of transport infrastructure in the A10 corridor.

Any advance of development at Waterbeach or Bourn may put at risk the delivery and success of Northstowe which is the flagship settlement of SCDC.

Change To Plan: Concentrate on delivery of Northstowe and edge of Cambridge as more sustainable, cheaper and easier to deliver

Legally Compliant?: Yes

Full Reference: O - 65350 - 17286 - PM/SC/2/S - i, ii, iii, iv

**65351 Object**

**Respondent:** Mr Brian Williams [17286]

**Agent:** N/A

Summary: There is still no recognised strategy for the delivery of transport infrastructure in the A10 corridor.

Any advance of development at Waterbeach or Bourn may put at risk the delivery and success of Northstowe which is the flagship settlement of SCDC.

Change To Plan: Concentrate on Northstowe and edge of Cambridge as more sustainable, cheaper and easier to deliver

Legally Compliant?: Yes

Full Reference: O - 65351 - 17286 - PM/SC/2/S - i, ii, iii, iv

**65359 Object**

**Respondent:** Mr Brian Williams [17286]

**Agent:** N/A

Summary: The delivery of New settlements in particular but also the Revised LDF as a whole must be considered unsound due to the significant potential for underfunding as identified in the Infrastructure Delivery Study Update 2013.

Cambridge has a predicted finance shortfall of £207m over the plan period. And South Cambs £1.3 Billion. The plan needs to show how this gap may be closed before any commitment is given to commence development in already congested areas.

Change To Plan: No Change to plan

Legally Compliant?: Yes

Full Reference: O - 65359 - 17286 - PM/SC/2/S - i, ii, iii, iv

## 65404 Object

**Respondent: Lorraine Rogers [25350]**

**Agent: N/A**

Summary: Infrastructure needs to be in place before further development on this scale is in commenced.

Change To Plan: Infrastructure in place before development on this scale is commenced.

Legally Compliant?: No

Full Reference: O - 65404 - 25350 - PM/SC/2/S - iii

## 65460 Object

**Respondent: Pigeon Land & LIH [25320]**

**Agent: CODE Development Planners Ltd (Ms Karen Beech) [25295]**

Summary: 1. Seeking to bring forward the delivery of Waterbeach 2022 is not realistic given the amount of required infrastructure, the timescales that will be needed to acquire third party land for the infrastructure and the funding gap for this infrastructure, which was previously discussed at the examination but still remains despite the 2015 updated background technical reports.  
2. Development at Bourn Airfield is not sustainable and improvements to public transport infrastructure will only bring about a 6-7% modal shift resulting in a significant increase in car journeys as residents seek to access work, services and facilities in Cambridge.

Relevant documents:160125\_CSTpt.pdf

Executive summary

Section 1 - Introduction - para 1.1 to 1.6

Section 2 - OAHN & Housing Delivery - section 2.2 - para 2.2.1 to 2.2.5

Section 4 - Overall Development Strategy - para 4.1 to 4.5

Section 7 - Conclusions - para 7.1 to 7.6

Change To Plan: We consider that the proposed allocation at Bourn Airfield should be deleted.

The total number of dwellings from Waterbeach during the plan period should reduce from 2,050 to 1,100 and the start date for the development should be realistic. We estimated realistic commencement in our objections to the submission Local Plan as 2028/29 to take account of the significant highway and public transport infrastructure improvements required.

Legally Compliant?: Yes

Full Reference: O - 65460 - 25320 - PM/SC/2/S - i, ii, iii

## 65736 Object

**Respondent: Mrs Jane Williams [24698]**

**Agent: N/A**

Summary: Object for the following reasons:

\*Unrestricted build at Waterbeach New Town by 2031 is not sustainable or viable.

\*Waterbeach village is a Minor Rural Centre/Better Served Village.

\*Infrastructure not in place. A10 over capacity. Doctors/School already at capacity.

\*Overbearing on existing village development, on landowners/promoters working together landscape and ecology issues, where will build start on SS/5

\*Separation.

\*Develop Northstowe first.

Change To Plan:

Legally Compliant?: Not Specified

Full Reference: O - 65736 - 24698 - PM/SC/2/S - i, ii, iii, iv

## 65746 Object

**Respondent: Homes and Communities Agency (Paul Kitson) [15884]**

**Agent: N/A**

Summary: Infrastructure Delivery Study 2015 does not assess Northstowe Phase 3 as considered post plan period - may underestimate infrastructure demands. Member desire, HCA intention and Government housing agenda intend to speed up delivery.

Modification to remove phasing of Waterbeach and Bourn Airfield needs proper scrutiny to understand resulting impacts on delivery and competition at Northstowe and other allocated strategic sites. Though councils confident capital funding is available through City Deal, Inspectors also need to consider implementation and delivery of transport and other infrastructure improvements in context of competing demands were Northstowe, Waterbeach and Bourn Airfield to overlap. Will councils', and utility providers', resources cope with the delivery needs of all sites combined?

Change To Plan:

Legally Compliant?: Not Specified

Full Reference: O - 65746 - 15884 - PM/SC/2/S - None

## 65881 Object

**Respondent: Waterbeach Parish Council (Liz Jones) [17084]**

**Agent: N/A**

Summary: SCDC ignored Inspectors that 3 new settlements difficult to sustain, removed staged delivery and no guarantee any will be successful. Contradicts 1st core principle of NPPF - all development should be Plan Led.

New settlements most expensive way to increase housing provision - no increase in benefit for occupiers waste of Taxpayers money.

Develop in A428 and A14 corridors before A10 as cost less to deliver - £428M infrastructure for Waterbeach (£100M more than Bourn and Northstowe combined).

Northstowe well advanced, has Guided Bus which can call at new Chesterton Station. Bourn access to A428, unlike A10, has capacity for traffic growth.

No recognised strategy for delivery of transport infrastructure in A10 corridor.

Any advance of development at Waterbeach or Bourn may put at risk delivery and success of Northstowe which is flagship settlement.

Waterbeach PC undertook their own survey locally and received 242 returned questionnaires; the responses and summary are attached as evidence.

Change To Plan:

Legally Compliant?: Not Specified

Full Reference: O - 65881 - 17084 - PM/SC/2/S - None

## 65885 Object

**Respondent: Waterbeach Parish Council (Liz Jones) [17084]**

**Agent: N/A**

Summary: The delivery of New settlements in particular but also the Revised LDF as a whole must be considered unsound due to the significant potential for underfunding as identified in the Infrastructure Delivery Study Update 2013.

Cambridge has a predicted finance shortfall of £207m over the plan period.

And South Cambs £1.3 Billion.

The plan need to show how this gap may be closed before any commitment is given to commence development in already congested area's.

Waterbeach PC undertook their own survey locally and received 242 returned questionnaires; the responses and summary are attached as evidence.

Change To Plan:

Legally Compliant?: Not Specified

Full Reference: O - 65885 - 17084 - PM/SC/2/S - None

## 65988 Object

**Respondent: Scott Properties [25474]**

**Agent: Barton Willmore (Lauren Dooley) [25473]**

Summary: Housing Land Supply: Two recent appeals in South Cambridgeshire concluded that the Council could only demonstrate either 3.5 years or 3.9 years depending on whether housing supply was calculated using the Sedgfield or Liverpool method. The further work carried out on Objectively Assessed Need by PBA has a minimal impact on the Council's position. The Council's current claimed position as set out in the November 2015 Housing Land Supply Paper suggest that they can demonstrate a five year housing land supply under only one scenario (Liverpool with 5% buffer - 5.1 years). This provides a strong indication that additional housing is required to meet OAN.

Change To Plan:

Legally Compliant?: Not Specified

Full Reference: O - 65988 - 25474 - PM/SC/2/S - None

## 66031 Object

**Respondent: Martin Grant Homes Ltd & Harcourt Developments (UK) Ltd [21709]**

**Agent: Savills (Mr Andrew Raven) [18884]**

Summary: The changes proposed do not respond to the inspectors' letter. Clarification was requested as to the delivery of infrastructure and the sustainability of sites, particularly new settlements as opposed to sites on the edge of the urban area. It is unclear what infrastructure can actually be delivered at Bourn Airfield, and the provision of Park and Ride remains optional (i.e. it will not be delivered). There is no clear comparison of land at North Cambourne, linked to the existing settlement, as an alternative, despite clear advantages that this approach offers.

Change To Plan:

Legally Compliant?: No

Full Reference: O - 66031 - 21709 - PM/SC/2/S - i, ii, iii, iv

## 66203 Object

**Respondent: MCA Developments Limited [3652]**

**Agent: Barton Willmore (Mr Steven Kosky) [3212]**

Summary: Bringing forward phasing of Bourn Airfield so significantly, will force both sites to compete for same market share within same timeframe. Market capacity has its own level and most likely outcome will be reduction in anticipated delivery rates of both sites, with no net gains to overall housing trajectory.

Bourn Airfield will directly compete with existing Cambourne for inward investment and other resources at critical time in Cambourne's development, as established new settlement looks to reach more sustainable critical mass.

Advocate phasing of Bourn Airfield left unchanged, so if Inspector finds in favour of this allocation, it will come on line later in Plan Period, when likely to be most needed and where it will not be prejudicial to successful completion of Cambourne

Change To Plan: Amend modification

Legally Compliant?: Not Specified

Full Reference: O - 66203 - 3652 - PM/SC/2/S - i, iii, iv

## 65738 Support

**Respondent: RLW Estates [1284]**

**Agent: Boyer Planning (Matthew Clarke) [9069]**

Summary: RLW Estates supports the removal of the previous phasing restrictions at Waterbeach, and to the consequential deletion of references within supporting text at Para. 2.60 as set out above.

Change To Plan:

Legally Compliant?: Not Specified

Full Reference: S - 65738 - 1284 - PM/SC/2/S - None

**65320 Object**      **Respondent:** Barratt Eastern Counties and the North West Cambridge Consortium of Landowners [17788]      **Agent:** BIDWELLS LLP (MISS MARCIA WHITEHEAD) [25328]

Summary: We object to the Proposed Modification to Paragraph 2.61 increasing the Council's housing target by 500 homes to 19,500 dwellings. The Further Evidence in relation to the OAN to which the Proposed Modification refers is flawed and fails to fully consider economic trends.

Consequently, the Council's housing requirement is not founded on robust evidence prepared in a manner compliant with the NPPF and PPG. The Inspectors' concerns have not been fully addressed and the Council's Housing target still does not meet the OAN. The Proposed Modifications are therefore unsound as they are not:

- \* positively prepared;
- \* justified;
- \* consistent with National Policy.

Change To Plan: Paragraph 2.61 should be deleted and any shortfalls in the Council's housing land supply should be addressed through further allocations within the Plan.

It is considered that this revised approach would enable the Council to meet the objectively assessed housing needs for Cambridge in full and boost significantly the supply of housing in accordance with the requirements of Government guidance in the NPPF paragraphs 47 and 159. As such, this will ensure that the Plan is Sound.

Legally Compliant?: No

Full Reference: O - 65320 - 17788 - PM/SC/2/T - i, ii, iv

**65494 Object**      **Respondent:** Bidwells (Miss Marcia Whitehead) [17324]      **Agent:** Bidwells LLP (Alison Barnes) [25318]

Summary: Bidwells object to the Proposed Modification to Paragraph 2.61 increasing the Council's housing target by 500 homes to 19,500 dwellings. The Further Evidence in relation to the OAN to which the Proposed Modification refers is flawed and fails to fully consider economic trends.

The Council's housing requirement is not founded on robust evidence prepared in a manner compliant with the NPPF and PPG. The Inspectors' concerns have not been fully addressed and the Council's Housing target still does not meet the OAN. The Proposed Modifications are therefore unsound as they are not:

- \* positively prepared;
- \* justified;
- \* consistent with National Policy.

Change To Plan: Paragraph 2.61 should be deleted and any shortfalls in the Council's housing land supply should be addressed through further allocations within the Plan.

It is considered that this revised approach would enable the Council to meet the objectively assessed housing needs for Cambridge in full and boost significantly the supply of housing in accordance with the requirements of Government guidance in the NPPF paragraphs 47 and 159. As such, this will ensure that the Plan is Sound.

Legally Compliant?: No

Full Reference: O - 65494 - 17324 - PM/SC/2/T - i, ii, iv



**65538 Object**

**Respondent: Endurance Estates Limited [19174]**

**Agent: Bidwells LLP (Susan Chappell) [25316]**

Summary:

Endurance Estates object to the Proposed Modification to Paragraph 2.61 increasing the Council's housing target by 500 homes to 19,500 dwellings. The Further Evidence in relation to the OAN to which the Proposed Modification refers is flawed and fails to fully consider economic trends.

The Council's housing requirement is not founded on robust evidence prepared in a manner compliant with the NPPF and PPG. The Inspectors' concerns have not been fully addressed and the Council's Housing target still does not meet the OAN. The Proposed Modifications are unsound as they are not:

\* positively prepared;

\* justified;

\* consistent with National Policy.

Change To Plan:

Paragraph 2.61 should be deleted and any shortfalls in the Council's housing land supply should be addressed through further allocations within the Plan.

It is considered that this revised approach would enable the Council to meet the objectively assessed housing needs for Cambridge in full and boost significantly the supply of housing in accordance with the requirements of Government guidance in the NPPF paragraphs 47 and 159. As such, this will ensure that the Plan is Sound.

Legally Compliant?:

No

Full Reference:

O - 65538 - 19174 - PM/SC/2/T - i, ii, iv

**65574 Object**

**Respondent: Pigeon Land & LIH [25320]**

**Agent: CODE Development Planners Ltd (Ms Karen Beech) [25295]**

Summary:

We do not consider that Cambridge City and South Cambridgeshire should have a joint housing trajectory.

South Cambridgeshire and Cambridge City have separate local plans and should therefore in our view have separate housing trajectories.

This was confirmed by the inspector who considered two planning appeals at Waterbeach and said in the decision letter, dated 25 June 2014, that a joint housing trajectory would not be the correct approach.

Relevant documents:160125\_CSTpt.pdf

Executive summary

Section 1 - Introduction - para 1.1 to 1.6

Section 2 - OAHN & Housing Delivery - section 2.2 - para 2.2.1 to 2.2.5

Section 4 - Overall Development Strategy - para 4.1 to 4.5

Section 7 - Conclusions - para 7.1 to 7.6

Change To Plan:

Given that Cambridge City and South Cambridgeshire are preparing separate Local Plans, each should have their own housing trajectory.

Legally Compliant?:

Yes

Full Reference:

O - 65574 - 25320 - PM/SC/2/T - i, ii, iii

## 65610 Object

**Respondent: Pembroke College & the Balaam Family [21173]**

**Agent: Bidwells LLP (Susan Chappell) [25316]**

Summary: Pembroke & the Balaam Family object to the Proposed Modification to Paragraph 2.61 increasing the Council's housing target by 500 homes to 19,500 dwellings. The Further Evidence in relation to the OAN to which the Proposed Modification refers is flawed and fails to fully consider economic trends.

The Council's housing requirement is not founded on robust evidence prepared in a manner compliant with the NPPF and PPG. The Inspectors' concerns have not been fully addressed and the Council's Housing target still does not meet the OAN. Proposed Modifications are unsound as they are not:

- \* positively prepared;
- \* justified;
- \* consistent with National Policy.

Change To Plan: Paragraph 2.61 should be deleted and any shortfalls in the Council's housing land supply should be addressed through further allocations within the Plan.

It is considered that this revised approach would enable the Council to meet the objectively assessed housing needs for Cambridge in full and boost significantly the supply of housing in accordance with the requirements of Government guidance in the NPPF paragraphs 47 and 159. As such, this will ensure that the Plan is Sound.

Legally Compliant?: No

Full Reference: O - 65610 - 21173 - PM/SC/2/T - i, ii, iv

## 65618 Object

**Respondent: Unwins and Biggs [25382]**

**Agent: Bidwells LLP (Alison Barnes) [25318]**

Summary: Unwins and Biggs object to the Proposed Modification to Paragraph 2.61 increasing the Council's housing target by 500 homes to 19,500 dwellings. The Further Evidence in relation to the OAN to which the Proposed Modification refers is flawed and fails to fully consider economic trends.

The Council's housing requirement isn't founded on robust evidence prepared in a manner compliant with the NPPF and PPG. The Inspectors' concerns have not been fully addressed and the Council's Housing target still does not meet the OAN. The Proposed Modifications are therefore unsound as they are not:

- \* positively prepared;
- \* justified;
- \* consistent with National Policy.

Change To Plan: Paragraph 2.61 should be deleted and any shortfalls in the Council's housing land supply should be addressed through further allocations within the Plan.

It is considered that this revised approach would enable the Council to meet the objectively assessed housing needs for Cambridge in full and boost significantly the supply of housing in accordance with the requirements of Government guidance in the NPPF paragraphs 47 and 159. As such, this will ensure that the Plan is Sound.

Legally Compliant?: No

Full Reference: O - 65618 - 25382 - PM/SC/2/T - i, iv

## 65839 Object

**Respondent: CALA Homes (North Homes Counties) Ltd [25454]**

**Agent: Carter Jonas LLP (Brian Flynn) [17331]**

Summary: Paragraph 47 of the NPPF makes no provision for combined housing trajectories, and the responsibility for maintaining a five year housing supply rests with individual local planning authorities. Even where a joint plan is prepared each authority still retains overall responsibility for maintaining its own housing land supply. No alternatives to a joint housing trajectory have been considered by the Councils.

Until now no action has been taken to boost housing delivery, and the undersupply position is worsening year on year. The SC housing trajectory is currently overly optimistic in terms of delivery rates at some of the larger sites, and the housing that is actually delivered in the medium to long term will almost certainly be lower than currently predicted by the Council.

Change To Plan: We request that all references to a joint housing trajectory are deleted from Draft SCLP. We request that a more robust assessment of the sites is undertaken and the housing trajectory is adjusted accordingly.

Legally Compliant?: Not Specified

Full Reference: O - 65839 - 25454 - PM/SC/2/T - i, ii, iii, iv

## 65855 Object

**Respondent: Mr C Meadows [21155]**

**Agent: Carter Jonas LLP (Brian Flynn) [17331]**

Summary: Paragraph 47 of the NPPF makes no provision for combined housing trajectories, and the responsibility for maintaining a five year housing supply rests with individual local planning authorities. Even where a joint plan is prepared each authority still retains overall responsibility for maintaining its own housing land supply. No alternatives to a joint housing trajectory have been considered by the Councils.

Until now no action has been taken to boost housing delivery, and the undersupply position is worsening year on year. The SC housing trajectory is currently overly optimistic in terms of delivery rates at some of the larger sites, and the housing that is actually delivered in the medium to long term will almost certainly be lower than currently predicted by the Council.

Change To Plan: We request that all references to a joint housing trajectory are deleted from Draft SCLP. We request that a more robust assessment of the sites is undertaken and the housing trajectory is adjusted accordingly.

Legally Compliant?: Not Specified

Full Reference: O - 65855 - 21155 - PM/SC/2/T - i, ii, iii, iv

## 65865 Object

**Respondent: Mr Roger Worboys [3125]**

**Agent: Carter Jonas LLP (Brian Flynn) [17331]**

Summary: Paragraph 47 of the NPPF makes no provision for combined housing trajectories, and the responsibility for maintaining a five year housing supply rests with individual local planning authorities. Even where a joint plan is prepared each authority still retains overall responsibility for maintaining its own housing land supply. No alternatives to a joint housing trajectory have been considered by the Councils.

Until now no action has been taken to boost housing delivery, and the undersupply position is worsening year on year. The SC housing trajectory is currently overly optimistic in terms of delivery rates at some of the larger sites, and the housing that is actually delivered in the medium to long term will almost certainly be lower than currently predicted by the Council.

Change To Plan: We request that all references to a joint housing trajectory are deleted from Draft SCLP. We request that a more robust assessment of the sites is undertaken and the housing trajectory is adjusted accordingly.

Legally Compliant?: Not Specified

Full Reference: O - 65865 - 3125 - PM/SC/2/T - i, ii, iii, iv

## 65935 Object

**Respondent: The Quay Estate [25458]**

**Agent: Carter Jonas LLP (Mr Richard Seamark) [15727]**

Summary: Paragraph 47 of the NPPF makes no provision for joint housing trajectories. The responsibility for maintaining a five year housing land supply rests with individual local planning authorities. It is not clear what action Cambridge City Council could take if there is a housing shortfall against the joint housing trajectory caused by the failure to deliver development at the proposed new settlements in South Cambridgeshire. The joint housing trajectory has not been assessed against sustainability objectives, no alternatives have been considered. We do not believe that SCDC's predictions of housing completions will be accurate.

Change To Plan: We request that all references to a joint housing trajectory are deleted from Draft SCLP. We request that a more robust assessment of the sites is undertaken and the housing trajectory is adjusted accordingly.

Legally Compliant?: Not Specified

Full Reference: O - 65935 - 25458 - PM/SC/2/T - i, ii, iii, iv

## 65989 Object

**Respondent: Scott Properties [25474]**

**Agent: Barton Willmore (Lauren Dooley) [25473]**

Summary: Housing Land Supply: Two recent appeals in South Cambridgeshire concluded that the Council could only demonstrate either 3.5 years or 3.9 years depending on whether housing supply was calculated using the Sedgefield or Liverpool method. The further work carried out on Objectively Assessed Need by PBA has a minimal impact on the Council's position. The Council's current claimed position as set out in the November 2015 Housing Land Supply Paper suggest that they can demonstrate a five year housing land supply under only one scenario (Liverpool with 5% buffer - 5.1 years). This provides a strong indication that additional housing is required to meet OAN.

Change To Plan:

Legally Compliant?: Not Specified

Full Reference: O - 65989 - 25474 - PM/SC/2/T - None

## 66016 Object

**Respondent: Commercial Estates Group [17653]**

**Agent: Nathaniel Lichfield & Partners (Mr Matthew Spry) [20555]**

Summary: Notwithstanding discussions in Examination sessions to date, modifications do not include a clear commitment to an early review of Plans in 2019.

CEG also notes that Council does not explain why modification is justified (based on evidence) in the reasons for this main modification.

If Plans are to progress based on a joint housing trajectory, this must only be on basis of a clear commitment to an early review, which will include a further review of Cambridge Green Belt given concerns regarding methodology and outcome of Green Belt reviews undertaken to date (see accompanying technical notes).

This representation is supported by a range of technical papers which form part of and support this representation.

Relevant Attachment

Cambridge South East 1.4 3.19-3.23

All Appendices and 2(OAHN) and 3(Green Belt)in particular.

Change To Plan: Amend modification

Legally Compliant?: Not Specified

Full Reference: O - 66016 - 17653 - PM/SC/2/T - i, ii, iii, iv

## 66094 Object

**Respondent: Ely Diocesan Board of Finance [3062]**

**Agent: Carter Jonas LLP (Brian Flynn) [17331]**

Summary: Relevant sections of attached document: 22-26.

Contrary to NPPF paragraph 47, which makes no provision for joint trajectories. Even if it were a joint plan, authorities would still be responsible for their own housing need.

The joint trajectory is a negative response to the housing shortfall.

Not clear what action Cambridge City Council could take if there is a housing shortfall against the joint housing trajectory through under delivery in South Cambridgeshire. This would negatively affect affordable housing provision.

No action has been taken to boost delivery in South Cambridgeshire or remedy undersupply

Change To Plan: We request that all references to a joint housing trajectory are deleted from Draft SCLP. We request that a more robust assessment of the sites is undertaken and the housing trajectory is adjusted accordingly.

Legally Compliant?: Not Specified

Full Reference: O - 66094 - 3062 - PM/SC/2/T - i, ii, iii, iv

## 66162 Object

**Respondent: Shelford Investments Ltd [21149]**

**Agent: Carter Jonas LLP (Brian Flynn) [17331]**

Summary: Relevant paragraphs in supporting document: 20 to 29

Disagree with joint trajectory for the following reasons:

\*Over-reliance on New Settlements, which will lead to delays in delivery and housing shortfall;

\*Contrary to paragraph 47 of the NPPF each council must retain overall responsibility for its own housing land supply;

\*what action Cambridge City Council could take if there is a housing shortfall against the joint housing trajectory caused by under-delivery in South Cambridgeshire;

\*No flexibility;

\*Inaccurate predictions in trajectory;

\*Not taken into account the Governments proposed 'housing delivery test';

\*Assessments on site delivery are not robust. Belt release.

Change To Plan: We request that all references to a joint housing trajectory are deleted from Draft SCLP. We request that a more robust assessment of the sites is undertaken and the housing trajectory is adjusted accordingly.

Legally Compliant?: Not Specified

Full Reference: O - 66162 - 21149 - PM/SC/2/T - i, ii, iii, iv

## 66176 Object

**Respondent: Great Shelford Ten Acres Limited [8948]**

**Agent: Bidwells (Mrs Stacey Rawlings) [3140]**

Summary: We object to the Proposed Modification to Paragraph 2.61 increasing the Council's housing target by 500 homes to 19,500 dwellings. The Further Evidence in relation to the OAN to which the Proposed Modification refers is flawed and fails to fully consider economic trends. Consequently, the Council's housing requirement is not founded on robust evidence prepared in a manner compliant with the NPPF and PPG. The Inspectors' concerns have not been fully addressed and the Council's Housing target still does not meet the OAN. The Proposed Modifications are therefore unsound as they are not:

- \* positively prepared;
- \* justified;
- \* consistent with National Policy.

See attached documents:

- \* PM\_SC\_2\_T.pdf
- \* Critique of the Councils' Housing Land Supply.pdf

Change To Plan: We therefore consider that the proposed housing requirement referred to in the Proposed Modifications to Paragraph 2.61 should be increased to 17,930 dwellings and that further amendments should be made to the proposed wording of the paragraph to reflect this. This revised approach would enable the Council to meet the objectively assessed housing needs for Cambridge in full and boost significantly the supply of housing in accordance with the requirements of the NPPF paragraphs 47 and 159 such that the Plan is Sound.

Legally Compliant?: Not Specified

Full Reference: O - 66176 - 8948 - PM/SC/2/T - i, ii, iv

## 66204 Object

**Respondent: MCA Developments Limited [3652]**

**Agent: Barton Willmore (Mr Steven Kosky) [3212]**

Summary: Section 3 - Joint Housing Trajectory considered to be fundamentally flawed.

Primary flaw is that it is contrived, as MOU appears to mainly exist because, given its track record, now necessary for South Cambridgeshire to amalgamate future housing delivery with that of a more successful authority to avoid need for step change in long term spatial strategy of rural restraint and to avoid requirement to allocate further sites at larger settlements.

Given significant difference in land values MCA are concerned that joint housing trajectory will exacerbate affordability issues within District. Approach is predicated on South Cambridgeshire exporting its unmet housing needs into significantly more expensive HMA.

MCA consider approach to be untenable, given current level of house price inflation in City

Change To Plan: Amend modification

Legally Compliant?: Not Specified

Full Reference: O - 66204 - 3652 - PM/SC/2/T - i, iii, iv

## 66215 Object

**Respondent: North Barton Road Land Owners Group [21302]**

**Agent: Carter Jonas LLP (Brian Flynn) [17331]**

Summary: SCDC's predictions of housing completions will be accurate; historic monitoring data demonstrates lower than predicted completion rates. There is a consistent history that less housing is actually delivered than is predicted to be delivered. The undersupply position is worsening year on year. The Council's housing trajectory should be treated with caution and is highly likely to be overly optimistic.

Relevant attachments:

- Jan Representations OAN (25.01.16).pdf
- Table South Cambridgeshire Housing Predictions Recorded Completions.pdf
- North BRLOG LP Mods Jan 2016.pdf : Paragraphs 67 to 68.pdf

Change To Plan: We request that all references to a joint housing trajectory are deleted from Draft SCLP. We request that a more robust assessment of the sites is undertaken and the housing trajectory is adjusted accordingly.

Legally Compliant?: Not Specified

Full Reference: O - 66215 - 21302 - PM/SC/2/T - i, ii, iv

## 65711 Support

**Respondent:** The Taylor Family & Countryside Properties (UK) Ltd [19841]

**Agent:** Andrew Martin - Planning Limited (Mr Andrew Martin) [16509]

**Summary:** We support text on housing delivery that ensures consistency with proposed modification PM/SC/2/H. This conforms with requirements under the duty to co-operate and the NPPF call for flexibility.

**Change To Plan:**

**Legally Compliant?:** Not Specified

**Full Reference:** S - 65711 - 19841 - PM/SC/2/T - None

**CHAPTER:** Appendix C: Proposed main PM/SC/2/U  
modifications to the Submission

## 66205 Object

**Respondent:** MCA Developments Limited [3652]

**Agent:** Barton Willmore (Mr Steven Kosky) [3212]

**Summary:** Bringing forward phasing of Bourn Airfield so significantly, will force both sites to compete for same market share within same timeframe. Market capacity has its own level and most likely outcome will be reduction in anticipated delivery rates of both sites, with no net gains to overall housing trajectory.

Bourn Airfield will directly compete with existing Cambourne for inward investment and other resources at critical time in Cambourne's development, as established new settlement looks to reach more sustainable critical mass.

Advocate phasing of Bourn Airfield left unchanged, so if Inspector finds in favour of this allocation, it will come on line later in Plan Period, when likely to be most needed and where it will not be prejudicial to successful completion of Cambourne

**Change To Plan:** Amend modification

**Legally Compliant?:** Not Specified

**Full Reference:** O - 66205 - 3652 - PM/SC/2/U - i, iii, iv

## 65712 Support

**Respondent:** The Taylor Family & Countryside Properties (UK) Ltd [19841]

**Agent:** Andrew Martin - Planning Limited (Mr Andrew Martin) [16509]

**Summary:** We support text on housing delivery that ensures consistency with proposed modification PM/SC/2/H. This conforms with requirements under the duty to co-operate and the NPPF call for flexibility.

**Change To Plan:**

**Legally Compliant?:** Not Specified

**Full Reference:** S - 65712 - 19841 - PM/SC/2/U - None

**65397 Object**                      **Respondent: Dr Neil Blair [16668]**                      **Agent: N/A**

Summary: The original time scale and numbers of houses on Bourn Airfield (if it is required) should be kept to the original timing: Build not to start until 2022 and only 1700 houses to be constructed.

Change To Plan: Keep the number of dwellings and the time scale for Bourn Airfield as in this table.

Legally Compliant?: Yes

Full Reference: O - 65397 - 16668 - PM/SC/2/V - i, ii, iii

**65939 Object**                      **Respondent: Cambridge Past Present and Future (Ms Stacey Weiser) [20942]**                      **Agent: N/A**

Summary: CambridgePPF argues that the Forward Trajectory included in the submitted Local Plan as Figure 3 should be retained in appropriately amended form as it provided a good overview of the timescale envisaged by the Council that was easily comprehensible to the lay reader. Updated trajectories based on actual rates of delivery are a useful means of monitoring changes in the Council's expectations so they should also be published in the Annual Monitoring Report.

Change To Plan: Amend modification

Legally Compliant?: Not Specified

Full Reference: O - 65939 - 20942 - PM/SC/2/V - None

**65713 Support**                      **Respondent: The Taylor Family & Countryside Properties (UK) Ltd [19841]**                      **Agent: Andrew Martin - Planning Limited (Mr Andrew Martin) [16509]**

Summary: This modification proposes deletion of figure 3 - housing trajectory. We support the proposal to rely instead on the trajectory published / updated annually in the Councils Annual Monitoring Report.

Change To Plan:

Legally Compliant?: Not Specified

Full Reference: S - 65713 - 19841 - PM/SC/2/V - None

**Respondent:** Campaign to Protect Rural England (CPRE) (Miss Shirley Fieldhouse)  
[17302]

Summary: The land which is not to be allocated in this local plan period clearly still fulfils Green Belt purposes of preventing urban sprawl, coalescence and maintaining the setting of Cambridge. The Airport owners have made it clear that there is no reasonable chance of relocating its functions and that they wish to pursue the development of the existing businesses for the foreseeable future. In these circumstances we do not see the point in safeguarding the land for development and consider that it should be returned to the Green Belt.

Legally Compliant?: Yes

## 65450 Object

**Agent:** LDA Design (Mr Jon Alsop) [25196]

## Summary

The formulation of the words could suggest that the proposed allocations are subject to some conditionality, which is not necessary, does not appear to be the intention and which would create confusion about the allocation.

We therefore suggest that parts d. to f. of Policy 12, and their equivalent parts c. to e. of Policy SS/3, should be deleted, in that the planning application process (as recognised in the amended supporting text) is the proper place to ensure acceptable mitigation.

Legally Compliant?: Yes

## 65524 Object

**Agent:** N/A

Summary: Concerned about increasing number of houses North of Cherry Hinton to 1,200 (420 in our parish). 1,200 dwellings on WING development. Consider impacts of both together.

Infrastructure - Impact on local roads. New railway station, improved bus service and mitigate rat running traffic. Roundabout at Airport Way/Church Road and pedestrian crossing prior to development. New cycle/footpath along Coldhams Lane.

Separation - insufficient green separation between Teversham and Cherry Hinton.

Housing - WING falls short of 40% social housing. Meet full quota. Reflect rural nature. Housing with adequate room sizes, large gardens and green space.

Village Facilities - seek contributions towards community centre, sports and recreation facilities. No Doctors Surgery, Shop or Allotments in Teversham.

Schools - Consider capacity at existing schools before build new schools.

Change To Plan:

Legally Compliant?: Not Specified

Full Reference: O - 65524 - 6120 - PM/SC/3/A - None



## 66017 Object

**Respondent: Commercial Estates Group [17653]**

**Agent: Nathaniel Lichfield & Partners (Mr Matthew Spry) [20555]**

Summary: CEG has reviewed updated evidence base and remains concerned there is insufficient evidence to support spatial distribution of housing growth around Cambridge and South Cambridgeshire.

CEG would support Plans which maximise development on the edge of Cambridge in principle, but the latest transport and infrastructure studies do not support the chosen locations for housing development, including the additional allocation on Land North of Cherry Hinton.

Representation is supported by range of technical papers, including Technical Papers on Transport and Infrastructure (Appendices 4 and 5). Papers provide critique of latest assessments and sets out reasons why proposed transport strategy and infrastructure will not adequately support growth or deliver sustainable development.

Relevant Attachment  
Cambridge South East 1.4 Section 2  
Appendix 4(Transport) and 5(Infrastructure)

Change To Plan: Amend modification

Legally Compliant?: Not Specified

Full Reference: O - 66017 - 17653 - PM/SC/3/A - i, ii, iii, iv

## 65307 Support

**Respondent: Rustat Road Neighbourhood Association (Mr Roger Crabtree) [16745]**

**Agent: N/A**

Summary: We agree with this approach but the conditions stated must be robustly enforced

Change To Plan:

Legally Compliant?: Not Specified

Full Reference: S - 65307 - 16745 - PM/SC/3/A - None

## 65583 Support

**Respondent: Anglian Water Services Limited (Sue Bull) [15648]**

**Agent: N/A**

Summary: Please find attached RAG sheet summarising our views on serving the sites revised and included in the modifications.  
[Spreadsheet shows an overall RAG rating of Amber - Infrastructure and/or treatment upgrades required to serve proposed growth or diversion of assets may be required]

Change To Plan:

Legally Compliant?: Not Specified

Full Reference: S - 65583 - 15648 - PM/SC/3/A - None

## 65754 Support

**Respondent: Endurance Estates and Marshall Group Property [25444]**

**Agent: LDA Design (Mr Jon Alsop) [25196]**

Summary: Overall support for the proposed modifications set out in PM/CC/3/A and PM/SC/3/A.

Strongly support principle expressed in Part 2 e) of Policy 12 and Part 2 d) of Policy SS/3 concerning the preparation of a masterplan framework to provide cohesive overarching tool to inform subsequent applications.

Support Part 3 to provide a primary and secondary school, local centre, open space and spine road. Appendices 1 - 3 illustrate the overall context and sustainability of sites R47 and SS/3 1b).

Support Part 4 safeguarding land for the longer term.

Note and agree Part 5.

Support related amendments at Figure 7 and Inset C.

Change To Plan:

Legally Compliant?: Not Specified

Full Reference: S - 65754 - 25444 - PM/SC/3/A - None

65791 Support

**Respondent:** Historic England (Mr David Grech) [23622] **Agent:** N/A

Summary: In respect of Housing Land Supply, Historic England has reviewed the revised housing allocation map (Figure 3.2) prepared by the Councils and again we do not wish to comment in detail on either the New Proposal site in the City or the New Proposal Site in SCDC.

Nor do we object to the main modifications proposed to the South Cambridgeshire Local Plan in respect of the Development Strategy as set out in paragraphs 2.42, 2.43, 2.44, 2.45 and 2.47. We positively support the main modification proposed to the South Cambridgeshire Local Plan in respect of the Development Strategy as set out in paragraph 2.46.

Change To Plan:  
Legally Compliant?: Not Specified

Full Reference: S - 65791 - 23622 - PM/SC/3/A - None

65903 Support

**Respondent:** Cambridgeshire County Council (Juliet Richardson) [23747] **Agent:** N/A

Summary: Welcome proposed modifications and recognition of existing and growing demand for education provision in Cambridge. Impact of further housing development, especially east of City, forecast to lead to shortfall in education capacity during plan period.

Inclusion of specific requirements within policies for Cambridge East (R47 and SS/31b) for secondary and primary education is positive step. Requirement to ensure preparation of joint masterplan for these sites prior to development is supported. Will ensure County Council is able to effectively address its statutory requirements to secure education provision for residents of new developments and existing community.

School likely to be in advance of wider development of Cambridge East. Supportive of approach to amend expectation for schools to be part of local centre.

Taking site of sufficient size to deliver a secondary school has potential to adversely impact wider viability and other policy requirements, e.g. affordable housing. Endorse securing school playing fields outside developable areas, including within Green Belt.

Change To Plan:  
Legally Compliant?: Not Specified  
Full Reference: S - 65903 - 23747 - PM/SC/3/A - None

65940 Support

**Respondent:** Cambridge Past Present and Future (Ms Stacey Weiser) [20942] **Agent:** N/A

Summary: CambridgePPF supports the inclusion of the additional land North of Cherry Hinton which could deliver some 420 new homes during the plan period. This was one of the sites we proposed as alternatives to the release of Green Belt land at City sites GB1 and GB2. This argument still applies.

Change To Plan:  
Legally Compliant?: Not Specified

Full Reference: S - 65940 - 20942 - PM/SC/3/A - None

66018 Object

Respondent: Commercial Estates Group [17653]

Agent: Nathaniel Lichfield & Partners (Mr Matthew Spry) [20555]

Summary: CEG has reviewed updated evidence base and remains concerned there is insufficient evidence to support spatial distribution of housing growth around Cambridge and South Cambridgeshire.

Latest transport and infrastructure studies do not support chosen locations for housing, including Land North of Cherry Hinton. Support Plans which maximise development on edge of Cambridge in principle, but insufficient transport and infrastructure evidence to justify increased allocation in this location during plan period. CEG notes Council does not explain why increase is justified in the reasons for this main modification.

Representation is supported by range of technical papers, including Technical Papers on Transport and Infrastructure (Appendices 4 and 5). Papers provide critique of latest assessments and sets out reasons why proposed transport strategy and infrastructure will not adequately support growth or deliver sustainable development.

Relevant Attachment  
Cambridge South East 1.4 Section 2 and  
Appendix 4(Transport) and 5(Infrastructure)

Change To Plan: Amend modification

Legally Compliant?: Not Specified

Full Reference: O - 66018 - 17653 - PM/SC/3/D - i, ii, iii, iv

65904 Support

Respondent: Cambridgeshire County Council (Juliet Richardson) [23747]

Agent: N/A

Summary: Welcome proposed modifications and recognition of existing and growing demand for education provision in Cambridge. Impact of further housing development, especially east of City, forecast to lead to shortfall in education capacity during plan period.

Inclusion of specific requirements within policies for Cambridge East (R47 and SS/31b) for secondary and primary education is positive step. Requirement to ensure preparation of joint masterplan for these sites prior to development is supported. Will ensure County Council is able to effectively address its statutory requirements to secure education provision for residents of new developments and existing community.

School likely to be in advance of wider development of Cambridge East. Supportive of approach to amend expectation for schools to be part of local centre.

Taking site of sufficient size to deliver a secondary school has potential to adversely impact wider viability and other policy requirements, e.g. affordable housing. Endorse securing school playing fields outside developable areas, including within Green Belt.

Change To Plan:

Legally Compliant?: Not Specified

Full Reference: S - 65904 - 23747 - PM/SC/3/D - None

65905 Support

Respondent: Cambridgeshire County Council (Juliet Richardson) [23747] Agent: N/A

Summary: Welcome proposed modifications and recognition of existing and growing demand for education provision in Cambridge. Impact of further housing development, especially east of City, forecast to lead to shortfall in education capacity during plan period.

Inclusion of specific requirements within policies for Cambridge East (R47 and SS/31b) for secondary and primary education is positive step. Requirement to ensure preparation of joint masterplan for these sites prior to development is supported. Will ensure County Council is able to effectively address its statutory requirements to secure education provision for residents of new developments and existing community.

School likely to be in advance of wider development of Cambridge East. Supportive of approach to amend expectation for schools to be part of local centre.

Taking site of sufficient size to deliver a secondary school has potential to adversely impact wider viability and other policy requirements, e.g. affordable housing. Endorse securing school playing fields outside developable areas, including within Green Belt.

Change To Plan:

Legally Compliant?: Not Specified

Full Reference: S - 65905 - 23747 - PM/SC/3/E - None

**65417 Object**

**Respondent: Pigeon Land & LIH [25320]**

**Agent: CODE Development Planners Ltd (Ms Karen Beech) [25295]**

Summary: 1. Land south of CBC is provisionally allocated for employment but we are unable to find any evidence to explain the exceptional circumstances justifying the release of this land from the Green Belt.  
2. Further investigation will be required and we look forward to reviewing the results of the council's further consideration of the delivery and sustainability of the provisional allocation on the CBC extension.  
3. The provisional allocation of land to the south of CBC is not sufficient to meet the needs of the bio-medical and healthcare life sciences research needing to be located in close proximity to CBC and Addenbrooke's.

Relevant sections of attached document:

Executive summary, Section 1 - Introduction - para 1.1 to 1.6, Section 6 - Provisional Allocation of Land for CBC Extension, Section 7 - Conclusions - para 7.1 to 7.6, Appendix 1, Appendix 5.

Change To Plan: A proper assessment to be undertaken of employment land requirements, supply and delivery for the specific employment sector of bio-medical, healthcare and life sciences requiring a location in close proximity to CBC and Addenbrooke's Hospital and the allocation of more land, such as Cambridge South, for medical based R&D employment use close to CBC and Addenbrooke's Hospital

Legally Compliant?: Yes

Full Reference: O - 65417 - 25320 - PM/SC/3/F - i, ii, iii, iv

**65722 Object**

**Respondent: David Blake [25352]**

**Agent: N/A**

Summary: Building on land within 30 metres of a nature reserve is unsustainable.

Change To Plan:

This modification to the plan should be deleted in its entirety, and all additional modifications relevant to this location should also be removed (e.g. PM/SC/2/P, PM/SC/8/A, PM/SC/8/B, PM/SC/3/F).

Legally Compliant?: Not Specified

Full Reference: O - 65722 - 25352 - PM/SC/3/F - None

**66020 Object**

**Respondent: Commercial Estates Group [17653]**

**Agent: Nathaniel Lichfield & Partners (Mr Matthew Spry) [20555]**

Summary: In relation to the provisional new release south of the Biomedical Campus, CEG objects to the Council's approach to defining boundaries which fail to provide clear and recognisable boundaries based on readily recognisable physical features which are likely to be permanent (NPPF para 85).

This representation is supported by a range of technical papers which form part of and support this representation.

Relevant Attachment

Cambridge South East 1.4 Section 2 and Appendix 3 (green Belt)

Change To Plan: Amend modification

Legally Compliant?: Not Specified

Full Reference: O - 66020 - 17653 - PM/SC/3/F - i, ii, iii, iv

**65782 Support**      **Respondent: Historic England (Mr David Grech) [23622]**      **Agent: N/A**

Summary: In respect of Housing Land Supply, Historic England has reviewed the revised housing allocation map (Figure 3.2) prepared by the Councils and again we do not wish to comment in detail on either the New Proposal site in the City or the New Proposal Site in SCDC.

Change To Plan:

Legally Compliant?: Not Specified

Full Reference: S - 65782 - 23622 - PM/SC/3/G - None

**65125 Object**                      **Respondent: Dr Roger Sewell [25099]**                      **Agent: N/A**

Summary: I would prefer to see the original wording retained, as it appropriately provides for discretion according to need and gives an indication of build trajectory anticipated.

Change To Plan: See the original wording retained.

Legally Compliant?: Yes

Full Reference: O - 65125 - 25099 - PM/SC/3/H - ii

**65236 Object**                      **Respondent: Mrs Katie Lucas [25305]**                      **Agent: N/A**

Summary: Early housing starts at Waterbeach will decouple population increase from infrastructure work which was previously promised, is already long overdue and still has no anticipated start date. Traffic on the A10 and at the Milton interchange (which is realistically the only way out of the new town) is already massively over-capacity for the road network.

More houses sooner will not improve this situation.

Change To Plan: Either the Waterbeach development must not be brought forward OR infrastructure development -- particularly redevelopment of the Milton A14/A10 interchange must also be brought foward.

Legally Compliant?: Yes

Full Reference: O - 65236 - 25305 - PM/SC/3/H - i

**65257 Object**                      **Respondent: Dr C Grant [22459]**                      **Agent: N/A**

Summary: Significant infrastructure improvements need to be completed before developent of Waterbeach new town is allowed. The plan supposedly addresses the need for local housing yet developers want to move the station which is morelikely to make the new development a desirable London commuter location. The station in its current location is heavily used by residents of Waterbeach and the surrounding area. Relocating it would probably decrease the amount of local housing the development would provide as many residents would commute to London (and growth of such commuting from Ely and stations further north) is evident.

Change To Plan: Any change to original phasing ie some 1400 houses in plan period must be contingent on infrastructure improvements being in place before the development is begun, and certainly before any housing is completed and ready for occupation. Without such proviso there is a significant chance that quality of life for many existing residents will be radically impacted.

Legally Compliant?: Yes

Full Reference: O - 65257 - 22459 - PM/SC/3/H - iii

**65317 Object**                      **Respondent: Mr Peter Johnson [23710]**                      **Agent: N/A**

Summary: To make this more flexible and allow building to happen earlier is a grave mistake. There is no indication that the funding will be available for the necessary infrastructure to be in place before building starts. Also to remove the limit of houses to be built is another error of judgement.

Change To Plan: I would like to see more effort put into getting Northstowe built and also Bourn as less work is needed for infrastructure such as better roads. If Waterbeach is unlucky enough to be considered for all these houses then the commitment to provide the infrastructure needed is there with money ring-fenced to do just that.

Legally Compliant?: Yes

Full Reference: O - 65317 - 23710 - PM/SC/3/H - i, ii, iii, iv

**65377 Object**                      **Respondent: Dr Michael Williamson [16775]**                      **Agent: N/A**

Summary: The removal of the timetable on Waterbeach New settlement as asked for by the promoters has not been, adequately thought through in respect of the sustainability of the approach, e.g. lead time for transport improvements in the A10 corridor.

Change To Plan: Restore the reference to 1,400 houses by 2031.

Legally Compliant?: Yes

Full Reference: O - 65377 - 16775 - PM/SC/3/H - i

## 65405 Object

**Respondent: Lorraine Rogers [25350]**

**Agent: N/A**

Summary: Infrastructure needs to be in place before the scale of development is shifted.

Change To Plan: Improvements and expansion of the infrastructure needs to start before building is escalated. The current roads and public transport provision cannot cope with the present capacity without adding more.

Legally Compliant?: No

Full Reference: O - 65405 - 25350 - PM/SC/3/H - iii

## 65461 Object

**Respondent: Pigeon Land & LIH [25320]**

**Agent: CODE Development Planners Ltd (Ms Karen Beech) [25295]**

Summary: 1. Seeking to bring forward the delivery of Waterbeach 2022 is not realistic given the amount of required infrastructure, the timescales that will be needed to acquire third party land for the infrastructure and the funding gap for this infrastructure, which was previously discussed at the examination but still remains despite the 2015 updated background technical reports.  
2. Development at Bourn Airfield is not sustainable and improvements to public transport infrastructure will only bring about a 6-7% modal shift resulting in a significant increase in car journeys as residents seek to access work, services and facilities in Cambridge.

Relevant documents:160125\_CSTpt.pdf

Executive summary

Section 1 - Introduction - para 1.1 to 1.6

Section 2 - OAHN & Housing Delivery - section 2.2 - para 2.2.1 to 2.2.5

Section 4 - Overall Development Strategy - para 4.1 to 4.5

Section 7 - Conclusions - para 7.1 to 7.6

Change To Plan: We consider that the proposed allocation at Bourn Airfield should be deleted.

The total number of dwellings from Waterbeach during the plan period should reduce from 2,050 to 1,100 and the start date for the development should be realistic. We estimated realistic commencement in our objections to the submission Local Plan as 2028/29 to take account of the significant highway and public transport infrastructure improvements required.

Legally Compliant?: Yes

Full Reference: O - 65461 - 25320 - PM/SC/3/H - i, ii, iii

## 65476 Object

**Respondent: Waterbeach Parish Council (Liz Jones) [17084]**

**Agent: N/A**

Summary: While Waterbeach Parish Council oppose the building of a large new settlement on the former airfield and additional agricultural land, they recognise that the development may be inevitable. However, if that development is to take place, the promoters cannot be allowed to deliver a substantial number of dwellings until the necessary road improvements are made. As pointed out above, the load on the A10 has increased and is expected to increase further with the substantial developments included in the East Cambridgeshire Local Plan, and additional development at Waterbeach is bound to worsen the problem.

Change To Plan: In the Parish Council's view, it is therefore essential that a clear statement be included in the Local Plan that only minimal development should be permitted at Waterbeach until the improvements listed in Table 1 attached are substantially complete. It is quite unacceptable to remove the condition in PM/SC/3/H: No more than 1,400 dwellings will be completed by 2031, except as may be agreed by the Local Planning Authority to be necessary to maintain a 5-year supply of deliverable housing sites. without replacing this with some reference to the essential transport improvements. Waterbeach Parish Council cannot see how the inspector's requirements as stated in her letter previously cited are complied with.

Legally Compliant?: No

Full Reference: O - 65476 - 17084 - PM/SC/3/H - i, ii, iii



## 65620 Object

**Respondent: Cllr James Hockney [18721]**

**Agent: N/A**

Summary: The removal of the restriction on the level of quantum and timelines is not a strategic approach.

At the Full Council meeting I raised specific concerns on the delivery of infrastructure. It is very unclear whether there is sufficient funding in place that is required to bring this development forward.

The change could lead to a much higher level of quantum in terms of house building in the Local Plan period.

Change To Plan: Clarity on timelines, level of quantum and infrastructure funding.

Legally Compliant?: No

Full Reference: O - 65620 - 18721 - PM/SC/3/H - i, ii

## 65669 Object

**Respondent: Barbara Bull [18633]**

**Agent: N/A**

Summary: I object, I think that no more than 1400 dwellings should be completed by 2031. There isn't any infrastructure in place to cope with unlimited development.

Change To Plan: I would like to see the A10 drastically improved, the transport system in general improved so as to cope with any new developments so that the whole transport system for Waterbeach doesn't become totally gridlocked.

Legally Compliant?: No

Full Reference: O - 65669 - 18633 - PM/SC/3/H - i, ii, iii, iv

## 65955 Object

**Respondent: Bloor Homes Eastern [16420]**

**Agent: Pegasus Planning Group (Nicky Parsons) [15818]**

Summary: Provides flexibility but does not address new settlements reliance on infrastructure; significant funding gap. Plan remains ineffective; no certainty new settlements can be delivered as planned, or at all within plan period.

Revised Housing Trajectory indicates Waterbeach starts from 2022; within year of Bourn Airfield and four of Cambourne West; both rely on infrastructure enhancement along A428. Two significant infrastructure packages required around same time; competing pressures on funding and resources.

A10 corridor enhancements not until at least 2023. Trajectory indicates development without necessary infrastructure projects having started. City Deal Programme and LTTS optimistic.

Development Strategy Update suggests interim measures could be taken to alleviate pressure on infrastructure; no detail.

Change to strategy necessary; additional sites in villages. Boost delivery earlier and without substantial infrastructure. Sites at Swavesey and Over well-connected with Guided Busway and good range of local facilities.

Change To Plan: Therefore, given that it remains uncertain whether the significant infrastructure necessary to support the new settlements can come forward in accordance with the Local Plan's timescales, the proposed modification does not address the ineffectiveness of the Plan. We request that additional sites are allocated in rural areas where they can contribute towards the achievement of sustainable development and where they can benefit from pre-existing infrastructure and services such as the Guided Busway.

Legally Compliant?: Not Specified

Full Reference: O - 65955 - 16420 - PM/SC/3/H - None

## 65175 Support

**Respondent:** Dr Jane Williamson [15997]

**Agent:** N/A

**Summary:** It would be unrealistic, uneconomic and a waste of land resources not to put the former barracks site to good use for much needed housing.. HOWEVER if the quality of life of local residents AND newcomers is not to be compromised, it is essential that steps are taken provide infrastructure improvements especially for transport, before building starts. At peak times the A10 is already supersaturated and traffic through Waterbeach is on an urban scale Increasing numbers of cars parked by rail users are creating real problems and trains are becoming dangerously overcrowded.

Change To Plan:

Legally Compliant?: Not Specified

Full Reference: S - 65175 - 15997 - PM/SC/3/H - None

## 65591 Support

**Respondent:** Anglian Water Services Limited (Sue Bull) [15648]

**Agent:** N/A

**Summary:** 2.43 - Providing necessary infrastructure is in place to serve the proposed development Anglian Water would have no issue with the flexibility in the start date of delivery of new settlements.

Change To Plan:

Legally Compliant?: Not Specified

Full Reference: S - 65591 - 15648 - PM/SC/3/H - None

## 65740 Support

**Respondent:** RLW Estates [1284]

**Agent:** Boyer Planning (Matthew Clarke) [9069]

**Summary:** Support amendment to Policy SS/5, clause (5), removing reference to restricting development to 1,400 dwellings by 2031. Positive approach will assist delivery of continuous supply of housing, given delivery will continue beyond plan period, and provides flexibility to respond to changing circumstances.

Preparation of Development Framework, governed by series of Planning Performance Agreements between site promoters and SCDC.

Anticipate submission of initial planning applications in late 2016 and completions in 2020/21 / sooner. At least 4,300 dwellings by 2031. Earlier, and a higher level of development, than the Council's cautious assumptions within their latest housing trajectory.

But missed opportunities to change SS/5:

- \* Northern limit to development
- \* Overall dwelling capacity
- \* Alter references for need for AAP
- \* To refer to / clarify role of Neighbourhood Plan

Change To Plan:

Legally Compliant?: Not Specified

Full Reference: S - 65740 - 1284 - PM/SC/3/H - None

## 65765 Support

**Respondent:** Urban & Civic [24293]

**Agent:** David Lock Associates (Darren Bell) [24750]

**Summary:** Urban&Civic (U&C) support the proposed removal of the phasing restrictions to Waterbeach new town in policies S/6, S/12 and Policy SS/5. The wording sought to limit development to no more than 1,400 dwellings in the plan period and development to commence no earlier than 2026. U&C agrees with the Council that the change would signal a more positively prepared justified and effective Local Plan, and one consistent with national policy in being flexible to change and supportive of sustainable development. This is further supported by recent Government consultation on draft changes to the NPPF in that a presumption in favour of development on brownfield land is suggested and local planning authorities are expected planning positively for large scale residential development, including new settlements.

Good progress is being made on Waterbeach new town. U&C and RLW Estates Limited are working together to prepare a Development Framework Document (DFD) to support the delivery of the new settlement by demonstrating the key design and development principles. Waterbeach Parish Council is at the early stage of preparing a neighbourhood plan and the DFD is also intended to assist in this process. In parallel, U&C is preparing a planning application on the former barracks and airfield site and a Planning Performance Agreement has been drafted with South Cambridgeshire District Council and Cambridgeshire County Council.

Change To Plan:

Legally Compliant?: Not Specified

Full Reference: S - 65765 - 24293 - PM/SC/3/H - None

65789 Support

Respondent: Historic England (Mr David Grech) [23622]

Agent: N/A

Summary: In respect of Housing Land Supply, Historic England has reviewed the revised housing allocation map (Figure 3.2) prepared by the Councils and again we do not wish to comment in detail on either the New Proposal site in the City or the New Proposal Site in SCDC.

Nor do we object to the main modifications proposed to the South Cambridgeshire Local Plan in respect of the Development Strategy as set out in paragraphs 2.42, 2.43, 2.44, 2.45 and 2.47. We positively support the main modification proposed to the South Cambridgeshire Local Plan in respect of the Development Strategy as set out in paragraph 2.46.

Change To Plan:

Legally Compliant?: Not Specified

Full Reference: S - 65789 - 23622 - PM/SC/3/H - None

66207 Support

Respondent: MCA Developments Limited [3652]

Agent: Barton Willmore (Mr Steven Kosky) [3212]

Summary: MCA does not object to this change in principle, as the rest of Waterbeach will need a long lead in time in any event, before any significant delivery of the new settlement can take place. In addition, given its location north of the City, the primary market competition will mostly come from Northstowe, which is now under construction, but lies further west.

Change To Plan:

Legally Compliant?: Not Specified

Full Reference: S - 66207 - 3652 - PM/SC/3/H - None

**65126 Object**                      **Respondent: Dr Roger Sewell [25099]**                      **Agent: N/A**

Summary: I would prefer to see the original wording retained, as it provides both for discretion according to need and gives an indication of anticipated build trajectory.

Change To Plan: See the original wording retained.

Legally Compliant?: Yes

Full Reference: O - 65126 - 25099 - PM/SC/3/I - ii

**65277 Object**                      **Respondent: Dr Neil Blair [16668]**                      **Agent: N/A**

Summary: If Cambourne West is to be constructed, then there is no need for Bourn Airfield. If Bourn Airfield is to proceed, then it should be as in the original LDP i.e. building commencing in 2022 with up to 1700 houses.

The Bourn Airfield Development has been brought forward from later in the LDP to starting sooner. With the concurrent development of West Cambourne, this would cause significant traffic and environmental issues to local residents.

Change To Plan: 1. No construction on Bourn Airfield  
2. If it must go ahead, delay the construction until later in the plan (2022) as originally proposed in the LDP  
3.Retain the wording of the original document.

Legally Compliant?: Yes

Full Reference: O - 65277 - 16668 - PM/SC/3/I - None

**65398 Object**                      **Respondent: Dr Neil Blair [16668]**                      **Agent: N/A**

Summary: If Cambourne West is to be constructed, then there is no need for Bourn Airfield. If Bourn Airfield is to proceed, then it should be as in the original LDP i.e. building commencing in 2022 with up to 1700 houses.

Change To Plan: Retain the wording of the original document.

Legally Compliant?: Yes

Full Reference: O - 65398 - 16668 - PM/SC/3/I - i, ii, iii

**65422 Object**                      **Respondent: Mrs Sally Hildrew [23248]**                      **Agent: N/A**

Summary: There is no logic in bringing forward the development of this site and I do not understand why this change has been made.

Change To Plan: The amendment should be removed so that, should the development go ahead, it will be within the original time frame.

Legally Compliant?: Yes

Full Reference: O - 65422 - 23248 - PM/SC/3/I - ii

**65429 Object**                      **Respondent: Mr Ian Hildrew [23247]**                      **Agent: N/A**

Summary: Just because someone fancies building earlier does not mean that it is a good idea. There is no reason for this change

Change To Plan: Keep to existing timescales if this development goes ahead at all.

Legally Compliant?: No

Full Reference: O - 65429 - 23247 - PM/SC/3/I - ii

## 65463 Object

**Respondent: Pigeon Land & LIH [25320]**

**Agent: CODE Development Planners Ltd (Ms Karen Beech) [25295]**

Summary: 1. Seeking to bring forward the delivery of Waterbeach 2022 is not realistic given the amount of required infrastructure, the timescales that will be needed to acquire third party land for the infrastructure and the funding gap for this infrastructure, which was previously discussed at the examination but still remains despite the 2015 updated background technical reports.  
2. Development at Bourn Airfield is not sustainable and improvements to public transport infrastructure will only bring about a 6-7% modal shift resulting in a significant increase in car journeys as residents seek to access work, services and facilities in Cambridge.

Relevant documents:160125\_CSTpt.pdf

Executive summary

Section 1 - Introduction - para 1.1 to 1.6

Section 2 - OAHN & Housing Delivery - section 2.2 - para 2.2.1 to 2.2.5

Section 4 - Overall Development Strategy - para 4.1 to 4.5

Section 7 - Conclusions - para 7.1 to 7.6

Change To Plan: We consider that the proposed allocation at Bourn Airfield should be deleted.  
The total number of dwellings from Waterbeach during the plan period should reduce from 2,050 to 1,100 and the start date for the development should be realistic. We estimated realistic commencement in our objections to the submission Local Plan as 2028/29 to take account of the significant highway and public transport infrastructure improvements required.

Legally Compliant?: Yes

Full Reference: O - 65463 - 25320 - PM/SC/3/I - i, ii, iii

## 65684 Object

**Respondent: Dr Shane Lawrence [19183]**

**Agent: N/A**

Summary: Bourn Airfield and other village areas that are designated in the modifications as submitted areas have been considered as liable to flooding in previous discussions in SCDC and elsewhere. Due to the evident and continued climate change and annual heavy rain fall such sites as allocations should be reconsidered as not suitable for development for obvious reasons. e.g. future weather patterns.  
This means that much more serious reconsiderations of all allocated areas and areas considered for allocation that are close to or possibly liable to heavy rain and flooding difficulty should be deleted from the proposed modifications.

Change To Plan: Delete modification.

Legally Compliant?: No

Full Reference: O - 65684 - 19183 - PM/SC/3/I - i, iv

## 65690 Object

**Respondent: Paul Beskeen [22409]**

**Agent: N/A**

Summary: The additional evidence and subsequent Main Modification's fail to address the Inspectors' concerns over the Local Plan's departure from the sustainable development principles set out in the Cambridge and South Cambridgeshire Sustainable Development Strategy Review (SDSR) and, in particular, its over-reliance on new settlements.

Change To Plan: Delete the modification.

Legally Compliant?: Not Specified

Full Reference: O - 65690 - 22409 - PM/SC/3/I - i, ii, iii

## 65715 Object

**Respondent:** The Taylor Family & Countryside Properties (UK) Ltd [19841]

**Agent:** Andrew Martin - Planning Limited (Mr Andrew Martin) [16509]

Summary: Objection is raised to the proposed retention of point 6 that requires an AAP to be prepared to establish a policy framework for the site and the proposal for it to address issues and requirements.

The preparation of an AAP is not consistent with the proposed modifications to increase flexibility and provide deliverable sites within the plan period and to contribute to the five year supply.

The designation of a major development area will artificially constrain the layout, instead of allowing the proposed development to respond to its surroundings.

Propose a change to Policy SS/6 to refer to a Development Framework / Masterplan to guide development and for this to be submitted for approval as part of the first planning application.

An AAP would take significantly longer to prepare and this would be contrary to the objective of other modifications to remove restrictions on the rates of development.

Change To Plan: Amend modification (see attached modification to Policy SS/6).

Legally Compliant?: Not Specified

Full Reference: O - 65715 - 19841 - PM/SC/3/I - iii

## 65743 Object

**Respondent:** Coalition of Parish Councils (Mr Steve Jones) [25442]

**Agent:** N/A

Summary: The consideration of reasonable alternatives is not rigorous and is based on mainly qualitative information. A more in-depth and quantitative appraisal of the two options (new settlements vs edge of city sites) should have been undertaken.

The appraisal of sites is too general and specific 'edge of city sites identified' as the new settlements were (West Cambourne, Bourn Airfield, Waterbeach), that way specific comparisons could be made and identify the 'cost' of protecting the Green Belt e.g.

\*number of trips and type,

\*vehicular carbon emissions,

\*cost of providing service and access to services,

cost of additional transport and infrastructure.

No explanation as to why the councils deviate from the subregional development strategy.

No discussion has been had as to whether the Development Strategy review should be updated to better align the councils' policies and practices.

Paragraphs 13 to 16 and 29 to 31 of supporting document,

Change To Plan: Amend modification. Reasons identified above.

Legally Compliant?: Not Specified

Full Reference: O - 65743 - 25442 - PM/SC/3/I - i, iii

## 65771 Object

**Respondent:** Mr Jonathan Burrell [22509]

**Agent:** N/A

Summary: The worst effects of the Bourn Airfield Development and West Cambourne are due to poor transport infrastructure. The proposed infrastructure is in the vaguest and earliest stages of consultation and the chosen changes to infrastructure must be phased in with building, so it makes no sense to bring development on these sites forward early.

Change To Plan:

Legally Compliant?: Not Specified

Full Reference: O - 65771 - 22509 - PM/SC/3/I - i, ii, iii

## 65814 Object

**Respondent: Hardwick Parish Council (Mrs G Stoehr) [1891]**

**Agent: N/A**

Summary: The consideration of reasonable alternatives is not rigorous and is based on mainly qualitative information. A more in-depth and quantitative appraisal of the two options (new settlements vs edge of city sites) should have been undertaken.

The appraisal of sites is too general and specific 'edge of city sites identified' as the new settlements were (West Cambourne, Bourn Airfield, Waterbeach), that way specific comparisons could be made and identify the 'cost' of protecting the Green Belt e.g.

\*number of trips and type,

\*vehicular carbon emissions,

\*cost of providing service and access to services,

cost of additional transport and infrastructure.

No explanation as to why the councils deviate from the subregional development strategy.

No discussion has been had as to whether the Development Strategy review should be updated to better align the councils' policies and practices.

Paragraphs 13 to 16 and 29 to 31 of supporting document.

Change To Plan: Amend modification. Reasons identified above.

Legally Compliant?: Not Specified

Full Reference: O - 65814 - 1891 - PM/SC/3/I - i, iii

## 65817 Object

**Respondent: Caxton Parish Council (Mrs Gail Stoehr) [1153]**

**Agent: N/A**

Summary: The consideration of reasonable alternatives is not rigorous and is based on mainly qualitative information. A more in-depth and quantitative appraisal of the two options (new settlements vs edge of city sites) should have been undertaken.

The appraisal of sites is too general and specific 'edge of city sites identified' as the new settlements were (West Cambourne, Bourn Airfield, Waterbeach), that way specific comparisons could be made and identify the 'cost' of protecting the Green Belt e.g.

\*number of trips and type,

\*vehicular carbon emissions,

\*cost of providing service and access to services,

cost of additional transport and infrastructure.

No explanation as to why the councils deviate from the subregional development strategy.

No discussion has been had as to whether the Development Strategy review should be updated to better align the councils' policies and practices.

Paragraphs 13 to 16 and 29 to 31 of supporting document.

Change To Plan: Amend modification. Reasons identified above.

Legally Compliant?: Not Specified

Full Reference: O - 65817 - 1153 - PM/SC/3/I - i, iii

## 65829 Object

**Respondent: Mrs Janice Burrell [3289]**

**Agent: N/A**

Summary: The worst effects of the Bourn Airfield Development and West Cambourne are due to poor transport infrastructure. The proposed infrastructure is in the vaguest and earliest stages of consultation and the chosen changes to infrastructure must be phased in with building, so it makes no sense to bring development on these sites forward early.

Change To Plan:

Legally Compliant?: Not Specified

Full Reference: O - 65829 - 3289 - PM/SC/3/I - None

## 65941 Object

**Respondent: Cambridge Past Present and Future (Ms Stacey Weiser) [20942]**

**Agent: N/A**

Summary: Concerns about sustainability of new village at Bourn Airfield. 3,500 homes does not achieve size and scale to generate a reasonable degree of self-sufficiency in terms of new employment, retail or recreational facilities. Will be dependent on Cambridge. Could degenerate into dormitory. Will compete with Cambourne. Housing might be best re-located to Cambourne so it becomes more self-sufficient.

Accept need for 3,500 homes but propose they are allocated to a Greater Cambourne Area Action Plan, drawn more widely than our Airfield AAP to include whole of Cambourne, including West Cambourne, Bourn Airfield, and proposed Harbourn area to north of A428. Enlarged AAP will enable more detailed study to be undertaken of most sustainable form of development in this area.

Change To Plan: Amend modification

Legally Compliant?: Not Specified

Full Reference: O - 65941 - 20942 - PM/SC/3/I - ii

## 66208 Object

**Respondent: MCA Developments Limited [3652]**

**Agent: Barton Willmore (Mr Steven Kosky) [3212]**

Summary: Bringing forward phasing of Bourn Airfield so significantly, will force both sites to compete for same market share within same timeframe. Market capacity has its own level and most likely outcome will be reduction in anticipated delivery rates of both sites, with no net gains to overall housing trajectory.

Bourn Airfield will directly compete with existing Cambourne for inward investment and other resources at critical time in Cambourne's development, as established new settlement looks to reach more sustainable critical mass.

Advocate phasing of Bourn Airfield left unchanged, so if Inspector finds in favour of this allocation, it will come on line later in Plan Period, when likely to be most needed and where it will not be prejudicial to successful completion of Cambourne

Change To Plan: Amend modification

Legally Compliant?: Not Specified

Full Reference: O - 66208 - 3652 - PM/SC/3/I - i, iii, iv

## 66217 Object

**Respondent: North Barton Road Land Owners Group [21302]**

**Agent: Carter Jonas LLP (Brian Flynn) [17331]**

Summary: Policy S/6 - object to Criteria f. Bourn Airfield.  
Uncertain delivery of housing and infrastructure at Bourn Airfield.  
New settlements do not deliver policy compliant levels of affordable housing, and we anticipate that a similar outcome would occur at Bourn Airfield.

Relevant attachments:

-Jan Representations OAN (25.01.16).pdf

-North BRLOG LP Mods Jan 2016.pdf : Paragraphs 69 to 76.pdf

Change To Plan: We request that the proposed new settlement at Bourn Airfield is deleted.

Legally Compliant?: Not Specified

Full Reference: O - 66217 - 21302 - PM/SC/3/I - i, ii, iv

## 65592 Support

**Respondent: Anglian Water Services Limited (Sue Bull) [15648]**

**Agent: N/A**

Summary: 2.43 - Providing necessary infrastructure is in place to serve the proposed development Anglian Water would have no issue with the flexibility in the start date of delivery of new settlements.

Change To Plan:

Legally Compliant?: Not Specified

Full Reference: S - 65592 - 15648 - PM/SC/3/I - None



## 65714 Support

**Respondent:** The Taylor Family & Countryside Properties (UK) Ltd [19841]

**Agent:** Andrew Martin - Planning Limited (Mr Andrew Martin) [16509]

**Summary:** We support the deletion of point 4 that refers to the phasing and first housing completions.

**Change To Plan:**

**Legally Compliant?:** Not Specified

**Full Reference:** S - 65714 - 19841 - PM/SC/3/I - None

## 65790 Support

**Respondent:** Historic England (Mr David Grech) [23622]

**Agent:** N/A

**Summary:** In respect of Housing Land Supply, Historic England has reviewed the revised housing allocation map (Figure 3.2) prepared by the Councils and again we do not wish to comment in detail on either the New Proposal site in the City or the New Proposal Site in SCDC.

Nor do we object to the main modifications proposed to the South Cambridgeshire Local Plan in respect of the Development Strategy as set out in paragraphs 2.42, 2.43, 2.44, 2.45 and 2.47. We positively support the main modification proposed to the South Cambridgeshire Local Plan in respect of the Development Strategy as set out in paragraph 2.46.

**Change To Plan:**

**Legally Compliant?:** Not Specified

**Full Reference:** S - 65790 - 23622 - PM/SC/3/I - None

**CHAPTER:** Appendix C: Proposed main PM/SC/4/A  
modifications to the Submission

## 66064 Object

**Respondent:** South Cambridgeshire Green Party (Miss Eleanor Crane) [25357]

**Agent:** N/A

**Summary:** Aware of changes to national government policy with respect to energy and water efficient homes. Nevertheless, climate change remains biggest threat facing our population and reducing greenhouse gas emissions from our communities is vital. East Anglia already classified as an area of severe water stress (source: Anglian Water), which will only become more severe as climate changes (and population grows). More efficient homes mean less energy poverty and better quality of life for South Cambridgeshire residents. Urge the Council to require energy efficiency standards above and beyond national minimum, aiming for zero carbon dwellings (Paragraphs 4.12, 4.19), and require most stringent standards of water efficiency possible on all developments (Policy CC/4 Section 1).

**Change To Plan:**

**Legally Compliant?:** Not Specified

**Full Reference:** O - 66064 - 25357 - PM/SC/4/A - None

## 65959 Support

**Respondent:** Bloor Homes Eastern [16420]

**Agent:** Pegasus Planning Group (Nicky Parsons) [15818]

**Summary:** Modifications PM/SC/4/A, PM/SC/4/E and PM/SC/4/F reflect the withdrawal of the Code for Sustainable Homes and the subsequent introduction of national Housing Technical Standards. This approach is welcomed as Bloor Homes (Eastern) consider that these should be addressed through building regulations rather than planning policies. However, the use of nationally-defined optional technical standards in South Cambridgeshire relating to water conservation, put into effect through planning policy, is accepted.

**Change To Plan:**

**Legally Compliant?:** Not Specified

**Full Reference:** S - 65959 - 16420 - PM/SC/4/A - None

**65330 Object**      **Respondent: Gamlingay Community Turbine (Mike Brettle) [16468]**      **Agent: N/A**

Summary: The requirement for planning permission for wind turbines to only be granted if in an area previously identified as suitable in a local or neighbourhood plan needs to be elaborated. It cannot be applied to smaller villages that may not have such a plan nor is it practical for the whole of South Cambs to be analysed in detail. If applied literally the modification would, for example, have prevented the construction of the highly successful and beneficial Gamlingay community turbine

Change To Plan: Clarification should be added along the following lines: -  
"permission for wind turbines shall be limited to areas identified in a local or neighbourhood plan if such a plan exists and has considered suitability of areas for wind turbines. If areas are deemed unsuitable in any such plan there must be concrete and supportable reasons. If there is no relevant plan then planning decisions will be made as though the area is suitable subject to normal planning requirements".

and

"For the purposes of this plan it is noted that South Cambridgeshire is suitable for wind turbine developments subject to planning requirements regarding environmental impacts and other considerations at each particular site"

and

"in view of rapid progress in wind energy technology only exceptional circumstances can justify defining an area as unsuitable for wind energy development over the lifetime of this plan".

Legally Compliant?: Yes

Full Reference: O - 65330 - 16468 - PM/SC/4/B - i, ii

**66067 Object**      **Respondent: South Cambridgeshire Green Party (Miss Eleanor Crane) [25357]**      **Agent: N/A**

Summary: We also note with regret the changes to national policy on wind turbines and would urge the Council to do all they can to approve applications for appropriate and sustainable wind turbines within the constraints of national policy (Policy CC/2 criteria 1, 2).

Change To Plan:

Legally Compliant?: Not Specified

Full Reference: O - 66067 - 25357 - PM/SC/4/B - None

**65799 Support**      **Respondent: Historic England (Mr David Grech) [23622]**      **Agent: N/A**

Summary: Aside from this, we do not object to the other main modifications proposed to the Cambridge Local Plan in respect of Written Ministerial Statements as set out in paragraph 2.55, nor do we object to the main modifications proposed to the South Cambridgeshire Local Plan in respect of the Written Ministerial Statements as set out in paragraph 2.56, 2.67 and 2.58 of the Joint Consultation Report.

Change To Plan:

Legally Compliant?: Not Specified

Full Reference: S - 65799 - 23622 - PM/SC/4/B - None

**65161 Object**                      **Respondent:** Flecks Lane Action Group (FLAG) (Mr Brian Bell) [25251]                      **Agent:**    N/A

Summary: We (FLAG) support the fact that a modification is necessary to make the plan(s) sound and/or legally compliant but we believe PM/SC/4/C must be strengthened to read as attached PM-SC-4-C-Table.pdf, 2/ FLAG, to comply fully with National policy.

Change To Plan: Revise PM-SC-4-C as amended in the attached PM-SC-4-C-Table.pdf, 2/ FLAG.

Legally Compliant?: No

Full Reference: O - 65161 - 25251 - PM/SC/4/C - iv

**65164 Object**                      **Respondent:** Mrs Annie Coe [25252]                      **Agent:**    N/A

Summary: I do not think that the present wording gives sufficient protection to the best quality agricultural land. The Ministerial Written Statement of 25 March 2015 specifically says that 'the most compelling evidence' would be needed to use such land.

Clause 1 d. should also be strengthened to ensure that developers can demonstrate they have the support of the local community and local authority.

Change To Plan: Clause 1a. (PM/SC/4/C) should be strengthened so that any proposal for a solar farm involving the best and most versatile (BMV) agricultural land would need to be justified by the most compelling evidence.

Clause 1 d. should be amended to ensure that developers can demonstrate they have the full support of the local community and local authority.

Legally Compliant?: No

Full Reference: O - 65164 - 25252 - PM/SC/4/C - iv

**65183 Object**                      **Respondent:** Mrs Emma Birkwood [25292]                      **Agent:**    Mrs Emma Birkwood [25292]

Summary: The current wording doesn't give adequate protection to our countries need to be self sufficient in its provision of food to the nation (with all the environmental impacts of importing food, aside from the strategic rational for growing our own). Good agricultural land should not be used for alternative uses when we are not self sufficient. It doesn't help the environment when used as such - even for solar.

Change To Plan: Clause PM/SC/4/C should include wording to protect our existing agricultural land to ensure it is used for farming, where it is being used as such and can be used for such purpose.

Legally Compliant?: No

Full Reference: O - 65183 - 25292 - PM/SC/4/C - i, ii, iv

**65184 Object**                      **Respondent:** mrs christine austin [25293]                      **Agent:**    N/A

Summary: I do not think the present wording of the clause gives sufficient protection to high quality agricultural land.

Change To Plan: Clause PM/CS/4/C should be strengthened so that any proposal for a solar farm involving the best and most versatile agricultural land would need to be justified by the most compelling evidence.

Legally Compliant?: No

Full Reference: O - 65184 - 25293 - PM/SC/4/C - iv

**65208 Object**                      **Respondent:** Mrs Rose Dickinson [25298]                      **Agent:**    N/A

Summary: i do not think that the present wording of the clause gives sufficient protection to high quality agricultural land. With our increasing population we will need as much good quality land to supply our food needs.

Change To Plan: Clause PM/SC/4/C should be strengthened so that any proposal for a solar farm involving the best and most versatile agricultural land would need to be justified by the most compelling evidence.

Legally Compliant?: No

Full Reference: O - 65208 - 25298 - PM/SC/4/C - iv

## 65230 Object

**Respondent: Mr Peter Allen [25300]**

**Agent: N/A**

Summary: I think the present wording should be clarified to use the term "Best and most versatile agricultural land" as I understand that this has specific meaning in planning terms. Also clause d should be amended so that developers have to demonstrate that they have the support of the local community.

Change To Plan: Clause PM/SC/4/C should be strengthened and clarified to read "Any proposal for a solar farm involving the best and most versatile agricultural land would need to be justified by the most compelling evidence."

Legally Compliant?: No

Full Reference: O - 65230 - 25300 - PM/SC/4/C - iv

## 65233 Object

**Respondent: Kate Ware [25301]**

**Agent: N/A**

Summary: I do not think the current wording of the clause gives sufficient protection to high quality agricultural land

Change To Plan: Clause PM/SC/4/C should be strengthened so that any proposal for a solar farm on best and most versatile land would need to be justified by the most compelling evidence.

Clause d should be amended to ensure that developers demonstrate that they have the support of the local community

Legally Compliant?: No

Full Reference: O - 65233 - 25301 - PM/SC/4/C - iv

## 65235 Object

**Respondent: George Carr [25302]**

**Agent: N/A**

Summary: I do not think the present wording of the clause gives sufficient protection to high quality agricultural land or near by villages

Change To Plan: Clause PM/SC/4/C should be strengthened so that any proposal for a solar farm involving the best and most versatile agricultural land would need to be justified by the most compelling evidence but agreed with the local community

Legally Compliant?: No

Full Reference: O - 65235 - 25302 - PM/SC/4/C - ii, iv

## 65242 Object

**Respondent: John Brocklehurst [25023]**

**Agent: N/A**

Summary: The proposed wording does not give sufficient protection to agricultural land.

Change To Plan: Clause PM/SC/4/C should be strengthened so that the proposers of any solar farm development on best and most versatile agricultural land would have to provide compelling evidence and show that they had the support of the local community.

Legally Compliant?: No

Full Reference: O - 65242 - 25023 - PM/SC/4/C - iv

## 65250 Object

**Respondent: Mr Keith Austin [25323]**

**Agent: N/A**

Summary: I do not think the present wording of the clause gives sufficient protection to high quality agricultural land

Change To Plan: Clause PM/SC/4/C should be strengthened so that any proposal for a solar farm involving the best and most versatile agricultural land would need to be justified by the most compelling evidence

Legally Compliant?: No

Full Reference: O - 65250 - 25323 - PM/SC/4/C - iv

## 65251 Object

**Respondent: Mr Barry Stuart [25324]**

**Agent: N/A**

Summary: Whilst I agree that the plan needs to be modified to make it sound I do not think the present wording of the clause gives sufficient protection to high quality agricultural land.

Change To Plan: Clause PM/SC/4/C should be strengthened so that any proposal for a solar farm involving the best and most versatile agricultural land would need to be justified by the most compelling evidence'.

Legally Compliant?: Yes

Full Reference: O - 65251 - 25324 - PM/SC/4/C - ii

## 65258 Object

**Respondent: Dr C Grant [22459]**

**Agent: N/A**

Summary: This proviso that good agricultural land should not be developed is appropriate but the current Waterbeach new town plan includes areas of good agricultural land in conflict with this policy.

Change To Plan: Development areas should be reassessed to ensure agricultural land is not included.

Legally Compliant?: Yes

Full Reference: O - 65258 - 22459 - PM/SC/4/C - iii

## 65259 Object

**Respondent: Mr John Norman [25325]**

**Agent: N/A**

Summary: I do not think the present wording of the clause gives sufficient protection to high quality agricultural land.

Clause d. should be amended to ensure that developers demonstrate they have the support of the local community.

Change To Plan: Clause PM/SC/4/C should be strengthened so that any proposal for a solar farm involving the best and most versatile agricultural land would need to be justified by the most compelling evidence.

Legally Compliant?: No

Full Reference: O - 65259 - 25325 - PM/SC/4/C - iv

## 65260 Object

**Respondent: Mrs Anne Norman [25326]**

**Agent: N/A**

Summary: I do not think the present wording of the clause gives sufficient protection to high quality agricultural land.

Clause d. should be amended to ensure that developers demonstrate they have the support of the local community.

Change To Plan: Clause PM/SC/4/C should be strengthened so that any proposal for a solar farm involving the best and most versatile agricultural land would need to be justified by the most compelling evidence.

Legally Compliant?: No

Full Reference: O - 65260 - 25326 - PM/SC/4/C - iv

## 65273 Object

**Respondent: Flecks Lane Action Group (FLAG) (Mr Brian Bell) [25251]**

**Agent: N/A**

Summary: We (FLAG) support the fact that a modification is necessary to make the plan(s) sound and/or legally compliant but we believe PM/SC/4/C must be strengthened to read as attached PM-SC-4-C-Table2.pdf, 2/ FLAG, to comply fully with National policy, and at the same time (without prejudice to the above) we wish to strengthen CC/2/1.d as in Table 4.pdf, 4/FLAG (for which no amendment is proposed by SCDC).

Change To Plan: Revise PM/SC/4/C as amended in the attached PM-SC-4-C-Table2.pdf, 2/FLAG; and (without prejudice to the above) add a new amendment proposal as in the attached PM-SC-4-C-Table4.pdf, 4/FLAG.

Legally Compliant?: No

Full Reference: O - 65273 - 25251 - PM/SC/4/C - iv

## 65281 Object

**Respondent: Gordon Hill [25331]**

**Agent: N/A**

Summary: The present wording of the clause does not give sufficient protection to "high quality agricultural land".

Change To Plan: Clause PM/SC/4/C should be considerably strengthened so that any proposal for e.g. a solar farm involving the "best and most versatile agricultural land" would need to be justified by the most compelling and powerful evidence. Clause d. should be amended to ensure that developers positively demonstrate they have the full support of the local community

Legally Compliant?: No

Full Reference: O - 65281 - 25331 - PM/SC/4/C - iv

## 65365 Object

**Respondent: Mr Anthony Coe [25261]**

**Agent: N/A**

Summary: The present amended wording does not give sufficient protection to high quality agricultural land, as required by national policy, highlighted in the Ministerial Written Statement of 25 March 2015.

Also, Clause 1 d. should in my opinion additionally require that developers can demonstrate that they have obtained the support of the local community.

Change To Plan: 1) Clause PM/SC/4/C should be strengthened so that any proposal for a solar farm involving the best and most versatile agricultural land would need to be justified by the most compelling evidence.

2) Policy CC/2 Clause 1 d. should be amended to read: Developers (INSERT can demonstrate they) have engaged effectively with the local community and local authority (INSERT and obtained their support).

Legally Compliant?: No

Full Reference: O - 65365 - 25261 - PM/SC/4/C - iv

## 65423 Object

**Respondent: Mr Adrian Pickett [25360]**

**Agent: N/A**

Summary: The clause should be strengthened to give better protection to high quality agricultural land being retained for food production

Change To Plan: Clause PM/SC/4/C should be strengthened by requiring that a proposal for a solar farm on good agricultural land must be justified by very strong evidence.

Legally Compliant?: No

Full Reference: O - 65423 - 25360 - PM/SC/4/C - iv

## 65464 Object

**Respondent: Mrs Leisha Kirkpatrick [25369]**

**Agent: N/A**

Summary: The present wording to the clause does not protect high quality agricultural land and needs to be strengthened to ensure it is unambiguous in its interpretation.

Clause d should be amended to ensure that developers demonstrate they have support of the local community. Consultation meetings do not equate to local support.

Change To Plan: Clause PM/SC/4/C should be strengthened so that any proposal for a solar farm involving the best and most versatile agricultural land would need to be justified by the most compelling evidence and certainly take into account surrounding solar farm developments (proposed and actual) both within and bordering SCDC.

Legally Compliant?: No

Full Reference: O - 65464 - 25369 - PM/SC/4/C - iv

## 65465 Object

**Respondent: Mrs Jennifer Bell [25370]**

**Agent: N/A**

Summary: While I support the revised wording of Clause PM/SC/4/C, I believe it requires to be strengthened in accordance with the Written Ministerial Statement of 25 March 2015, by the addition after "high quality agricultural" of the words "(used only if shown to be necessary, and, from solar farms on best and most versatile land, only if justified by the most compelling evidence)". I further believe, without prejudice to the above, in CC/2 1.d, that the clause requires to added at the end the words "and demonstrated the support of the local community".

Change To Plan: Add in CC/2 1.a, after "high quality agricultural land", the words "(used only if shown to be necessary, and, from solar farms on best and most versatile land, only if justified by the most compelling evidence)". Without prejudice to the above, add, to the end of CC/2 1.d, the words "and demonstrated the support of the local community".

Legally Compliant?: No

Full Reference: O - 65465 - 25370 - PM/SC/4/C - None

## 65473 Object

**Respondent: Flecks Lane Action Group (FLAG) (Mr Brian Bell) [25251]**

**Agent: N/A**

Summary: While I support the revised wording of Clause PM/SC/4/C, I believe it must be strengthened in accordance with the Written Ministerial Statement of 25 March 2015, by the addition (after "high quality agricultural land") of the words "(used only if shown to be necessary, and, from solar farms on best and most versatile land, only if justified by the most compelling evidence)". I further believe, without prejudice to the above, in CC/2 1.d, that the clause requires to added at the end the words "and demonstrated the support of the local community".

Change To Plan: Add in CC/2 1.a, after "high quality agricultural land", the words "(used only if shown to be necessary, and, from solar farms on best and most versatile land, only if justified by the most compelling evidence)". Without prejudice to the above, add, to the end of CC/2 1.d, the words "and demonstrated the support of the local community".

Legally Compliant?: No

Full Reference: O - 65473 - 25251 - PM/SC/4/C - None

## 65482 Object

**Respondent: Mr Philip Dickinson [25372]**

**Agent: N/A**

Summary: I do not think that the present wording of the clause gives sufficient protection to high quality agricultural land.

Change To Plan: Clause PM/SC/4/C should be strengthened so that any proposal for a solar farm involving the best and most versatile agricultural land would need to be justified by the most compelling evidence.

Legally Compliant?: No

Full Reference: O - 65482 - 25372 - PM/SC/4/C - iv

## 65949 Object

**Respondent: Heidi Allen MP [24704]**

**Agent: N/A**

Summary: The proposed minor modifications in relation to solar farms are not robust enough to ensure that the plan is consistent with changes to national planning policy and provide adequate protection to the character and distinctiveness of the local landscape.

The WMS 25 March recognised that some local communities have genuine concerns that when it comes to solar farms insufficient weight has been given to these protections and the benefits of high quality agricultural land. It would also seem prudent to amend the wording in line with national planning principles which states support for solar PV should ensure proposals are appropriately sited by ensuring local communities' views are able to influence decisions that affect them.

Change To Plan: To ensure Policy CC/2 reflects current national planning policy and guidance I suggest the following amendments to that currently proposed:  
a. The development, either individually or cumulatively with other developments, does not have unacceptable adverse impacts on heritage assets (including their settings), natural assets, high quality agricultural land (any proposal for a solar farm involving the best and most versatile agricultural land is justified by the most compelling evidence), the landscape, or the amenity of nearby residents (visual impact, noise, shadow flicker, odour, fumes, traffic);  
d. Developers have engaged effectively with the local community and local authority and can demonstrate local community support for the proposed development.

Legally Compliant?: Not Specified

Full Reference: O - 65949 - 24704 - PM/SC/4/C - None

## 66069 Object

**Respondent: South Cambridgeshire Green Party (Miss Eleanor Crane) [25357]**

**Agent: N/A**

Summary: We also note with regret the changes to national policy on wind turbines and would urge the Council to do all they can to approve applications for appropriate and sustainable wind turbines within the constraints of national policy (Policy CC/2 criteria 1, 2).

Change To Plan:

Legally Compliant?: Not Specified

Full Reference: O - 66069 - 25357 - PM/SC/4/C - None

## 65127 Support

**Respondent: Dr Roger Sewell [25099]**

**Agent: N/A**

Summary: Agricultural land is a critically important ingredient of the countryside.

Change To Plan:

Legally Compliant?: Not Specified

Full Reference: S - 65127 - 25099 - PM/SC/4/C - None

## 65240 Support

**Respondent: Mr Richard Truscott [25307]**

**Agent: N/A**

Summary: Good quality agricultural land must be used for food production only. This gives sustainable food supplies and decreases dependency on imports and can reduce food miles. Brown field sites, poor agricultural land and roofs are suitable places for Solar PV sites.

Change To Plan:

Legally Compliant?: Not Specified

Full Reference: S - 65240 - 25307 - PM/SC/4/C - None

**65248 Support**                      **Respondent: Mr Keith Austin [25323]**                      **Agent: N/A**

Summary: I do not think the present wording of the clause gives sufficient protection to high quality agricultural land

Change To Plan:

Legally Compliant?: Not Specified

Full Reference: S - 65248 - 25323 - PM/SC/4/C - None

**65800 Support**                      **Respondent: Historic England (Mr David Grech) [23622]**                      **Agent: N/A**

Summary: Aside from this, we do not object to the other main modifications proposed to the Cambridge Local Plan in respect of Written Ministerial Statements as set out in paragraph 2.55, nor do we object to the main modifications proposed to the South Cambridgeshire Local Plan in respect of the Written Ministerial Statements as set out in paragraph 2.56, 2.67 and 2.58 of the Joint Consultation Report.

Change To Plan:

Legally Compliant?: Not Specified

Full Reference: S - 65800 - 23622 - PM/SC/4/C - None

**65965 Support**                      **Respondent: Natural England (Ms Gail Hopkins) [25046]**                      **Agent: N/A**

Summary: We support the proposed amendment to ensure that development does not have an unacceptable adverse impact on high quality agricultural land.

Change To Plan:

Legally Compliant?: Not Specified

Full Reference: S - 65965 - 25046 - PM/SC/4/C - None



### 65140 Object

**Respondent: RES Group (UK and Ireland) (Dr Sarah Randall) [25206]**

**Agent: N/A**

Summary: Plan is unsound due to deferral of allocating areas suitable for onshore wind to Neighbourhood Plans, this will effectively impose a moratorium against all wind energy development. This approach is not a proactive or positive strategy to promote energy generation from renewable sources. It would be quick to produce a map of suitable areas for onshore wind (we have provided a broad areas map) and RES would be happy to help through provision of data or advice.

Change To Plan: RES strongly recommend that the Local Plan is modified to provide a map of areas suitable for onshore wind and the policy reworded accordingly.

Legally Compliant?: No

Full Reference: O - 65140 - 25206 - PM/SC/4/D - i, ii, iii, iv

### 65282 Object

**Respondent: Bridget Smith [17462]**

**Agent: N/A**

Summary: This is a discriminatory proposal which limits the choices of small communities. It is contrary to the desired outcomes of Localism.

Change To Plan: Community Wind Power schemes to be excluded where they deliver clear financial benefits or other initiatives which strengthen communities.

Legally Compliant?: Yes

Full Reference: O - 65282 - 17462 - PM/SC/4/D - i, ii

### 65331 Object

**Respondent: Gamlingay Community Turbine (Mike Brettle) [16468]**

**Agent: N/A**

Summary: Noted that for much of South Cambs neighbourhood plans do not exist or have not been prepared with the resources required for a thorough analysis of suitability for wind turbine developments the rigid interpretation of the section as written would prevent wind turbine developments by default, including projects like the Gamlingay Community turbine.

Change To Plan: I would like e) to be modified as follows: -

"the development site is in an area identified as suitable for wind energy development in a Neighbourhood Plan, or in an area which has not been considered and deemed unsuitable for valid and justifiable reasons; and....."

Legally Compliant?: Yes

Full Reference: O - 65331 - 16468 - PM/SC/4/D - i, ii

### 66068 Object

**Respondent: South Cambridgeshire Green Party (Miss Eleanor Crane) [25357]**

**Agent: N/A**

Summary: We also note with regret the changes to national policy on wind turbines and would urge the Council to do all they can to approve applications for appropriate and sustainable wind turbines within the constraints of national policy (Policy CC/2 criteria 1, 2).

Change To Plan:

Legally Compliant?: Not Specified

Full Reference: O - 66068 - 25357 - PM/SC/4/D - None

### 65801 Support

**Respondent: Historic England (Mr David Grech) [23622]**

**Agent: N/A**

Summary: Aside from this, we do not object to the other main modifications proposed to the Cambridge Local Plan in respect of Written Ministerial Statements as set out in paragraph 2.55, nor do we object to the main modifications proposed to the South Cambridgeshire Local Plan in respect of the Written Ministerial Statements as set out in paragraph 2.56, 2.67 and 2.58 of the Joint Consultation Report.

Change To Plan:

Legally Compliant?: Not Specified

Full Reference: S - 65801 - 23622 - PM/SC/4/D - None

**65709 Object**                      **Respondent: Dr Robert Evans [25285]**                      **Agent: N/A**

Summary: The modifications do not address the availability of water.

Have the Inspectors accepted the original Sustainability Appraisal (paragraph 6.4.9), or have the Inspectors just ignored it? Whatever, the Draft Local Plan should address the problem of water availability.

Based on my own crude estimates there is a good chance Cambridge Water Company does not have enough water in the chalk aquifer to safely and sustainably maintain the proposed growth of Cambridge and its environs.

In Table 4.1 Areas to be covered in the Sustainability Statement, under the Aim/Objective of Water Management the word "severe" has been deleted. A downplaying of what could be a serious problem.

The Government is not helping the District Councils by lowering standards of building and so making water efficiency less important than it was as it is one way of tackling the water availability problem.

Change To Plan:  
Legally Compliant?: Not Specified

Full Reference: O - 65709 - 25285 - PM/SC/4/E - None

**65716 Object**                      **Respondent: The Taylor Family & Countryside Properties (UK) Ltd [19841]**                      **Agent: Andrew Martin - Planning Limited (Mr Andrew Martin) [16509]**

Summary: Broadly support the Councils proposed amendments to Policy CC/4 and the setting of the water efficiency standard of 110 litres per person per day as set out in the Building Regulations.

It is our experience however that under certain circumstances this standard is difficult to achieve for certain dwellings and therefore we request that an element of flexibility is built into this policy to allow a holistic approach to internal and external water efficiency to secure policy compliance.

Change To Plan: Amend modification. Add an additional sentence onto the policy as follows: Should this target be unviable then the Council will consider alternative proposals to improve water efficiency within dwellings.

Legally Compliant?: Not Specified

Full Reference: O - 65716 - 19841 - PM/SC/4/E - iii

**66065 Object**                      **Respondent: South Cambridgeshire Green Party (Miss Eleanor Crane) [25357]**                      **Agent: N/A**

Summary: Aware of changes to national government policy with respect to energy and water efficient homes. Nevertheless, climate change remains biggest threat facing our population and reducing greenhouse gas emissions from our communities is vital. East Anglia already classified as an area of severe water stress (source: Anglian Water), which will only become more severe as climate changes (and population grows). More efficient homes mean less energy poverty and better quality of life for South Cambridgeshire residents. Urge the Council to require energy efficiency standards above and beyond national minimum, aiming for zero carbon dwellings (Paragraphs 4.12, 4.19), and require most stringent standards of water efficiency possible on all developments (Policy CC/4 Section 1).

Change To Plan:

Legally Compliant?: Not Specified

Full Reference: O - 66065 - 25357 - PM/SC/4/E - None

## 65802 Support

**Respondent: Historic England (Mr David Grech) [23622]**

**Agent: N/A**

Summary: Aside from this, we do not object to the other main modifications proposed to the Cambridge Local Plan in respect of Written Ministerial Statements as set out in paragraph 2.55, nor do we object to the main modifications proposed to the South Cambridgeshire Local Plan in respect of the Written Ministerial Statements as set out in paragraph 2.56, 2.67 and 2.58 of the Joint Consultation Report.

Change To Plan:

Legally Compliant?: Not Specified

Full Reference: S - 65802 - 23622 - PM/SC/4/E - None

## 65960 Support

**Respondent: Bloor Homes Eastern [16420]**

**Agent: Pegasus Planning Group (Nicky Parsons) [15818]**

Summary: Modifications PM/SC/4/A, PM/SC/4/E and PM/SC/4/F reflect the withdrawal of the Code for Sustainable Homes and the subsequent introduction of national Housing Technical Standards. This approach is welcomed as Bloor Homes (Eastern) consider that these should be addressed through building regulations rather than planning policies. However, the use of nationally-defined optional technical standards in South Cambridgeshire relating to water conservation, put into effect through planning policy, is accepted.

Change To Plan:

Legally Compliant?: Not Specified

Full Reference: S - 65960 - 16420 - PM/SC/4/E - None

CHAPTER: Appendix C: Proposed main PM/SC/4/F  
modifications to the Submission

## 66066 Object

**Respondent: South Cambridgeshire Green Party (Miss Eleanor Crane) [25357]**

**Agent: N/A**

Summary: Aware of changes to national government policy with respect to energy and water efficient homes. Nevertheless, climate change remains biggest threat facing our population and reducing greenhouse gas emissions from our communities is vital. East Anglia already classified as an area of severe water stress (source: Anglian Water), which will only become more severe as climate changes (and population grows). More efficient homes mean less energy poverty and better quality of life for South Cambridgeshire residents. Urge the Council to require energy efficiency standards above and beyond national minimum, aiming for zero carbon dwellings (Paragraphs 4.12, 4.19), and require most stringent standards of water efficiency possible on all developments (Policy CC/4 Section 1).

Change To Plan:

Legally Compliant?: Not Specified

Full Reference: O - 66066 - 25357 - PM/SC/4/F - None

## 65779 Support

**Respondent: The Taylor Family & Countryside Properties (UK) Ltd [19841]**

**Agent: Andrew Martin - Planning Limited (Mr Andrew Martin) [16509]**

Summary: Countryside Properties support the Council's proposed amendments to use the Building Regulations as the only mechanisms to set energy efficiency standards in new homes.

Change To Plan:

Legally Compliant?: Not Specified

Full Reference: S - 65779 - 19841 - PM/SC/4/F - None

## 65961 Support

**Respondent: Bloor Homes Eastern [16420]**

**Agent: Pegasus Planning Group (Nicky Parsons) [15818]**

Summary: Modifications PM/SC/4/A, PM/SC/4/E and PM/SC/4/F reflect the withdrawal of the Code for Sustainable Homes and the subsequent introduction of national Housing Technical Standards. This approach is welcomed as Bloor Homes (Eastern) consider that these should be addressed through building regulations rather than planning policies. However, the use of nationally-defined optional technical standards in South Cambridgeshire relating to water conservation, put into effect through planning policy, is accepted.

Change To Plan:

Legally Compliant?: Not Specified

Full Reference: S - 65961 - 16420 - PM/SC/4/F - None

**65797 Support**      **Respondent: The Taylor Family & Countryside Properties (UK) Ltd [19841]**      **Agent: Andrew Martin - Planning Limited (Mr Andrew Martin) [16509]**

Summary: In principle, we acknowledge the change in policy and design guidance for surface water drainage schemes and can confirm that the proposed Bourn Airfield SuDS scheme will be developed in accordance with this modified policy. We will also take into account the other latest technical guidance available from the recently published CIRIA SuDS Manual.

The final Cambridgeshire Flood and Water SPD will need reviewing when available to confirm any key issues.

Change To Plan:

Legally Compliant?: Not Specified

Full Reference: S - 65797 - 19841 - PM/SC/4/G - None

**65980 Support**      **Respondent: Hallmark Hotels (Bar Hill) Ltd [25472]**      **Agent: CgMs (Matthew Roe) [25471]**

Summary: We support the proposed main modification number CC/8: 'Sustainable Drainage Systems'.

We welcome the aligning of local and national policy in this regard and would promote a modification which ensured policy was consistent across spatial scales. Thus we support the amendment to SUDs policy in the proposed modification to the local plan. Furthermore, the development works at our site have been designed with this policy in mind and SUDs have comprised a detailed part of our proposals.

Change To Plan:

Legally Compliant?: Not Specified

Full Reference: S - 65980 - 25472 - PM/SC/4/G - None

**65806 Support**      **Respondent: The Taylor Family & Countryside Properties (UK) Ltd [19841]**      **Agent: Andrew Martin - Planning Limited (Mr Andrew Martin) [16509]**

Summary: We acknowledge and agree that SuDS should be provided in new developments when this is considered necessary. As part of our sustainable approach to water management, aspiration to reduce flood risk, and enhance water quality and environmental benefits at Bourn Airfield, SuDS will be extensively used where possible. The preparation of the surface water strategy for Bourn Airfield has been undertaken in parallel with the masterplanning process whilst taking account of all opportunities and constraints, including heritage and wildlife assets, by closely consulting all the relevant parties in the design team and key stakeholders.

Change To Plan:

Legally Compliant?: Not Specified

Full Reference: S - 65806 - 19841 - PM/SC/4/H - None

**65966 Support**      **Respondent: Natural England (Ms Gail Hopkins) [25046]**      **Agent: N/A**

Summary: Amendments to ensure that Sustainable Drainage Systems (SUDS) take account of wildlife assets is supported.

Change To Plan:

Legally Compliant?: Not Specified

Full Reference: S - 65966 - 25046 - PM/SC/4/H - None

**65807 Support**      **Respondent: The Taylor Family & Countryside Properties (UK) Ltd [19841]**      **Agent: Andrew Martin - Planning Limited (Mr Andrew Martin) [16509]**

Summary: We acknowledge that the Cambridgeshire Flood and Water SPD provides detailed guidance for SuDS and can confirm that this document along with the CIRIA SuDS Manual has been used in order to develop an effective SuDS system for Bourn Airfield development which will satisfy the above criteria.

Change To Plan:

Legally Compliant?: Not Specified

Full Reference: S - 65807 - 19841 - PM/SC/4/I - None

**65967 Support**      **Respondent: Natural England (Ms Gail Hopkins) [25046]**      **Agent: N/A**

Summary: Amendments to ensure that SUDS contribute biodiversity enhancements is supported.

Change To Plan:

Legally Compliant?: Not Specified

Full Reference: S - 65967 - 25046 - PM/SC/4/I - None

**65165 Object**                      **Respondent: Ms Gloria Fletcher [25267]**                      **Agent: N/A**

Summary: H/1: k Land at Bancroft Farm, Church Lane, Little Abington

Would like the modification to be deleted.

Comments - Objection due to the following reasons:  
1) The new proposal impinges on a protected area - The Meadow.  
2) Executive housing was not the original intention.  
3) No allowance for affordable housing for younger people.  
4) Only 1 bungalow in the overall plan - insufficient for those wanting to 'downsize' in Little Abington.  
5) An increase in the number of houses to be built (3 more).

Change To Plan: Delete modification

Legally Compliant?: No

Full Reference: O - 65165 - 25267 - PM/SC/7/A - i, ii

**65247 Object**                      **Respondent: Dr Isobel Smith [25308]**                      **Agent: N/A**

Summary: Full Submission attached.

Main reasons for objections:  
1) Protecting and enhancing landscape character - development is contrary to Policy NH/2.  
2) Biodiversity - development is contrary to Policy NH/4 and affect protected species.  
4) the Parish Councils have proposed 6 houses on the site, but apparently the landowners are pushing for more (9-12 houses). Little Abington is defined as a Group Village under the Local Plan (Policy S/10), which states that residential development and redevelopment up to an indicative maximum scheme size of 8 dwellings will be permitted within Group Villages.  
5) Contrary to Abington Parish Plan which places a high priority on environmental Issues.

Change To Plan: Withdraw the proposed modification for Bancroft Farm H/1:k

Legally Compliant?: No

Full Reference: O - 65247 - 25308 - PM/SC/7/A - ii

**65458 Object**                      **Respondent: Mr G Dash [25368]**                      **Agent: hd planning (Mrs Hayley Doyle) [25367]**

Summary: We believe that this modification doesn't deliver the flexibility to the Local Plan as envisaged in the DEFRA and Government guidance. Although we encourage the allowance of villages to expand to cater for local needs, allowing three sites within the Local Plan at this late stage is a very narrow, inflexible approach towards allowing organic growth in the villages over the plan period.

Change To Plan: We advocate a more criteria based policy approach to sites of this nature to allow other Parish Councils and other sites with local support to come forward through the plan period.

Legally Compliant?: No

Full Reference: O - 65458 - 25368 - PM/SC/7/A - ii, iii, iv

## 65468 Object

**Respondent: Ms S Nutt & Executors of Estate of Mr C Nutt [25362]**

**Agent: Hill Residential (Glyn Mutton) [25361]**

Summary: H/1i: Land at Linton Road, Great Abington

Amendment is sought to better reflect the development potential of the site and national policy - to increase the number of units on the site from 35 to 45 dwellings.

Taking into account the national and local policy it is apparent the current modification proposes an underutilisation of the site, it is proposed that the site would be capable of accommodating around 45 dwellings which would better represent a more efficient use of development land and better reflect the existing densities within the village.

Change To Plan: An amendment to the modification is sought to better reflect the development potential of the site and national policy. The amendment sought would be to increase the number of units the site is deemed to have capacity for (from 35 to 45 dwellings).

Legally Compliant?: Not Specified

Full Reference: O - 65468 - 25362 - PM/SC/7/A - i, iv

## 65471 Object

**Respondent: Ms S Nutt & Executors of Estate of Mr C Nutt [25362]**

**Agent: Hill Residential (Glyn Mutton) [25361]**

Summary: H/1k: Land at Bancroft Farm, Church Lane, Little Abington

Amendment is sought to better reflect the development potential of the site and national policy - to increase the number of units on the site from 6 to 9 dwellings.

Taking into account the national and local policy it is apparent the current modification proposes both an underutilisation of the site and creates significant design challenges that would be in contrast to policy. It is proposed that the site would be capable of accommodating up to nine dwellings which would better represent a more efficient use of development land and better reflect the existing densities within the village.

Change To Plan: An amendment to the modification is sought to better reflect the development potential of the site and national policy. The amendment sought would be to increase the number of units the site is deemed to have capacity for (from 6 to 9 dwellings).

Legally Compliant?: Not Specified

Full Reference: O - 65471 - 25362 - PM/SC/7/A - i, iv

## 65680 Object

**Respondent: Mrs M.C. Taylor [25412]**

**Agent: N/A**

Summary: H/1: k Land at Bancroft Farm, Church Lane, Little Abington

At th consultation meeting on 14 January 2016 in the Abington Institute it was indicated that the developers of the site were proposing more houses on a larger site than in the published draft plan.

I find this unacceptable and it appears to me that the proposed modification to the Local Plan will be used as the basis for increased development, hence my objection.

Change To Plan: Delete the allocation.

Legally Compliant?: Not Specified

Full Reference: O - 65680 - 25412 - PM/SC/7/A - ii

## 65702 Object

**Respondent: Dr Peter Ward [25425]**

**Agent: N/A**

Summary: H/I:k

The small site of Bancroft Farmyard as in a dangerous state. It was cleared and it was proposed to build three (3) dwellings on the site. I agreed with this small development. Since then the number of dwllings has increased greatly and 6, 9 or even 12 have been proposed. This is totally unacceptable and should be reduced to the original proposal of 3 dwellings. I also don't agree to any further encroachment on the meadow.

Change To Plan:

Legally Compliant?: Not Specified

Full Reference: O - 65702 - 25425 - PM/SC/7/A - ii

## 65840 Object

**Respondent: CALA Homes (North Homes Counties) Ltd [25454]**

**Agent: Carter Jonas LLP (Brian Flynn) [17331]**

Summary: We do not object to the parish council-led housing allocations. However, we do question the approach adopted by the Council that allocates land in Group and Infill Villages but other sites at a similar level of the settlement hierarchy were not even considered or assessed for development e.g. land off Highfields Road in Caldecote. The benefits associated with the proposed allocations could equally apply to other sustainable villages e.g. contribute to the housing land supply, meet local housing needs, and support the rural economy and local services and facilities.

In other circumstances potential development sites in Group and Infill Villages have been rejected or not assessed because the development strategy does not anticipate any significant development at this level of the settlement hierarchy, with development site size limits imposed on these villages. This is an inconsistent approach.

Change To Plan:

Legally Compliant?: Not Specified

Full Reference: O - 65840 - 25454 - PM/SC/7/A - None

## 65866 Object

**Respondent: Mr Roger Worboys [3125]**

**Agent: Carter Jonas LLP (Brian Flynn) [17331]**

Summary: We do not object to the parish council-led housing allocations. However, we do question the approach adopted by the Council that allocates land in Group and Infill Villages but other sites at a similar level of the settlement hierarchy were not even considered for development. The benefits associated with the proposed allocations could equally apply to other sustainable villages e.g. contribute to the housing land supply, meet local housing needs, and support the rural economy and local services and facilities.

In other circumstances potential development sites in Group and Infill Villages have been rejected because the development strategy does not anticipate any significant development at this level of the settlement hierarchy, with development site size limits imposed on these villages. This is an inconsistent approach.

Change To Plan:

Legally Compliant?: Not Specified

Full Reference: O - 65866 - 3125 - PM/SC/7/A - None

## 65886 Object

**Respondent: Abington Lea Ltd [25457]**

**Agent: Savills (Mr William Lusty) [3491]**

Summary: Do not consider it is justified for Policy H1 as proposed to be modified, to specifically identify the Abington allocations as being led by Parish Council.

Suggest further modification to policy to include their client's site who owns land on Bourn Rd at Little Abington. Justify inclusion of this site -

1. Need for additional housing in rural communities to support and sustain services.
2. Role Abingtons play in servicing their community - more development than proposed in modification would be beneficial to villages
3. New site assessed for sustainability using Council's criteria

Change To Plan: Modification to Policy H1 should not specifically identify the allocations have been led by Parish Council.

Add their client's site on Bourn Rd , Little Abington as a housing allocation

Legally Compliant?: Not Specified

Full Reference: O - 65886 - 25457 - PM/SC/7/A - ii

## 66058 Object

**Respondent: Laragh Homes [25312]**

**Agent: Strutt & Parker LLP (Mr Jon Jennings) [25077]**

Summary: Swavesey offers an excellent opportunity to deliver more housing in a sustainable location and within the next five years. The village is outside the Green Belt, located on the guided busway with good public transport connecting to St Ives, Cambridge and Northstowe, making it an ideal location for development. Swavesey will therefore benefit from the services and facilities in Northstowe. There are planned improvements to the A14 which will have a positive impact on local traffic conditions. Additionally housing in the village will provide investment in the community, much needed housing and support for existing services and facilities including the guided busway. The site should be allocated for development in Policy H/1.

Change To Plan: Delete & amend modification

Legally Compliant?: Not Specified

Full Reference: O - 66058 - 25312 - PM/SC/7/A - i, ii, iii, iv



|                      |                                                                                                                                                                                                                                                                                                                                                                                                                              |                   |
|----------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------|
| <b>66070 Object</b>  | <b>Respondent: South Cambridgeshire Green Party (Miss Eleanor Crane) [25357]</b>                                                                                                                                                                                                                                                                                                                                             | <b>Agent: N/A</b> |
| Summary:             | Proposed development in the Abingtons:<br>* Any development in the Abingtons must not be linked with road building / widening schemes (A1307).<br>* Any development in the Abingtons must be linked with increased investment in local sustainable transport.<br>* We have concerns about the approach of including specific proposals by certain Parish Councils in the local plan, as this risks creating a fait accompli. |                   |
| Change To Plan:      |                                                                                                                                                                                                                                                                                                                                                                                                                              |                   |
| Legally Compliant?:  | Not Specified                                                                                                                                                                                                                                                                                                                                                                                                                |                   |
| Full Reference:      | O - 66070 - 25357 - PM/SC/7/A - None                                                                                                                                                                                                                                                                                                                                                                                         |                   |
| <b>65167 Support</b> | <b>Respondent: Ms Jean Daunt [25269]</b>                                                                                                                                                                                                                                                                                                                                                                                     | <b>Agent: N/A</b> |
| Summary:             | H/1: k Land at Bancroft Farm, Church Lane, Little Abington                                                                                                                                                                                                                                                                                                                                                                   |                   |
|                      | Support modification for the following reasons:<br>The buildings opposite the houses in Church Lane should be houses.<br>The buildings opposite the bungalows should be bungalows.<br>51a-59 Church Lane - please leave green bushes and trees.                                                                                                                                                                              |                   |
| Change To Plan:      |                                                                                                                                                                                                                                                                                                                                                                                                                              |                   |
| Legally Compliant?:  | Not Specified                                                                                                                                                                                                                                                                                                                                                                                                                |                   |
| Full Reference:      | S - 65167 - 25269 - PM/SC/7/A - None                                                                                                                                                                                                                                                                                                                                                                                         |                   |
| <b>65168 Support</b> | <b>Respondent: Mr &amp; Mrs Barry &amp; Dinah Brooks [25270]</b>                                                                                                                                                                                                                                                                                                                                                             | <b>Agent: N/A</b> |
| Summary:             | H/1: k Land at Bancroft Farm, Church Lane, Little Abington                                                                                                                                                                                                                                                                                                                                                                   |                   |
|                      | Support modification                                                                                                                                                                                                                                                                                                                                                                                                         |                   |
|                      | 9 houses on Church Lane not appropriate.<br>Original 6 fine, but would like to be sure the flint walls remain and the swathes of land and trees remain IN FRONT of new houses opposite bungalows no: 51a-59.<br>TREES are ESSENTIAL for absorbing pollutants from traffic!!!!                                                                                                                                                |                   |
| Change To Plan:      |                                                                                                                                                                                                                                                                                                                                                                                                                              |                   |
| Legally Compliant?:  | Not Specified                                                                                                                                                                                                                                                                                                                                                                                                                |                   |
| Full Reference:      | S - 65168 - 25270 - PM/SC/7/A - None                                                                                                                                                                                                                                                                                                                                                                                         |                   |
| <b>65169 Support</b> | <b>Respondent: Dr Leonard Mead [25271]</b>                                                                                                                                                                                                                                                                                                                                                                                   | <b>Agent: N/A</b> |
| Summary:             | H/1: i Land at Linton Road, Great Abington                                                                                                                                                                                                                                                                                                                                                                                   |                   |
|                      | I support this provided the number of dwellings remains at 35 with a community orchard and the retention of the allotment site.                                                                                                                                                                                                                                                                                              |                   |
| Change To Plan:      |                                                                                                                                                                                                                                                                                                                                                                                                                              |                   |
| Legally Compliant?:  | Not Specified                                                                                                                                                                                                                                                                                                                                                                                                                |                   |
| Full Reference:      | S - 65169 - 25271 - PM/SC/7/A - None                                                                                                                                                                                                                                                                                                                                                                                         |                   |

65170 Support

Respondent: Dr Leonard Mead [25271]

Agent: N/A

Summary: H/1: k Land at Bancroft Farm, Church Lane, Little Abington

I support 6 cottage style dwellings that do not encroach on the meadow at the rear. Also I feel it should not encroach towards the corner with Bourn Bridge Road and the large trees should be retained.

Change To Plan:

Legally Compliant?: Not Specified

Full Reference: S - 65170 - 25271 - PM/SC/7/A - None

65171 Support

Respondent: Mr Brian Haydensmith [25272]

Agent: N/A

Summary: H/1: i Land at Linton Road, Great Abington

Support this modification PROVIDED the allotments are retained - and formally recorded in Local Plan to give protection, and there is the Community Orchard\*.

If the application comes in for 45 homes on the Linton Rd site, I would continue to support PROVIDED there is long term protection for the allotments - a vital local amenity asset - and the Community Orchard\*.

\* I would not object if the Community Orchard was a belt of trees.

Change To Plan:

Legally Compliant?: Not Specified

Full Reference: S - 65171 - 25272 - PM/SC/7/A - None

65172 Support

Respondent: Mrs Rosemary Mead [25273]

Agent: N/A

Summary: H/1: k Land at Bancroft Farm, Church Lane, Little Abington

Support and object.

I support the encroachment of the Conservation Area with a high quality development of 6 cottages suitable for 'downsizers' with generous room sizes.

I support the creation of a landscape buffer.

I support the retention of the mature trees along the road to retain the character of the lane.

I object to the encroachment on the previously PVAA land and any encroachment towards the corner with Bourn Bridge Road.

I would like the houses to be set back from the road to match the design opposite.

Change To Plan:

Legally Compliant?: Not Specified

Full Reference: S - 65172 - 25273 - PM/SC/7/A - None

65173 Support

Respondent: Mrs Jane Bowen [2894]

Agent: N/A

Summary: General comments to Great and Little Abington proposals

The proposals shown today seem well considered and proportionate.  
A cyclepath/footpath will be needed on the Pampisford Road - along it's entirety to join by Granta Park roundabout.

Specific comments to H/1: i Land at Linton Road, Great Abington.

I would rather the Linton Road site had 35 houses rather than 45 - however we do need the housing, especially social and the 80% of market cost ones.

Change To Plan:

Legally Compliant?: Not Specified

Full Reference: S - 65173 - 2894 - PM/SC/7/A - None

65174 Support

Respondent: Tania O'Farrell [16744]

Agent: N/A

Summary: Pampisford Road CYCLE PATH FOR WHOLE LENGTH and lane for home riders and pavement for pedestrians.

Change To Plan:

Legally Compliant?: Not Specified

Full Reference: S - 65174 - 16744 - PM/SC/7/A - None

65226 Support

Respondent: Mrs Penelope Zimmern [25274]

Agent: N/A

Summary: In respect of the Great and Little Abington local plan major modifications I wish to give my full support to the development of all three sites in the two villages. The community has been consulted locally and given its blessing to these developments. We have a lot of people who live in large houses and would like to downsize. We also have young families who qualify for affordable housing and have had to move to places like Haverhill. Many of these young families would very much like to come back to the Abingtons and have had great difficulty in achieving this.

Change To Plan:

Legally Compliant?: Not Specified

Full Reference: S - 65226 - 25274 - PM/SC/7/A - None

65478 Support

Respondent: Bernard Talbot [25373]

Agent: N/A

Summary: H/1k: Land at Bancroft Farm, Church Lane, Little Abington

I would like to support the inclusion of this site in the Local Plan. Three sites within the village were consulted on and there was strong support in favour of the proposals. We need more affordable homes and those suitable for residents to downsize to within the village to allow it to grow and keep it alive. I would like to see this site included in the Local Plan and for the homes to be delivered as soon as possible.

Change To Plan:

Legally Compliant?: Not Specified

Full Reference: S - 65478 - 25373 - PM/SC/7/A - None

65479 Support

Respondent: Bernard Talbot [25373]

Agent: N/A

Summary: H/1:j Land at High Street / Pampisford Road, Great Abington

I would like to support the inclusion of this site in the Local Plan. Three sites within the village were consulted on and there was strong support in favour of the proposals. We need more affordable homes and those suitable for residents to downsize to within the village to allow it to grow and keep it alive. I would like to see this site included in the Local Plan and for the homes to be delivered as soon as possible.

Change To Plan:

Legally Compliant?: Not Specified

Full Reference: S - 65479 - 25373 - PM/SC/7/A - None

65480 Support

Respondent: Bernard Talbot [25373]

Agent: N/A

Summary: H/1:i Land at Linton Road, Great Abington

I would like to support the inclusion of this site in the Local Plan. Three sites within the village were consulted on and there was strong support in favour of the proposals. We need more affordable homes and those suitable for residents to downsize to within the village to allow it to grow and keep it alive. I would like to see this site included in the Local Plan and for the homes to be delivered as soon as possible.

Change To Plan:

Legally Compliant?: Not Specified

Full Reference: S - 65480 - 25373 - PM/SC/7/A - None

65484 Support

Respondent: Committee for Abington Housing (Bernie Talbot) [21480]

Agent: N/A

Summary: H/1k: Land at Bancroft Farm, Church Lane, Little Abington

The Committee for Abington Housing, representing both Great and Little Abington Parish Councils, proposed three sites for development within The Abingtons. These appear in the draft Local Plan as major amendments. Great Abington Parish Council agreed on January 18th to submit comments in support of these sites. The sites were selected and consultation carried out within the community resulting in 75% in favour. An earlier housing survey identified need for affordable homes and those suitable for residents to downsize to. The Parish Council is keen for the sites to be included in the Local Plan and for homes to be delivered as soon as possible.

Change To Plan:

Legally Compliant?: Not Specified

Full Reference: S - 65484 - 21480 - PM/SC/7/A - None

65485 Support

Respondent: Committee for Abington Housing (Bernie Talbot) [21480]

Agent: N/A

Summary: H/1:j Land at High Street / Pampisford Road, Great Abington

The Committee for Abington Housing, representing both Great and Little Abington Parish Councils, proposed three sites for development within The Abingtons. These appear in the draft Local Plan as major amendments. Great Abington Parish Council agreed on January 18th to submit comments in support of these sites. The sites were selected and consultation carried out within the community resulting in 75% in favour. An earlier housing survey identified need for affordable homes and those suitable for residents to downsize to. The Parish Council is keen for the sites to be included in the Local Plan and for homes to be delivered as soon as possible.

Change To Plan:

Legally Compliant?: Not Specified

Full Reference: S - 65485 - 21480 - PM/SC/7/A - None

## 65486 Support

**Respondent: Committee for Abington Housing (Bernie Talbot) [21480]**

**Agent: N/A**

Summary: H/1:i Land at Linton Road, Great Abington

The Committee for Abington Housing, representing both Great and Little Abington Parish Councils, proposed three sites for development within The Abingtons. These appear in the draft Local Plan as major amendments. Great Abington Parish Council agreed on January 18th to submit comments in support of these sites. The sites were selected and consultation carried out within the community resulting in 75% in favour. An earlier housing survey identified need for affordable homes and those suitable for residents to downsize to. The Parish Council is keen for the sites to be included in the Local Plan and for homes to be delivered as soon as possible.

Change To Plan:

Legally Compliant?: Not Specified

Full Reference: S - 65486 - 21480 - PM/SC/7/A - None

## 65585 Support

**Respondent: Anglian Water Services Limited (Sue Bull) [15648]**

**Agent: N/A**

Summary: All sites

Please find attached RAG sheet summarising our views on serving the sites revised and included in the modifications.  
[Spreadsheet shows an overall RAG rating of Amber - Infrastructure and/or treatment upgrades required to serve proposed growth or diversion of assets may be required]

Change To Plan:

Legally Compliant?: Not Specified

Full Reference: S - 65585 - 15648 - PM/SC/7/A - None

## 65696 Support

**Respondent: Mr E H Taylor [25423]**

**Agent: N/A**

Summary: H/I:K

Bancroft Farm Little Abington

My support for the Modification is strictly on the understanding that the site will not be enlarged.

It is important that the designated site is not extended either further along Church Lane or into the meadow.

No more than six single storey dwellings should be built (as proposed in the Modification).

The boundary of the designated site is logical and clearly defined, and should be respected as the limit for all development. Any landscaping outside this boundary should be limited to trees in the meadow and not developed into gardens, which will inevitably contain sheds, greenhouses etc.

Change To Plan:

Legally Compliant?: Not Specified

Full Reference: S - 65696 - 25423 - PM/SC/7/A - None

## 65701 Support

**Respondent: Mrs Evelyn Ward [25424]**

**Agent: N/A**

Summary: H/I:k

I support the modification so long as the site remains the same site. Certainly not to extend into the meadow or continue further along Church Lane.

As proposed in the Modification, no more than six dwellings should be erected. The boundary of the site should be kept to and as a limit for all development. No gardens should be allowed to be developed outside the boundary of the site.

Change To Plan:

Legally Compliant?: Not Specified

Full Reference: S - 65701 - 25424 - PM/SC/7/A - None

65747 Support

Respondent: County Cllr Tony Orgee [1461]

Agent: N/A

Summary: I fully support the three sites H/1i, H/1j and H/1k put forward by Great Abington Parish Council and Little Abington Parish Council. The consultation document sets out the site details and the indicative number of houses for each site as in the local consultation. These sites followed extensive local discussions and consultations, and each received support from 75% or more of respondents.

Change To Plan:

Legally Compliant?: Not Specified

Full Reference: S - 65747 - 1461 - PM/SC/7/A - None

65794 Support

Respondent: Historic England (Mr David Grech) [23622]

Agent: N/A

Summary: In respect of Housing Land Supply, Historic England has reviewed the revised housing allocation map (Figure 3.2) prepared by the Councils and again we do not wish to comment in detail on either the New Proposal site in the City or the New Proposal Site in SCDC.

Nor do we object to the main modifications proposed to the South Cambridgeshire Local Plan in respect of the Development Strategy as set out in paragraphs 2.42, 2.43, 2.44, 2.45 and 2.47. We positively support the main modification proposed to the South Cambridgeshire Local Plan in respect of the Development Strategy as set out in paragraph 2.46.

Change To Plan:

Legally Compliant?: Not Specified

Full Reference: S - 65794 - 23622 - PM/SC/7/A - None

65836 Support

Respondent: Edward O 'Sullivan [25303]

Agent: N/A

Summary: H/1:k Land at Bancroft Farm, Church Lane, Little Abington

I am all for new housing developments where the local community also have a say and where the decisions are taken at that local level and then approved by their Parish Council and in line with the Local Plan.

Little Abington Parish Council supported a small development at the above disused farm with the recommendation that six properties was appropriate without impinging the meadow behind the proposed development. I support the Parish Council view not to extend the .42 ha or the total number of six dwellings , bearing in mind this is a conservation area and should not to be messed with. This is what the community wants regardless of the developer's bleating.

Change To Plan:

Legally Compliant?: Not Specified

Full Reference: S - 65836 - 25303 - PM/SC/7/A - None

## 65844 Support

**Respondent:** Little Abington Parish Council (Mrs Genevieve Dalton) [89]

**Agent:** N/A

Summary: Sites included in plan following local housing needs survey and consultation on several options with community - demonstrable support.

Key is housing to enable intergenerational living - housing for young and growing families, significant proportion of affordable housing , older people looking to downsize. Not much need for large executive housing.

Importance of maintaining character of both villages - developments should be in keeping with existing environment and housing density. Must include adequate provision and protect existing open space.

Encourage community cohesion. Preserve current allotments. Support development of Community Orchard close to village centre. Both benefit and for enjoyment of both villages.

Concerns about traffic and speeding - needs managing . Consider cycleways and public transport. Must address A1307.

School already oversubscribed - capacity needs increasing. Improve access to health care.

Improve provision for pedestrians - protect / develop new Public Rights Of Way.

Change To Plan:

Legally Compliant?: Not Specified

Full Reference: S - 65844 - 89 - PM/SC/7/A - None

## 65845 Support

**Respondent:** Little Abington Parish Council (Mrs Genevieve Dalton) [89]

**Agent:** N/A

Summary: H/1:k Land at Bancroft Farm, Church Lane, Little Abington

Proposal included in Plan because it was Parish Council led proposal with demonstrable local support . Should be no more than 6 dwellings within existing boundary of old farmyard and retaining existing flint wall. Development should enhance Conservation Area with high quality development of cottages with generous room sizes suitable for 'downsizers'.

Priority to preserve open green space behind site, until recently used as grazing land. Meadow enjoyed by residents now designated as Local Green Space. Fencing recently erected by landowner, spoiling openness of site - does not define boundary of any development. Creation of landscape buffer along rear of site to provide soft green village edge should not be disregarded.

LAPC is unlikely to support applications to develop site that do not fulfil aspirations of Parish Council and local residents.

Change To Plan:

Legally Compliant?: Not Specified

Full Reference: S - 65845 - 89 - PM/SC/7/A - None

|          |                     |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |                                                             |
|----------|---------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------|
| Page 256 | <b>65459 Object</b> | <b>Respondent:</b> Mr G Dash [25368]                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         | <b>Agent:</b> hd planning (Mrs Hayley Doyle) [25367]        |
|          | Summary:            | We believe that this modification doesn't deliver the flexibility to the Local Plan as envisaged in the DEFRA and Government guidance. Although we encourage the allowance of villages to expand to cater for local needs, allowing three sites within the Local Plan at this late stage is a very narrow, inflexible approach towards allowing organic growth in the villages over the plan period.                                                                                                                                                                                                                                                                                                                                                         |                                                             |
|          | Change To Plan:     | We advocate a more criteria based policy approach to sites of this nature to allow other Parish Councils and other sites with local support to come forward through the plan period.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |                                                             |
|          | Legally Compliant?: | No                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |                                                             |
|          | Full Reference:     | O - 65459 - 25368 - PM/SC/7/B - ii, iii, iv                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |                                                             |
|          | <b>65841 Object</b> | <b>Respondent:</b> CALA Homes (North Homes Counties) Ltd [25454]                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             | <b>Agent:</b> Carter Jonas LLP (Brian Flynn) [17331]        |
|          | Summary:            | We do not object to the parish council-led housing allocations at Great Abington, Little Abington and Graveley. However, we do question the approach adopted by the Council that allocates land in Group and Infill Villages but other sites at a similar level of the settlement hierarchy were not even considered or assessed for development e.g. land off Highfields Road in Caldecote. The benefits associated with the proposed allocations could equally apply to other sustainable villages e.g. contribute to the housing land supply, meet local housing needs, and support the rural economy and local services and facilities.                                                                                                                  |                                                             |
|          |                     | In other circumstances potential development sites in Group and Infill Villages have been rejected or not assessed because the development strategy does not anticipate any significant development at this level of the settlement hierarchy, with development site size limits imposed on these villages. This is an inconsistent approach.                                                                                                                                                                                                                                                                                                                                                                                                                |                                                             |
|          | Change To Plan:     |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |                                                             |
|          | Legally Compliant?: | Not Specified                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |                                                             |
|          | <b>65867 Object</b> | <b>Respondent:</b> Mr Roger Worboys [3125]                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   | <b>Agent:</b> Carter Jonas LLP (Brian Flynn) [17331]        |
|          | Summary:            | We do not object to the parish council-led housing allocations. However, we do question the approach adopted by the Council that allocates land in Group and Infill Villages but other sites at a similar level of the settlement hierarchy were not even considered for development. The benefits associated with the proposed allocations could equally apply to other sustainable villages e.g. contribute to the housing land supply, meet local housing needs, and support the rural economy and local services and facilities.                                                                                                                                                                                                                         |                                                             |
|          |                     | In other circumstances potential development sites in Group and Infill Villages have been rejected because the development strategy does not anticipate any significant development at this level of the settlement hierarchy, with development site size limits imposed on these villages. This is an inconsistent approach.                                                                                                                                                                                                                                                                                                                                                                                                                                |                                                             |
|          | Change To Plan:     |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |                                                             |
|          | Legally Compliant?: | Not Specified                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |                                                             |
|          | <b>66059 Object</b> | <b>Respondent:</b> Laragh Homes [25312]                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      | <b>Agent:</b> Strutt & Parker LLP (Mr Jon Jennings) [25077] |
|          | Summary:            | Swavesey offers an excellent opportunity to deliver more housing in a sustainable location and within the next five years. The village is outside the Green Belt, located on the guided busway with good public transport connecting to St Ives, Cambridge and Northstowe, making it an ideal location for development. Swavesey will therefore benefit from the services and facilities in Northstowe. There are planned improvements to the A14 which will have a positive impact on local traffic conditions. Additionally housing in the village will provide investment in the community, much needed housing and support for existing services and facilities including the guided busway. The site should be allocated for development in Policy H/1. |                                                             |
|          | Change To Plan:     | Delete & amend modification                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |                                                             |
|          | Legally Compliant?: | Not Specified                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |                                                             |
|          | Full Reference:     | O - 66059 - 25312 - PM/SC/7/B - i, ii, iii, iv                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |                                                             |



## 66177 Object

**Respondent: Great Shelford Ten Acres Limited [8948]**

**Agent: Bidwells (Mrs Stacey Rawlings) [3140]**

Summary: Great Shelford (Ten Acres) Ltd object to the Proposed Modification to Policy H/1 through the allocation of additional housing in less sustainable settlements. This is contrary to the over-arching strategy set out in Policy S/1. The modification does not address the rural housing shortfall.

See attached documents:

\* PM\_SC\_7\_B.pdf

\* Critique of the Councils' Sustainability Appraisal.pdf

\* Critique of the Councils' Housing Land Supply.pdf

\* Critique of the Councils' OAN.pdf

Change To Plan: Land at Great Shelford (Site 005) should be released from the Green Belt to provide additional options for development in the more sustainable villages.

Legally Compliant?: Not Specified

Full Reference: O - 66177 - 8948 - PM/SC/7/B - i, ii, iii, iv

## 65586 Support

**Respondent: Anglian Water Services Limited (Sue Bull) [15648]**

**Agent: N/A**

Summary: Please find attached RAG sheet summarising our views on serving the sites revised and included in the modifications. [Spreadsheet shows an overall RAG rating of Amber - Infrastructure and/or treatment upgrades required to serve proposed growth or diversion of assets may be required]

Change To Plan:

Legally Compliant?: Not Specified

Full Reference: S - 65586 - 15648 - PM/SC/7/B - None

## 65673 Support

**Respondent: Mr Simon Miller [25395]**

**Agent: D H Barford & Co Limited (Mr Martin Page) [2332]**

Summary: Support for proposed modification PM/SC/7/B

The land owner supports allocation Policy H/1:I as this is consistent with the NPPF for the following reasons:

\* Reflects local wishes;

\* Will enable the effective use of previously developed land;

\* Will support the village facilities and provide housing that will contribute to the village vitality;

\* Will enhance the setting;

\* The current commercial activity is already a generator of vehicle trip movements and the proposed development will be no less sustainable in this respect;

\* Will contribute to meeting the district's housing need.

In relation to the policy requirements, these can be satisfactorily addressed at the detailed design and layout stage.

Change To Plan:

Legally Compliant?: Not Specified

Full Reference: S - 65673 - 25395 - PM/SC/7/B - None

## 65795 Support

**Respondent: Historic England (Mr David Grech) [23622]**

**Agent: N/A**

Summary: In respect of Housing Land Supply, Historic England has reviewed the revised housing allocation map (Figure 3.2) prepared by the Councils and again we do not wish to comment in detail on either the New Proposal site in the City or the New Proposal Site in SCDC.

Nor do we object to the main modifications proposed to the South Cambridgeshire Local Plan in respect of the Development Strategy as set out in paragraphs 2.42, 2.43, 2.44, 2.45 and 2.47. We positively support the main modification proposed to the South Cambridgeshire Local Plan in respect of the Development Strategy as set out in paragraph 2.46.

Change To Plan:

Legally Compliant?: Not Specified

Full Reference: S - 65795 - 23622 - PM/SC/7/B - None

CHAPTER: Appendix C: Proposed main PM/SC/7/C  
modifications to the Submission

**65803 Support**      **Respondent: Historic England (Mr David Grech) [23622]**      **Agent: N/A**

Summary: Aside from this, we do not object to the other main modifications proposed to the Cambridge Local Plan in respect of Written Ministerial Statements as set out in paragraph 2.55, nor do we object to the main modifications proposed to the South Cambridgeshire Local Plan in respect of the Written Ministerial Statements as set out in paragraph 2.56, 2.67 and 2.58 of the Joint Consultation Report.

Change To Plan:

Legally Compliant?: Not Specified

Full Reference: S - 65803 - 23622 - PM/SC/7/C - None

CHAPTER: Appendix C: Proposed main PM/SC/7/D  
modifications to the Submission

**65808 Support**      **Respondent: The Taylor Family & Countryside Properties (UK) Ltd [19841]**      **Agent: Andrew Martin - Planning Limited (Mr Andrew Martin) [16509]**

Summary: Countryside Properties support the Council's proposed amendments to remove the Code for Sustainable Homes as this has been withdrawn following the Housing Standards Review.

Change To Plan:

Legally Compliant?: Not Specified

Full Reference: S - 65808 - 19841 - PM/SC/7/D - None

**65742 Object**      **Respondent: Cambridge University Health Partners (Dr Hans Hagen) [25440]**      **Agent: N/A**

Summary: Given; current stress on South Cambridgeshire's transport infrastructure; shortage of housing our lower paid staff can afford to buy/ rent and cost of commuting we wish to encourage the development of housing within walking or cycling distance of CBC and neighbouring growth sites or with effective public transport links, unhindered by congestion. There are sound sustainability arguments favouring this.  
We support this Modification but wish emphasis to be on need for other kinds of housing products including priority lettings and restricted occupation schemes for lower paid and vital specialist CBC staff. We note a number of proposed developments in urban fringe include/ are willing to include a mix of housing which would meet CBC needs are currently prohibited by the proposed Local Plan and its Modifications.

Change To Plan: Amend Modification

Legally Compliant?: Not Specified

Full Reference: O - 65742 - 25440 - PM/SC/7/F - None

**65766 Object**      **Respondent: Urban & Civic [24293]**      **Agent: David Lock Associates (Darren Bell) [24750]**

Summary: Support objective of delivering a wide choice, type and mix of housing. Government's intention to support starter homes through proposed changes to NPPF and custom and self-build guidance (PPG Reference ID: 2a-021-20150326). SCDC is vanguard authority and has self-build register. Strategic sites can deliver wide range of housing types and tenures. In applying Policy H/8 flexibility needed to ensure different local housing needs can be met over time.

Demonstrable need for increase in private rental sector homes in Greater Cambridge. Strong relationship with growing employment sectors in Cambridge but existing constraints due to lack of such homes on market. Evidence on importance and potential of private rental market (Cambridgeshire sub-region Strategic Housing Market Assessment). Paragraph 7.24 provides support for private rental sector - suggest Policy H/8 revised: Insert "those wishing to rent on the open market" after "those seeking starter homes".

Change To Plan: Suggest Policy H/8 revised: Insert "those wishing to rent on the open market" after "those seeking starter homes".

Legally Compliant?: Not Specified

Full Reference: O - 65766 - 24293 - PM/SC/7/F - i

**65809 Object**      **Respondent: The Taylor Family & Countryside Properties (UK) Ltd [19841]**      **Agent: Andrew Martin - Planning Limited (Mr Andrew Martin) [16509]**

Summary: Market conditions and the demand for and supply of different sized homes will change during the plan period. Paragraph 1 should be amended to seek to provide a wide choice, mix and type of housing, based on demand set out in the most up to date SHMA or housing needs survey. This will provide developers with sufficient flexibility to tailor their proposals to the local housing needs at that point in time.

The change to include starter homes and for consideration to be given to people building their own homes needs to be taken into account in assessing the financial viability of a strategic scheme or in the context of a Development Framework Document for a strategic site. The same need for flexibility and change should be applied to starter homes as to the general housing mix.

Change To Plan: Amend modification.

Legally Compliant?: Not Specified

Full Reference: O - 65809 - 19841 - PM/SC/7/F - i

## 65898 Object

**Respondent: Home Builders Federation (Mr James Stevens) [15801]**

**Agent: N/A**

Summary: Residential Space Standards (Policy H/11) differs from Nationally Described Space Standards. Helpful if Council clarified intentions - take forward standards contrary to national policy. Necessary to address otherwise policy immediately out of date, and unenforceable.

NPPG 3 tests before Nationally Described Space Standards can be adopted as local plan policy:

- \* Need, including potential impact on providing Starter Homes;
- \* Viability including impact of affordability; and
- \* Timing

No assessment of need. Unclear whether homes built in South Cambridgeshire typically smaller than NDSS. Case for adopting NDSS not been made. Unclear how would affect provision of Starter Homes.

Viability - Council concluded standards not 'materially affect' viability (paragraph 2.2.12). Not assessed impact on affordability.

Unclear what Council is stipulating in terms of optional technical standards for accessibility.

Cost of complying with Part M4(2) and Part M4(3) treated as 'potential variable cost' - unclear.

Change To Plan:

Legally Compliant?: Not Specified

Full Reference: O - 65898 - 15801 - PM/SC/7/F - iv

## 65906 Object

**Respondent: Mr Henry d'Abo [2433]**

**Agent: N/A**

Summary: Responding to modifications in light of contents of Government's Rural Productivity Plan - priorities for growing rural economy and need to increase availability of housing in rural areas. Intend to restore Estate to former glory. Wish to develop high tech engineering spaces on brownfield sites combined with some low cost housing.

Support proposed modifications but they do not reflect emerging changes in national planning policy included in consultation on NPPF, Spending Review, Autumn Statement 2015 and Housing and Planning Bill; Rural Productivity Plan. Support changes to Policy H/8 but wording of Policies S/7 and S/11 inflexible approach to rural housing - not reflecting approach described in emerging Government guidance.

Change To Plan:

Legally Compliant?: Not Specified

Full Reference: O - 65906 - 2433 - PM/SC/7/F - iv

## 65804 Support

**Respondent: Historic England (Mr David Grech) [23622]**

**Agent: N/A**

Summary: Aside from this, we do not object to the other main modifications proposed to the Cambridge Local Plan in respect of Written Ministerial Statements as set out in paragraph 2.55, nor do we object to the main modifications proposed to the South Cambridgeshire Local Plan in respect of the Written Ministerial Statements as set out in paragraph 2.56, 2.67 and 2.58 of the Joint Consultation Report.

Change To Plan:

Legally Compliant?: Not Specified

Full Reference: S - 65804 - 23622 - PM/SC/7/F - None

## 65956 Support

**Respondent: Bloor Homes Eastern [16420]**

**Agent: Pegasus Planning Group (Nicky Parsons) [15818]**

Summary: Modifications PM/SC/7/F and PM/SC/7/G reflect the Government's expectation that local planning authorities should plan and provide for Starter Homes. These modifications are welcomed as Starter Homes can offer a lower-cost route into homeownership and help contribute towards a healthy mix of new homes and types, in turn contributing towards the presence of a mixed community.

Change To Plan:

Legally Compliant?: Not Specified

Full Reference: S - 65956 - 16420 - PM/SC/7/F - None

**65400 Object**

**Respondent: Brookgate CB4 Ltd [23741]**

**Agent: Bidwells (Mr Neil Waterson) [5661]**

Summary: The proposed requirement for all sites of 20 or more dwellings to include plots for self and custom builders is not supported. The proposed requirement is onerous, unjustified and is not sufficiently flexible to allow for individual site circumstances.

Such a requirement would not be appropriate in the context of a high density mixed use scheme such as that proposed at Chesterton Sidings.

The policy requirement is therefore unsound in that it is not effective and is not consistent with National Policy within the NPPF.

Change To Plan: The Policy should be amended as follows:

"On all sites of 20 or more dwellings, and in each phase of strategic sites, the Council will seek the provision of dwellings plots for self or custom builders subject to individual site circumstances."

Legally Compliant?: Yes

Full Reference: O - 65400 - 23741 - PM/SC/7/G - iii, iv

**65580 Object**

**Respondent: D H Barford & Co Limited (Mr Martin Page) [2332]**

**Agent: D H Barford & Co Limited (Mr Martin Page) [2332]**

Summary: For the reasons explained the Council's proposed strategy will not realise the Government's stated aim to improve significantly the new self-build opportunities. Achieving the successful delivery will therefore be dependent on a more proactive approach and this should include accepting self-build developments on exception sites through an additional policy along the lines:

Self-build housing developments on suitable sites adjoining a development framework boundary will be permitted, subject to the development being of a scale and location appropriate to the size, facilities and character of the settlement.

Change To Plan: Amend the strategy to include accepting self-build developments on exception sites in appropriate locations on the edge of settlements.

Legally Compliant?: No

Full Reference: O - 65580 - 2332 - PM/SC/7/G - None

**65744 Object**

**Respondent: Cambridge University Health Partners (Dr Hans Hagen) [25440]**

**Agent: N/A**

Summary: Given; current stress on South Cambridgeshire's transport infrastructure; shortage of housing our lower paid staff can afford to buy/ rent and cost of commuting we wish to encourage the development of housing within walking or cycling distance of CBC and neighbouring growth sites or with effective public transport links, unhindered by congestion. There are sound sustainability arguments favouring this. We support this Modification but wish emphasis to be on need for other kinds of housing products including priority lettings and restricted occupation schemes for lower paid and vital specialist CBC staff. We note a number of proposed developments in urban fringe include/ are willing to include a mix of housing which would meet CBC needs are currently prohibited by the proposed Local Plan and its Modifications.

Change To Plan:

Legally Compliant?: Not Specified

Full Reference: O - 65744 - 25440 - PM/SC/7/G - None

## 65821 Object

**Respondent: The Taylor Family & Countryside Properties (UK) Ltd [19841]**

**Agent: Andrew Martin - Planning Limited (Mr Andrew Martin) [16509]**

Summary: This modification proposes that on all sites of 20 or more dwellings and in each phase of strategic sites, developers will supply dwelling plots for sale to self and custom builders. We object to this low threshold and seek flexibility to respond on a site by site basis in line with current housing needs and requirements.

It may not always be practical on a strategic site to have self build in each phase of development. A more flexible approach is required. On such sites it may be that larger clusters of plots for self build are preferable to ensure compatibility with the wider proposals. A Development Framework Document for a large strategic site will be best placed to determine the scale, location and timing of such self build proposals.

Change To Plan: Amend modification.

Legally Compliant?: Not Specified

Full Reference: O - 65821 - 19841 - PM/SC/7/G - i, ii, iii

## 65907 Object

**Respondent: Mr Henry d'Abo [2433]**

**Agent: N/A**

Summary: Responding to modifications in light of contents of Government's Rural Productivity Plan - priorities for growing rural economy and need to increase availability of housing in rural areas. Intend to restore Estate to former glory. Wish to develop high tech engineering spaces on brownfield sites combined with some low cost housing.

Support proposed modifications but they do not reflect emerging changes in national planning policy included in consultation on NPPF, Spending Review, Autumn Statement 2015 and Housing and Planning Bill; Rural Productivity Plan. Support changes to Policy H/8 but wording of Policies S/7 and S/11 inflexible approach to rural housing - not reflecting approach described in emerging Government guidance.

Change To Plan:

Legally Compliant?: Not Specified

Full Reference: O - 65907 - 2433 - PM/SC/7/G - iv

## 65978 Object

**Respondent: Hallmark Hotels (Bar Hill) Ltd [25472]**

**Agent: CgMs (Matthew Roe) [25471]**

Summary: The modification for part c in regards to self and custom built plots is too excessive and should instead be considered on a site specific basis.

We do not support part c of Policy H/8. Whilst it is recognised that self and custom build sites are important, the requirement for this on sites of 20 dwellings or more is considered to be too strict and inflexible. The excessive nature of the policy may result in the development proposal becoming economically unviable. Only permitting a developer to build out a vacant plot after it has been marketed unsuccessfully for 12 months can be considered a barrier to development. We would recommend that part c of the above policy is amended.

Change To Plan:

Legally Compliant?: Not Specified

Full Reference: O - 65978 - 25472 - PM/SC/7/G - None

## 66048 Object

**Respondent: Gladman Developments (Nicole Penfold) [19878]**

**Agent: N/A**

Summary: Gladman consider that the changes made to this policy to refer to self and custom build properties in unclear. The policy as proposed for modification does not set out a numerical requirement for self and custom build plots on any site. Therefore, the Policy is unclear and open to interpretation. The development industry needs to understand the implications of such policies to assist with the design of schemes and the consideration of the financial viability.

(May result in consequential changes to Mods PM/SC/7/I)

Change To Plan:

Legally Compliant?: Not Specified

Full Reference: O - 66048 - 19878 - PM/SC/7/G - None

## 66060 Object

**Respondent:** Laragh Homes [25312]

**Agent:** Strutt & Parker LLP (Mr Jon Jennings) [25077]

**Summary:** The insertion of para (C) requiring a proportion of dwelling plots to be for sale to custom builders on sites of 20 dwellings or more, appears to be a somewhat arbitrary figure that lacks an evidential base. The policy is vague, it does not specify what percentage of plots should be reserved for self builders, nor does it provide any design guidance that would ensure that self build plots do not appear incongruous within the setting of the wider development.

**Change To Plan:** Delete & amend modification

**Legally Compliant?:** Not Specified

**Full Reference:** O - 66060 - 25312 - PM/SC/7/G - i, ii, iii, iv

## 65805 Support

**Respondent:** Historic England (Mr David Grech) [23622]

**Agent:** N/A

**Summary:** Aside from this, we do not object to the other main modifications proposed to the Cambridge Local Plan in respect of Written Ministerial Statements as set out in paragraph 2.55, nor do we object to the main modifications proposed to the South Cambridgeshire Local Plan in respect of the Written Ministerial Statements as set out in paragraph 2.56, 2.67 and 2.58 of the Joint Consultation Report.

**Change To Plan:**

**Legally Compliant?:** Not Specified

**Full Reference:** S - 65805 - 23622 - PM/SC/7/G - None

## 65957 Support

**Respondent:** Bloor Homes Eastern [16420]

**Agent:** Pegasus Planning Group (Nicky Parsons) [15818]

**Summary:** Modifications PM/SC/7/F and PM/SC/7/G reflect the Government's expectation that local planning authorities should plan and provide for Starter Homes. These modifications are welcomed as Starter Homes can offer a lower-cost route into homeownership and help contribute towards a healthy mix of new homes and types, in turn contributing towards the presence of a mixed community.

**Change To Plan:**

**Legally Compliant?:** Not Specified

**Full Reference:** S - 65957 - 16420 - PM/SC/7/G - None

## 65958 Support

**Respondent:** Bloor Homes Eastern [16420]

**Agent:** Pegasus Planning Group (Nicky Parsons) [15818]

**Summary:** Reflects Government's expectation that demand for self-build and custom-build is addressed. Custom-build option provides additional flexibility for developers and owners and should be encouraged. Custom-build homes are those commissioned directly by the eventual homeowner but constructed by an experienced developer. More hands-off approach than self-build since the developer takes the lead in construction and project management of dwelling (helping to reduce risk of process for owner), however it gives owner opportunity to tailor dwelling to their own requirements. In contrast, self-build involves greater risk for owner as they take on all aspects of project and its co-ordination. In a broader sense this could result in delays to supply of housing from selfbuild sites as individual development projects run risk of delay and slippage.

**Change To Plan:**

**Legally Compliant?:** Not Specified

**Full Reference:** S - 65958 - 16420 - PM/SC/7/G - None

## 65977 Support

**Respondent:** Hallmark Hotels (Bar Hill) Ltd [25472]

**Agent:** CgMs (Matthew Roe) [25471]

**Summary:** We encourage policy which promotes the delivery of starter homes within the affordable homes tenure.

We support the Modification that promotes starter homes within affordable housing provision and policy that is in accordance with wider National Planning Policy Guidance. Our site has the potential accommodate a mixed tenure development, specifically starter homes and contribute towards the delivery of starter homes within South Cambridgeshire in accordance with the above proposed policy.

**Change To Plan:**

**Legally Compliant?:** Not Specified

**Full Reference:** S - 65977 - 25472 - PM/SC/7/G - None

66072 Support

Respondent: South Cambridgeshire Green Party (Miss Eleanor Crane) [25357]

Agent: N/A

Summary: We welcome the measures proposed to help those wishing to build their own homes.

We believe that self-builds can play an important role in supplying sufficient affordable and sustainable housing. Two of our members report that in the past they found it unaffordable to build a small eco-house because of the levy that was in place at the time. We therefore welcome the measures proposed to help those wishing to build their own homes (Policy H/8 section 2; Paragraph 7.24; new paragraph after Paragraph 7.27; new paragraph after Paragraph 10.42).

Change To Plan:

Legally Compliant?: Not Specified

Full Reference: S - 66072 - 25357 - PM/SC/7/G - None



**65462 Object**

**Respondent:** Mr G Dash [25368]

**Agent:** hd planning (Mrs Hayley Doyle) [25367]

Summary: We believe Policy H/10 also requires amendments to ensure that sites are able to come forward under the exceptions policy for starter and for self-build homes, as these forms of housing are now encouraged by the Government to be considered 'affordable homes'. The Council's modifications only partially address the ministerial statement by Brandon Lewis in March 2015 which is cited as one the reasons for the modification.

Change To Plan: Policy H/10 should also be amended and this change should be reflected throughout the relevant chapter of the Local Plan.

Legally Compliant?: No

Full Reference: O - 65462 - 25368 - PM/SC/7/H - iv

**65588 Object**

**Respondent:** D H Barford & Co Limited (Mr Martin Page) [2332]

**Agent:** D H Barford & Co Limited (Mr Martin Page) [2332]

Summary: For the reasons explained the Council's proposed strategy will not realise the Government's stated aim to improve significantly the new self-build opportunities. Achieving the successful delivery will therefore be dependent on a more proactive approach and this should include accepting self-build developments on exception sites through an additional policy along the lines:

Self-build housing developments on suitable sites adjoining a development framework boundary will be permitted, subject to the development being of a scale and location appropriate to the size, facilities and character of the settlement.

Change To Plan: Amend the strategy to include accepting self-build developments on exception sites in appropriate locations on the edge of settlements.

Legally Compliant?: No

Full Reference: O - 65588 - 2332 - PM/SC/7/H - iii, iv

**65908 Object**

**Respondent:** Mr Henry d'Abo [2433]

**Agent:** N/A

Summary: Responding to modifications in light of contents of Government's Rural Productivity Plan - priorities for growing rural economy and need to increase availability of housing in rural areas. Intend to restore Estate to former glory. Wish to develop high tech engineering spaces on brownfield sites combined with some low cost housing.

Support proposed modifications but they do not reflect emerging changes in national planning policy included in consultation on NPPF, Spending Review, Autumn Statement 2015 and Housing and Planning Bill; Rural Productivity Plan. Support changes to Policy H/8 but wording of Policies S/7 and S/11 inflexible approach to rural housing - not reflecting approach described in emerging Government guidance.

Change To Plan:

Legally Compliant?: Not Specified

Full Reference: O - 65908 - 2433 - PM/SC/7/H - iv

**66073 Support**

**Respondent:** South Cambridgeshire Green Party (Miss Eleanor Crane) [25357]

**Agent:** N/A

Summary: We welcome the measures proposed to help those wishing to build their own homes.

We believe that self-builds can play an important role in supplying sufficient affordable and sustainable housing. Two of our members report that in the past they found it unaffordable to build a small eco-house because of the levy that was in place at the time. We therefore welcome the measures proposed to help those wishing to build their own homes (Policy H/8 section 2; Paragraph 7.24; new paragraph after Paragraph 7.27; new paragraph after Paragraph 10.42).

Change To Plan:

Legally Compliant?: Not Specified

Full Reference: S - 66073 - 25357 - PM/SC/7/H - None

**65182 Object**                      **Respondent: Prof. Morna Hooker [25289]**                      **Agent: N/A**

Summary: The change is unnecessary, unjustified, and would damage wildlife

Change To Plan: I would hope that the suggestion would be dropped

Legally Compliant?: Yes

Full Reference: O - 65182 - 25289 - PM/SC/7/I - i, ii

**65594 Object**                      **Respondent: D H Barford & Co Limited (Mr Martin Page) [2332]**                      **Agent: D H Barford & Co Limited (Mr Martin Page) [2332]**

Summary: For the reasons explained the Council's proposed strategy will not realise the Government's stated aim to improve significantly the new self-build opportunities. Achieving the successful delivery will therefore be dependent on a more proactive approach and this should include accepting self-build developments on exception sites through an additional policy along the lines:

Self-build housing developments on suitable sites adjoining a development framework boundary will be permitted, subject to the development being of a scale and location appropriate to the size, facilities and character of the settlement.

Change To Plan: Amend the strategy to include accepting self-build developments on exception sites in appropriate locations on the edge of settlements.

Legally Compliant?: No

Full Reference: O - 65594 - 2332 - PM/SC/7/I - None

**65909 Object**                      **Respondent: Mr Henry d'Abo [2433]**                      **Agent: N/A**

Summary: Responding to modifications in light of contents of Government's Rural Productivity Plan - priorities for growing rural economy and need to increase availability of housing in rural areas. Intend to restore Estate to former glory. Wish to develop high tech engineering spaces on brownfield sites combined with some low cost housing.

Support proposed modifications but they do not reflect emerging changes in national planning policy included in consultation on NPPF, Spending Review, Autumn Statement 2015 and Housing and Planning Bill; Rural Productivity Plan. Support changes to Policy H/8 but wording of Policies S/7 and S/11 inflexible approach to rural housing - not reflecting approach described in emerging Government guidance.

Change To Plan:

Legally Compliant?: Not Specified

Full Reference: O - 65909 - 2433 - PM/SC/7/I - iv

**66061 Object**                      **Respondent: Laragh Homes [25312]**                      **Agent: Strutt & Parker LLP (Mr Jon Jennings) [25077]**

Summary: There is no evidence of the actual take up of the 229 people registered on the South Cambridgeshire Right to build register.

Change To Plan: Delete & amend modification

Legally Compliant?: Not Specified

Full Reference: O - 66061 - 25312 - PM/SC/7/I - i, ii, iii, iv

**65301 Support**                      **Respondent: Campaign to Protect Rural England (CPRE) (Miss Shirley Fieldhouse) [17302]**                      **Agent: N/A**

Summary: CPRE supports the policy on self-build and starter homes, provided that this policy is not used to reduce the amount of affordable housing.

Change To Plan:

Legally Compliant?: Not Specified

Full Reference: S - 65301 - 17302 - PM/SC/7/I - None

**66074 Support**

**Respondent:** South Cambridgeshire Green Party (Miss Eleanor Crane) [25357]

**Agent:** N/A

Summary: We welcome the measures proposed to help those wishing to build their own homes.

We believe that self-builds can play an important role in supplying sufficient affordable and sustainable housing. Two of our members report that in the past they found it unaffordable to build a small eco-house because of the levy that was in place at the time. We therefore welcome the measures proposed to help those wishing to build their own homes (Policy H/8 section 2; Paragraph 7.24; new paragraph after Paragraph 7.27; new paragraph after Paragraph 10.42).

Change To Plan:

Legally Compliant?: Not Specified

Full Reference: S - 66074 - 25357 - PM/SC/7/I - None

**65130 Object**

**Respondent:** Bridget Smith [17462]

**Agent:** N/A

Summary: No evidence of need for more employment land.

Significant harm to an environmentally sensitive site.

Change To Plan: I want this site to be removed from the plan

Legally Compliant?: Yes

Full Reference: O - 65130 - 17462 - PM/SC/8/A - i, ii

**65133 Object**

**Respondent:** Hobson's Conduit Trust (Mr Howard Slatter) [25159]

**Agent:** N/A

Summary: The proposed extension of the CBC runs far too close to Nine Wells LNR, the source of Hobson's Brook. The local landscape and environment would be drastically affected.  
Water quality would also be affected.  
This would also open up opportunities for further development in the green belt, e.g. a new railway station.

Change To Plan: This extension of the CBC should be removed from the list of proposed modifications. Failing that, an alternative site (as explained in comments above) should be found.

Legally Compliant?: Yes

Full Reference: O - 65133 - 25159 - PM/SC/8/A - None

**65138 Object**

**Respondent:** Mr John Meed [25199]

**Agent:** N/A

Summary: I carry out regular ecological surveys of the fields around Nine Wells, which includes the field identified in modification PM/SC/8/A. The area is valuable for red list farmland birds of high conservation concern including skylark, linnet, yellowhammer, corn bunting and yellow wagtail. Above all the area is likely to be one of the leading sites for grey partridge in Cambridgeshire, with at least 85 partridge in 2015. The species has declined by 91% in recent decades. The hedges on the southern edge of the field provide breeding sites for other red list species. PM/SC/8/A would be damaging to biodiversity.

Change To Plan: Retain the field identified in new policy E/1B (modification number PM/SC/8/A) within the green belt.

Legally Compliant?: No

Full Reference: O - 65138 - 25199 - PM/SC/8/A - i, ii, iii, iv

**65149 Object**

**Respondent:** Mr Chris Rand [25219]

**Agent:** N/A

Summary: There is no commercial need for this important wildlife habitat to be given over to the Cambridge Biotech Campus, which is already likely to stretch the south of the city's transport capacity right up to its limit.

Change To Plan: The area should remain within the Green Belt.

Legally Compliant?: Yes

Full Reference: O - 65149 - 25219 - PM/SC/8/A - ii, iv

**65150 Object**

**Respondent:** Mrs Lynda Warth [17545]

**Agent:** N/A

Summary: On behalf of the British Horse Society, I object to the proposals to extend the Cambridge Biomedical Campus because no consideration has been given to protecting the existing permissive network of bridleway access which crosses the area. This access is currently and has been for very many years, heavily used by pedestrians, dog walkers, cyclists and horse riders. It provides valuable, safe off road circular access. It also provides a link to the permissive bridleway around the Babraham Road P&R and the bridleway access part way up to the Beech Woods.

Change To Plan: The Modification should include for retaining, improving and dedicating the existing access as PRoW protecting the access for future generations for ALL users. The access should provide grass tracks as well as solid surfaces to meet all needs and should be of sufficient width to accommodate all users. Representatives of the user groups including the BHS should be consulted at the design stage.

Legally Compliant?: No

Full Reference: O - 65150 - 17545 - PM/SC/8/A - iv

65151 Object

Respondent: Sarah Lummis [25222]

Agent: N/A

Summary: Re: PM/SC/8/A  
There is no mention in this modified section of retaining the extensive bridleway network that exists in the proposed extended region of the Cambridge Biomedical Campus. These bridleways are heavily used and I consider them an essential amenity for the local community. They need to be incorporated into the proposed modification.

Change To Plan: The bridleways need to be incorporated into the proposed modification.

Legally Compliant?: No

Full Reference: O - 65151 - 25222 - PM/SC/8/A - iv

65153 Object

Respondent: Ms Rosemary Myers [25232]

Agent: N/A

Summary: The Southern Green Belt has been extended as far as it should be - to take more is surely against present Government policy? Offices do not need to built on this Green Belt land - with communication that is so sophisticated these days, offices could well be sited elsewhere. It will generate more traffic to an area that is already prone to smog on some summer days.

Change To Plan: The area around the unusual Nine Wells Site is a SSI. and should be maintained as such. Development should not be allowed to encroach on it under any circumstances.

Legally Compliant?: No

Full Reference: O - 65153 - 25232 - PM/SC/8/A - i, ii, iv

65154 Object

Respondent: Swavesey & District Bridleways Association (Ms Sue Rogers) [921]

Agent: N/A

Summary: Existing longtime-used permissive access should be recognised and recorded as Public Bridleway for enhancement of life quality, health and environment.

Change To Plan: Existing longtime-used permissive access should be recognised and recorded as Public Bridleway for enhancement of life quality, health and environment.

Legally Compliant?: Yes

Full Reference: O - 65154 - 921 - PM/SC/8/A - i, ii, iii, iv

65155 Object

Respondent: Dr Jon Lawrence [25234]

Agent: N/A

Summary: I see no reason for a further incursion into the Green Belt by the bio-medical campus and oppose this amendment. It is too close to the Nine Wells reserve and its sensitive ecological environment and I can seen no evidence of a proven need for this incursion at present. This piece-meal erosion of sensitive green belt will leave us with no natural environment at all around Cambridge if this continues.

Change To Plan: This proposed amendment be struck off and the plan revert to its original form - i.e. not crossing the city boundary.  
I would also point out that I have no way of knowing if these modifications comply with the law, I am not a lawyer 7 it is absurd that I have to tick a box - you should allow Do Not Know - I don't!

Legally Compliant?: Yes

Full Reference: O - 65155 - 25234 - PM/SC/8/A - ii

65156 Object

Respondent: Dr Denis Alexander [25236]

Agent: N/A

Summary: Nine Wells is a site of great natural beauty, historic interest and ecological significance. It is inevitable that the proposed development would further enroach on Green Belt without any justifiable need to do so, and would spoil the surroundings of, and approach to, Nine Wells. The Biomedical Research Campus has been already been designated huge amounts of land. Enough is enough.

Change To Plan: For this enroachment upon precious Green Belt not to happen.

Legally Compliant?: No

Full Reference: O - 65156 - 25236 - PM/SC/8/A - ii, iv

## 65157 Object

**Respondent:** Cambridge University Botanic Garden (Professor Beverley Glover)  
[25239]

**Agent:** N/A

**Summary:** The Botanic Garden's Grade II\* listed heritage landscape includes a lake and stream system fed solely by Hobson's Conduit. We are concerned that the proposed development might affect water quality and quantity from the springs in the LNR.

**Change To Plan:** We would like to see the proposed development adjacent to Nine Wells LNR suspended following a detailed hydrological assessment of consequences for the water supply to Hobson's Conduit.

**Legally Compliant?:** Yes

**Full Reference:** O - 65157 - 25239 - PM/SC/8/A - iv

## 65158 Object

**Respondent:** Mr David Holland [3274]

**Agent:** N/A

**Summary:** No one has demonstrated that there is any demand for the development of this land, let alone made a case that benefits of development would outweigh the damage that it would cause. The proposed amendment itself admits this: "there is no overall shortage of employment land within South Cambridgeshire for high-tech and research and development companies and organisations". This is commercial opportunism and should be resisted.

**Change To Plan:** This modification should not be accepted.

**Legally Compliant?:** Yes

**Full Reference:** O - 65158 - 3274 - PM/SC/8/A - ii

## 65159 Object

**Respondent:** Lawrence Grasty [25246]

**Agent:** N/A

**Summary:** "Whilst there is no overall shortage of employment land within South Cambridgeshire for high-tech and research and development companies and organisations" - I visit 9 Wells a couple of times a week. In the last month I've seen buzzards in the trees on the hospital side of the proposed development, also a barn owl hunting over the field. I can't see a justification for ripping up this truly green field, and encroaching on 9 Wells. In addition the developments are gradually becoming more visible from Gog Magog Down.

**Change To Plan:** Time to call a halt, and review what brownfield is available within the city, especially given recent building. The Green Belt must not be built on without a very good reason - the plan's note that "Whilst there is no overall shortage of employment land within South Cambridgeshire for high-tech and research and development companies and organisations..." shows there is not one.

**Legally Compliant?:** Yes

**Full Reference:** O - 65159 - 25246 - PM/SC/8/A - ii

## 65160 Object

**Respondent:** J Sinclair [20411]

**Agent:** N/A

**Summary:** We must retain wildlife corridors around the green belt and protect the fringes from disturbance for the benefit of wildlife and people.

**Change To Plan:** For buildings not to encroach within quarter of a mile of the Nine Wells LNR.

**Legally Compliant?:** No

**Full Reference:** O - 65160 - 20411 - PM/SC/8/A - i

## 65162 Object

**Respondent:** Isabelle Fournier [25253]

**Agent:** N/A

**Summary:** I object on the grounds it will damage biodiversity

**Change To Plan:** Keep this field in the green belt

**Legally Compliant?:** No

**Full Reference:** O - 65162 - 25253 - PM/SC/8/A - i, ii, iii, iv

- 65163 Object**

Respondent: Oliver Fournier [25263]

Agent: N/A

Summary: I object to this modification as it is likely to have a serious impact on the biodiversity of the area. The green space around Nine Wells is of great importance to a wide variety of specie and provides valuable habitat in addition to Nine Wells. The value of Nine Wells itself would be significantly reduced if the surrounding areas were built upon.

Change To Plan: Protection of the land around Nine Wells.

Legally Compliant?: Yes

Full Reference: O - 65163 - 25263 - PM/SC/8/A - i, ii
- 65176 Object**

Respondent: NICOLA MARRIAN [25276]

Agent: N/A

Summary: Please don't build on the green belt

Change To Plan: Stick to the original plan

Legally Compliant?: Yes

Full Reference: O - 65176 - 25276 - PM/SC/8/A - ii
- 65177 Object**

Respondent: Dr Roger Sewell [25099]

Agent: N/A

Summary: I do not believe it is appropriate to extend the biomedical campus beyond the city boundary and into the green belt. The campus is entirely big enough already, and as I have said elsewhere there is huge need to REDUCE the amount of employment in Cambridge, because there is too high a ratio of jobs to housing which leads to excessive traffic, and any increase in housing provision is thoroughly undesirable as Cambridge absolutely does NOT need to expand - it is quite big enough already.

Change To Plan: The extension marked E/1b should be removed and the Green Belt preserved.

Legally Compliant?: No

Full Reference: O - 65177 - 25099 - PM/SC/8/A - ii
- 65178 Object**

Respondent: Lynn Hieatt [25281]

Agent: N/A

Summary: Has the case been made about why further erosion of the Green Belt is necessary? What contribution would the loss of amenity (esp. given proximity to Nine Wells Nature Reserve) make to NHS services or to medical research? Any such additional incursion would seem to me to require evidence-based arguments.

Change To Plan: Before any such extension were granted, am evidence-based, well-argued case should be put to the Council. The onus should be on the proposed developers as to exactly what benefit would accrue from this proposed change to the Local Plan.

Legally Compliant?: Yes

Full Reference: O - 65178 - 25281 - PM/SC/8/A - ii
- 65179 Object**

Respondent: Mr Stuart Newman [25282]

Agent: N/A

Summary: A signifiante and irreversible impact on Nine Wells Springs, of natural and historic interest and value and of great amenity, on green belt land.

Change To Plan: This planning ammendment be rejected.

Legally Compliant?: No

Full Reference: O - 65179 - 25282 - PM/SC/8/A - ii, iv

**65185 Object**                      **Respondent: The Wildlife Trust (Miss Sian Williams) [8651]**                      **Agent: N/A**

Summary: The Wildlife Trust objects to this policy based on the lack of consideration given to biodiversity, and the unresolved questions around surface water flood risks.

Change To Plan: If this site is to be allocated, the policy must include a requirement to retain a significant area of the site for biodiversity enhancements to achieve no net loss of biodiversity and ideally a net gain. This will require appropriate ecological surveys and monitoring, and production and implementation of an ecological management plan to achieve this. This will need to cover protection and enhancement of Nine Wells LNR and measures to mitigate or compensate for the loss of habitat for red and amber list farmland bird species.

In particular, point b of the draft policy should refer to the need for not just an appropriate landscape setting for Nine Wells but to the need for an ecological buffer area to complement and enhance the habitat already present in the LNR. Points b and f are linked in their reference to access and public open space. Nine Wells is a particularly sensitive site which cannot cope with a significant increase in visitors. Therefore these two points should be reworded to ensure that designs of the open space within any proposed development would provide not only high quality open space for people, but also an attractive alternative to the LNR, to help limit additional access to and pressure on the LNR.

Legally Compliant?: Yes

Full Reference: O - 65185 - 8651 - PM/SC/8/A - iii, iv

**65186 Object**                      **Respondent: Mr J Whittingham [25245]**                      **Agent: N/A**

Summary: I am a S Cambs resident. I have registered on SCDC system in order to raise my strong objection to the proposal for land close to the Nine Wells to be removed Green Belt protection and added into the Biomedical campus site.

This meadow should be kept in the green belt in order to protect this rare and hugely significant adjacent Local Nature Reserve which would be damaged by developments in such close proximity (up to 30m I understand) and when there is plenty of space for development of the campus in other ways.

Change To Plan: This meadow should be kept in the green belt.

Legally Compliant?: Not Specified

Full Reference: O - 65186 - 25245 - PM/SC/8/A - None

**65225 Object**                      **Respondent: Mr Simon Hall [25260]**                      **Agent: N/A**

Summary: I am sending this Objection to the proposal to allow Green Belt land adjacent to Nine Wells to be used to extend the Addenbrooke's Site.

Change To Plan:

Legally Compliant?: Not Specified

Full Reference: O - 65225 - 25260 - PM/SC/8/A - None

**65232 Object**                      **Respondent: Southacre, Latham and Chaucer Roads Residents Association (SOLACHRA) (Mr Ian Gaseltine) [25275]**                      **Agent: N/A**

Summary: We believe that the removal of this important buffer field would mean development would take place only 30 meters away from Nine Wells an important nature reserve popular with locals. this is the source of Hobsons Conduit which must be protected.

Change To Plan: Protect the Green Belt at the draft plan boundary

Legally Compliant?: No

Full Reference: O - 65232 - 25275 - PM/SC/8/A - ii

**65234 Object**                      **Respondent: Dr Janet Lockwood [17593]**                      **Agent: N/A**

Summary: There does not seem adequate justification for removal of the land from the Green Belt, but there would be significant harm to the setting of the Nine Wells nature reserve and the associated wildlife, particularly bird species, if this land were built on.

Change To Plan: I would like this land to remain in the Green Belt.

Legally Compliant?: Yes

Full Reference: O - 65234 - 17593 - PM/SC/8/A - ii



65239 Object

Respondent: Essex County Council (Zhanine Smith) [20018] Agent: N/A

Summary: Only Green Belt matter of concern is extension to Cambridge Biomedical Campus (CBC). Cambridge Inner Green Belt Boundary Study identifies land south of CBC could be released for development without significant harm to Green Belt purposes; cited as justification. ECC recognises opportunity to provide high quality biomedical development on edge of Cambridge with locational benefits, without causing significant harm to purposes of Green Belt.

Whilst supportive of growth and development within bio-tech sector, it is important due consideration is given to impacts on strategic transportation network. Potential to draw traffic from Uttlesford and impact strategic transportation infrastructure. Key issues are A505/A1301 roundabout, already congested during peak periods, and A505 between M11 and A11.

No proposals to address congestion, or improve sustainable travel between Essex and Cambridge. ECC welcomes discussions to ensure appropriate highways mitigation measures are adopted, and working collaboratively with the Councils.

Change To Plan:  
Legally Compliant?: Not Specified

Full Reference: O - 65239 - 20018 - PM/SC/8/A - None

65243 Object

Respondent: yvonne steel [18941] Agent: N/A

Summary: There is no justification for further erosion of the green belt in that area. You seem to systematically destroy any heritage that Cambridge has left. Keep off this site!

Change To Plan: Delete modification.

Legally Compliant?: Not Specified

Full Reference: O - 65243 - 18941 - PM/SC/8/A - ii

65246 Object

Respondent: Mary Antcliff [19505] Agent: N/A

Summary: Cambridge Green Belt - Nine Wells.

I have just read about the latest threat to the Cambridge Green Belt to further the expansion of the Biomedical Campus - where is this creeping development going to stop?

Nine Wells is a very historic part of Cambridge and a favourite place for dog walkers and naturalists - it already feels encroached upon by the existing buildings. The green lung still left around the city is very precious and should be preserved.

I hope that S.Cambs and Cambridge City and all those who want to prevent an urban sprawl from spoiling Cambridge, will strongly petition against this threat.

Change To Plan:  
Legally Compliant?: Not Specified

Full Reference: O - 65246 - 19505 - PM/SC/8/A - None

65289 Object

Respondent: Mr David Cooper [25333] Agent: N/A

Summary: This urban sprawl in to the countryside at this site will have a serious detrimental impact on a well used rural haven for walkers with visual and noise disturbance for wildlife .Building up against a woodland walk and in close proximity to Nine Wells is an unnecessary intrusion into a valuable resource of land for recreational use on the edge of Cambridge and should therefore be protected for future generations.

Change To Plan: No development of this land or planting as woodland .

Legally Compliant?: No

Full Reference: O - 65289 - 25333 - PM/SC/8/A - ii

## 65328 Object

**Respondent: Andrew Chesher [25334]**

**Agent: N/A**

Summary: The proposed change will destroy the tranquility of the beautiful Nine Wells Nature Reserve. The sustainability of wild life will be prejudiced and a welcome green lung of Cambridge will be badly damaged.

Change To Plan: Leave Nine Wells Nature Reserve as it is with green fields and hedgerows around it.

Legally Compliant?: Yes

Full Reference: O - 65328 - 25334 - PM/SC/8/A - ii, iii, iv

## 65329 Object

**Respondent: Mr. Geoffrey V. Morson [25335]**

**Agent: N/A**

Summary: We who reside at 6-A Babraham Road, CB2 ORA object to the plans to expand the Addenbrooke's Biomedical campus to within 30 metres of Nine Wells. Ref: PM/SC/8/A

Change To Plan: No change as proposed.

Legally Compliant?: No

Full Reference: O - 65329 - 25335 - PM/SC/8/A - i, ii, iii, iv

## 65339 Object

**Respondent: Mrs Jean Bishop [25336]**

**Agent: N/A**

Summary: Encroachment on this important historical and biodiverse environment that is Nine Wells is totally wrong. The Green Belt is disappearing as is the green setting of the City itself. Yes, we will need advances in medicine but not at the expense of the environment. I object strongly.

Change To Plan: Protection of the Green Belt.

Legally Compliant?: No

Full Reference: O - 65339 - 25336 - PM/SC/8/A - ii

## 65357 Object

**Respondent: Clare Clark [25337]**

**Agent: N/A**

Summary: Completely inappropriate to build so close to a nature reserve that is trying to build up wildlife to return to SSSI status. Should not be allowed to build on clearly designated green belt land either.

Change To Plan: Keep the land as green belt and do not allow development.

Legally Compliant?: No

Full Reference: O - 65357 - 25337 - PM/SC/8/A - i, ii, iii, iv

## 65360 Object

**Respondent: Dr Lesley MacVinish [25338]**

**Agent: N/A**

Summary: The Biomedical Campus is currently recognised world-wide as a centre of research excellence and, as a member of the wider University, I fully support this world-class research environment. However, the green belt around the campus is being eroded and Ninewells is somewhere which should be preserved such that future generations have somewhere in South Cambridge to visit and to enjoy its wildlife and unique natural beauty.

Change To Plan: That this area of land is preserved and that the Biomedical Campus does not impinge on this area to any extent.

Legally Compliant?: Yes

Full Reference: O - 65360 - 25338 - PM/SC/8/A - ii

## 65367 Object

**Respondent: Trumpington Residents Association (Andrew Roberts) [5312]**

**Agent: N/A**

Summary: The Trumpington Residents' Association objects to the proposed policy. The Inner Green Belt Review 2015 misjudged the importance of this area to the Green Belt. The extension of the Cambridge Biomedical Campus into this site would cause significant harm to Green Belt purposes. The site provides a key buffer between the already approved site of the Cambridge Biomedical Campus and the countryside, including the important adjacent area of Nine Wells. In addition, the Council has failed to demonstrate that there are exceptional circumstances for the need for jobs at this location.

Change To Plan: Deletion of the new Policy E/1B, concerning development to the south of the Cambridge Biomedical Campus.

Legally Compliant?: Yes

Full Reference: O - 65367 - 5312 - PM/SC/8/A - i, ii, iv

## 65370 Object

**Respondent: Mrs Sam Davies [25340]**

**Agent: N/A**

Summary: In proposing this modification, SC District Council has neither established the need to remove this land from the green belt; nor taken account of the severity of its impact on local ecology, public amenity, traffic, visual impact and urban sprawl.

In supporting this modification, Cambridge City Council has breached the faith of local residents who were told that existing development represented a final urban edge to the city and has failed to carry out its responsibilities as guardian and owner of Nine Wells LNR.

Change To Plan: Modification PM/SC/A/8 should be discarded from the Local Plan.

Legally Compliant?: No

Full Reference: O - 65370 - 25340 - PM/SC/8/A - i, ii

## 65372 Object

**Respondent: Simon Roberts [25341]**

**Agent: N/A**

Summary: There should be no further encroachment on nine wells as it is a small historical and beautiful natural spring and woodland which will be spoilt by this development. It is used by dog walkers and other walkers as a place of peace and tranquility. It has already been encroached but this needs to stop where the current developments are.

Change To Plan: There needs to remain a large area of fields between the biocampus development / addenbrookes hospital and nine wells to retain its natural tranquility

Legally Compliant?: Yes

Full Reference: O - 65372 - 25341 - PM/SC/8/A - iv

## 65374 Object

**Respondent: Peter Blythe [25344]**

**Agent: N/A**

Summary: Extension of development area to within 30m of Nine Wells nature reserve is wholly inappropriate

Change To Plan: Permission for this extension to be refused

Legally Compliant?: Yes

Full Reference: O - 65374 - 25344 - PM/SC/8/A - ii

## 65382 Object

**Respondent: Rustat Road Neighbourhood Association (Mr Roger Crabtree) [16745]**

**Agent: N/A**

Summary: As previously stated in objecting to PM/SC/02, we are strongly opposed to this proposed extension of employments land into the green belt. The 9 Wells Nature Reserve is not only special in terms of wildlife, it is of considerable historic interest. This encroachment into the Green belt is in conflict with the agreed policy on Green Belt and we can not see any valid reason why this change should go ahead.

Change To Plan: no incursions into greenBelt land here; build up within the existing campus

Legally Compliant?: No

Full Reference: O - 65382 - 16745 - PM/SC/8/A - ii

## 65383 Object

**Respondent: Mr Aidan Van de Weyer [21188]**

**Agent: N/A**

Summary: This modification would threaten Nine Wells LNR and the area around it:  
- the quality and flow of the springs that feed the chalk stream and Hobson's conduit  
- the habitat of the springs that supports rare flatworms and flies  
- the intensification of the recreational use of the LNR  
- the habitats of Nine Wells and the surrounding fields and hedges that support significant numbers of field birds  
There has not been enough work done to be able to adequately assess the degree of this harm.  
The Green Belt study requires a buffer of Green Belt to be retained. This policy does not do this.

Change To Plan: I would like the proposed modification to be removed from the submitted draft.

Legally Compliant?: No

Full Reference: O - 65383 - 21188 - PM/SC/8/A - i, ii, iii, iv

## 65419 Object

**Respondent: Pigeon Land & LIH [25320]**

**Agent: CODE Development Planners Ltd (Ms Karen Beech) [25295]**

Summary: 1. Land south of CBC is provisionally allocated for employment but we are unable to find any evidence to explain the exceptional circumstances justifying the release of this land from the Green Belt.  
2. Further investigation will be required and we look forward to reviewing the results of the council's further consideration of the delivery and sustainability of the provisional allocation on the CBC extension.  
3. The provisional allocation of land to the south of CBC is not sufficient to meet the needs of the bio-medical and healthcare life sciences research needing to be located in close proximity to CBC and Addenbrooke's.

Relevant sections of attached document:

Executive summary, Section 1 - Introduction - para 1.1 to 1.6, Section 6 - Provisional Allocation of Land for CBC Extension, Section 7 - Conclusions - para 7.1 to 7.6, Appendix 1, Appendix 5.

Change To Plan: A proper assessment to be undertaken of employment land requirements, supply and delivery for the specific employment sector of bio-medical, healthcare and life sciences requiring a location in close proximity to CBC and Addenbrooke's Hospital and the allocation of more land, such as Cambridge South, for medical based R&D employment use close to CBC and Addenbrooke's Hospital.

Legally Compliant?: Yes

Full Reference: O - 65419 - 25320 - PM/SC/8/A - i, ii, iii, iv

## 65433 Object

**Respondent: Professor Ian Hodge [25359]**

**Agent: N/A**

Summary: I object to the removal of land from the Green Belt under policy E/1B. The plan should instead better protect Nine Wells LNR from developments on the Campus.

The area currently provides public access by rights of way and through permissive paths. These routes are important in providing amenity value in the Green Belt. The Policy would significantly reduce access to the Green Belt

The Policy will not 'create' an attractive landscaped edge, an appropriate setting for Nine Wells or high quality public realm and open space. These would be better served by leaving land in the Green Belt.

Change To Plan:

Land should be retained in Green Belt and buffer should be strengthened between Campus and Nine Wells LNR.

Legally Compliant?: Yes

Full Reference: O - 65433 - 25359 - PM/SC/8/A - i, ii, iii, iv

## 65445 Object

**Respondent: H Harwood [17683]**

**Agent: N/A**

Summary: 1. It is not sustainable development  
2. Risk of damage to Nine Wells site  
3. Value of Nine Wells site as a wildlife area and local resource  
4. Danger of setting a precedent for further release of green belt land in Gt Shelford

Change To Plan: I would like to see the proposal to release this piece of land removed from the plan.

Legally Compliant?: Yes

Full Reference: O - 65445 - 17683 - PM/SC/8/A - ii, iv

## 65449 Object

**Respondent: David Brown [25332]**

**Agent: N/A**

Summary: This site linked to the historic Hobsons Conduit should be protected from encroaching unsympathetic development.

Change To Plan: The buffer field is retained, free of hospital development, as a natural and historic resource.

Legally Compliant?: Yes

Full Reference: O - 65449 - 25332 - PM/SC/8/A - ii

## 65489 Object

**Respondent: Mr Stephen Tomkins [3569]**

**Agent: N/A**

Summary: The Green Belt MUST be conserved.

Nine Wells and its surrounds should be honoured and restored as an extensive and open public recreational space.

Unsustainable water abstraction is the cause of Nine Wells drying up, not droughts.

Don't build in the flood plain!

Change To Plan: See my objections.

Legally Compliant?: No

Full Reference: O - 65489 - 3569 - PM/SC/8/A - i, ii, iii, iv

## 65513 Object

**Respondent: Mr Paul Cutmore [25244]**

**Agent: N/A**

Summary: Summary. The Biomedical Campus Extension is not justified and would result in significant additional loss of greenbelt in the area, countryside footpath urbanisation, negative impact on Nine Wells SSSI and excuse for further extensions outside the City boundary. There is no evidence to justify the extension.

Change To Plan: The Biomedical Campus needs to justify any extension request. Options should be examined including best usage of existing developed areas.

Legally Compliant?: No

Full Reference: O - 65513 - 25244 - PM/SC/8/A - ii

## 65539 Object

**Respondent: Stapleford Environment Group (Linda Whitebread ) [17922]**

**Agent: N/A**

Summary: 1) Clear breach of obvious border for original Addenbrooke's 2020 plan. Would make it easier for other developers to argue for further breaches of green belt.  
2) Nine Wells valuable chalk springs. Development within 200m risks contamination of aquifer, especially during construction. SUDs cannot prevent future risk.  
3) Nine Wells designated SSSI, requires special protection.  
4) Nine Wells - footfall leading to degradation of vegetation. Risk that agreed expansion of CBC as far as City Boundary will further increase footfall. Does need to be space for people to walk in green space at breaks from work, but extra footfall within special nature reserve would lead to unwelcome degradation.

Change To Plan: Delete modification.

Legally Compliant?: Not Specified

Full Reference: O - 65539 - 17922 - PM/SC/8/A - ii

## 65582 Object

**Respondent: Great Shelford Parish Council (Mrs Bridget Hodge) [12740]**

**Agent: N/A**

Summary: The site is part of a countryside enhancement strategy in the Southern Fringe Area Action Plan and the policies in this plan should be adhered to. Great Shelford wished to see this land as part of an extension to Nine Wells in their Village Design Statement.  
Local residents place a high value on the historic, ecological and recreational value of Nine Wells and the surrounding landscape. The proposal will reduce the opportunities for enjoyable recreational walking and set a precedent for further development into the green belt.

Change To Plan: We therefore believe that this site should form part of a countryside enhancement strategy and not released for development

Legally Compliant?: Yes

Full Reference: O - 65582 - 12740 - PM/SC/8/A - ii

## 65611 Object

**Respondent: Cambridge University Hospitals NHS Foundation Trust [1981]**

**Agent: Barton Willmore (Miss Nichola Traverse-Healy) [15924]**

Summary: CUH are reviewing the strategy for managing the hospitals energy requirements, but remain committed to the development of an energy centre in the future.

CUH have serious concerns about the wording on Policy E/1B and in particular the expectation that the new facility will supply energy to the Cambridge Biomedical Campus. The modifications imply it will be built, and will provide energy for the Campus as whole.

CUH wish to retain flexibility over the new facility. Given the costs involved, feasibility and viability are key issues which will dictate whether other users of the Biomedical Campus are able to connect with the EIC.

Change To Plan: CUH therefore seek greater flexibility in the supporting text. The following wording is therefore suggested to replace paragraph 5.

"Addenbrooke's Hospital aim in the future to develop a new clinical waste facility (energy from waste) to replace an existing facility. Developments within the Cambridge Medical Campus should therefore seek to connect to this energy network, subject to feasibility and viability".

Legally Compliant?: Not Specified

Full Reference: O - 65611 - 1981 - PM/SC/8/A - None

## 65650 Object

**Respondent: Hills Road Residents Association (Wendy Blythe) [25392]**

**Agent: N/A**

Summary: Impact on valuable city amenity and water source also historical City landmark - Hobson's Conduit.

Impact on view from Gogs and City setting

Not agreed in Local Plan consultations does not relate to housing provision

Cambridge does not lack 'employment' opportunities.

Hills Road residents like Trumpington have already lost green infrastructure as a result of Bio-Medical Campus expansion

Removes important 'buffer' field and as result impacts on wildlife and amenity.

Change To Plan: Proposed extension to be rejected and buffer green belt next to Nine Wells Nature Reserve to be maintained.

Legally Compliant?: Yes

Full Reference: O - 65650 - 25392 - PM/SC/8/A - ii

## 65664 Object

**Respondent: Mrs Jeni Sawford [21157]**

**Agent: N/A**

Summary: There is no immediate demand for this piece of land, and it would damage the wildlife in Nine Wells. Political moves to assuage government planners should not be part of solid and effective Local Plans. Decisions should be made in the best interests of the local community and area, which this is not.

Change To Plan: To remove this section of the Green Belt from the development allocation in the Local Plan.

Legally Compliant?: No

Full Reference: O - 65664 - 21157 - PM/SC/8/A - i, ii

**65665 Object**                      **Respondent: Stapleford Parish Council (Ms Rebecca Whitehouse) [1958]**                      **Agent: N/A**

Summary: Strongly object. Breaches original boundary in Addenbrooke's 2020 plan, creeping into green belt. Sets precedent for speculative developers.

Nine Wells site - 13th century iconic landmark under severe threat. Unbroken source of unpolluted water from underlying chalk springs.

30m gap between 'edge of development' and corner of nature reserve - potential pollution of the freshwater chalk springs.

Contamination of run-off water from this extended site would be a source of pollution to the underground water reserves.

Nearby 'genetic theme' cycle path 'inadequate'. CBC development could be threat to its possible enlargement to cater for the increasing number of cyclists.

Strong argument for resisting this speculative application which demonstrates the importance of an impervious green belt separating the City and its necklace villages to prevent urban sprawl.

Change To Plan:

Legally Compliant?: Not Specified

Full Reference: O - 65665 - 1958 - PM/SC/8/A - None

**65667 Object**                      **Respondent: Miranda Fyfe [24135]**                      **Agent: N/A**

Summary: - Loss of a valuable off-road horse riding route.

- Over-provision of employment facilities on an already very busy site: undue pressure on transport and travel arrangements.

- Risk to important wildlife site at Nine Wells from loss of Green belt cushion.

Change To Plan: I would like this extra strip of proposed employment land to be completely removed from the revised plan, and the Green Belt edge as it is currently assured for future iterations. The existing path on the edge of CBC land, including the grassy strip along the side, should be protected and maintained.

If this extra wedge of employment land is allowed to go ahead, then I would like the planners to ensure that good quality grassy tracks for horse-riders are provided around the edge of the expanded CBC site.

A commitment to maintain and improve the existing network of bridleways, and preferably to work with local BHS representatives to upgrade the network and add additional routes, would be a very welcome outcome, whichever way the final decision on this Local Plan revision goes.

Legally Compliant?: No

Full Reference: O - 65667 - 24135 - PM/SC/8/A - i, ii, iii, iv

**65672 Object**                      **Respondent: Martin Goldman [25385]**                      **Agent: N/A**

Summary: Local plan claims no overall shortage of employment land within South Cambridgeshire.

Air quality already among the most harmful in Europe.

Increase to our gridlock.

Water run-off rates into local rivers suggests we should be going the other way.

Increasing built-up sprawl to further encroach upon existing countryside and further damage the historic setting of Cambridge's original freshwater source.

Extended CBC to overbear the ignored east-west public footpath from Granhams Road or hospital site.

Skylark, kingfisher, egret, phalarope, numerous other songbirds, and a colony of hares populates the White Hill. Valuable recreational and educative idyll to be devalued.

Change To Plan: Create biomedical research facilities elsewhere.

Legally Compliant?: No

Full Reference: O - 65672 - 25385 - PM/SC/8/A - i, ii, iii, iv

65674 Object

Respondent: Richard Taylor [25398]

Agent: N/A

Summary: Proposed release of green belt land to enable an extension to Cambridge Biomedical Campus risks too great a negative impact on the immediate surroundings of Nine Wells wood/enclosure which is a historical site of significant local importance. Nine Wells is a special and unique area of great value to the city.

Exploring the area gives residents a chance to directly observe a fascinating element of the city's history. Further development next to the site risks detracting significantly from the currently magical experience of visiting it.

Rather than rely on landscaping requirements I would rather see the green belt protections remain.

Green belt protections should be retained in immediate vicinity of Nine Wells wood/enclosure.

Change To Plan:

Legally Compliant?: Not Specified

Full Reference: O - 65674 - 25398 - PM/SC/8/A - None

65681 Object

Respondent: Dr Fenella Wrigley [21474]

Agent: N/A

Summary: Object strongly.

The new site will encroach within 30 metres of the Nine Wells Local Nature Reserve and remove the Green Belt Buffer designed to protect it. The Reserve is geologically interesting, unique and an important historic site of the natural springs which are the source of Hobsons Conduit.

There is no justification in allowing Cambridge Biomedical Campus to expand further. Other similar sites around Cambridge should be investigated.

Significant harm will caused to the natural environment.  
The site will have a serious impact on the natural habitat, cause a loss of species (grey partridge, skylarks and other farmland birds) and degradation and loss of biodiversity.

Change To Plan:

Legally Compliant?: Not Specified

Full Reference: O - 65681 - 21474 - PM/SC/8/A - None

65718 Object

Respondent: Jim Chisholm [18592]

Agent: N/A

Summary: Breach of obvious border for original Addenbrooke's 2020 plan. making it easier for developers to argue for further breaches between CBC site and Shelford, either side of the railway.

Nine Wells is valuable set of clear springs. Development within 200m risks contamination, especially during construction, even Sustainable Urban Drainage plans cannot prevent risk given changing climate.

Designated a Local Nature Reserve Nine Wells requires special protection (see: [https://en.wikipedia.org/wiki/Nine\\_Wells](https://en.wikipedia.org/wiki/Nine_Wells))

Already suffering from degradation of vegetation. Expansion of CBC would increase footfall causing further unwelcome degradation.

If further space is required locally, use of Spicers brownfield warehousing site could be more appropriate.

Much used cycle/ walking path would be swallowed into development no longer being a pleasant 'motor traffic free path'

Change To Plan: Remove modification

Legally Compliant?: Not Specified

Full Reference: O - 65718 - 18592 - PM/SC/8/A - ii, iii, iv



## 65720 Object

**Respondent: David Blake [25352]**

**Agent: N/A**

Summary: Building on land within 30 metres of a nature reserve is unsustainable.

Change To Plan:

This modification to the plan should be deleted in its entirety, and all additional modifications relevant to this location should also be removed (e.g. PM/SC/2/P, PM/SC/8/A, PM/SC/8/B, PM/SC/3/F).

Legally Compliant?: Not Specified

Full Reference: O - 65720 - 25352 - PM/SC/8/A - None

## 65725 Object

**Respondent: Professor Ian Hodge [25359]**

**Agent: N/A**

Summary: Removal of Green Belt land to extend Biomedical Campus would undermine value of Nine Wells. There are few areas of semi-natural habitats, they should be protected and enhanced. Rather than change this land to urban use protect by adding a buffer between site and existing development such as by extending existing tree planting to reinforce the separation, consistent with adopted guidance.

Area provides important amenity value through rights of way/permissive access. Development of the land as proposed would damage this value. How would loss be mitigated?

Extraordinary to suggest removing from Green Belt can 'create' attractive landscaped edge; appropriate setting; high quality public realm and open space. Objectives better served by leaving in Green Belt and enhancing biodiversity and amenity values.

Change To Plan:

Legally Compliant?: Not Specified

Full Reference: O - 65725 - 25359 - PM/SC/8/A - None

## 65732 Object

**Respondent: Jenny Blackhurst [25437]**

**Agent: N/A**

Summary: Modification inconsistent with proposed modification PP/CC/2E, which concludes it's unlikely additional development could be accommodated on the edge of the City without substantial harm to Green Belt. Also internally inconsistent. Text states, "The Council considers that the need for jobs can comprise exceptional circumstances justifying a review of the Green Belt so far as this would not cause significant harm to Green Belt purposes." [What's the difference between "substantial" harm and "significant" harm?] Text makes clear no need for employment land, " Whilst there is no overall shortage of employment land within South Cambridgeshire for high-tech and research and development companies and organisations..." If no need your argument, this might create justification for reviewing the Green Belt as long as it doesn't cause significant harm to the Green Belt, is doubly irrelevant.

Change To Plan:

Legally Compliant?: Not Specified

Full Reference: O - 65732 - 25437 - PM/SC/8/A - iii

## 65750 Object

**Respondent: County Cllr Tony Orgee [1461]**

**Agent: N/A**

Summary: I do not support the allocation of site E/1b, south of Addenbrookes as a site for new employment land.

I oppose this for the following reasons:

It is in the Green Belt and , in my view, land should only be released from the Green Belt in the most exceptional of circumstances;

There was little or no justification put forward to remove this land from the Green Belt;

I understand that at least a part of the site is subject to flooding;

There is a potential impact on the important Nine wells site.

Change To Plan:

Legally Compliant?: Not Specified

Full Reference: O - 65750 - 1461 - PM/SC/8/A - None

## 65760 Object

**Respondent:** Save Nine Wells Local Nature Reserve Campaign (Mr Aiden Van de Weyer) [25448]

**Agent:** N/A

Summary: Petition for the Save Nine Wells Local Natural Reserve.

Number of signatories: 435.

We object to the addition of new policy E/1 B (modification number PM/SC/8/ A) to the South Cambridgeshire Local Plan which removes a field close to the Nine Wells nature reserve from the Green Belt and include it in the Cambridge Biomedical Campus employment area.

We believe that there is no justification for this modification and that it will cause huge harm to the ecology of Nine Wells and the surrounding land.

Change To Plan:

Legally Compliant?: Not Specified

Full Reference: O - 65760 - 25448 - PM/SC/8/A - None

## 65824 Object

**Respondent:** Mr Michael J. Antcliff [25452]

**Agent:** N/A

Summary: I am writing to protest most strongly against the proposed site for the Biomedical Centre so close to the Nine Wells site and which will gobble up a fair amount of the Green Belt. I strongly believe that this area of the Green Belt must be preserved.

Nine Wells I know well and is an oasis for many different species of wildlife that should be protected.

I sincerely hope that as a Council you will resist the developers' advances and expect that you will ensure the protection of Nine Wells and the Green Belt.

Change To Plan: Delete modification

Legally Compliant?: Not Specified

Full Reference: O - 65824 - 25452 - PM/SC/8/A - None

## 65847 Object

**Respondent:** Dr. Gail Kenney [20833]

**Agent:** N/A

Summary: I am very much against any further development of the Green Belt on or around the Addenbrookes Site. The site is already overdeveloped . The necklace villages want to stay villages with a very different character to suburbia, and should be allowed to do so. It is sheer greed to demand more land in addition to all the land already taken from the previous green belt without even a proper reason for wanting the land. The roads are already absolutely chock a block with traffic and not only at rush hour. This area will not stand more development.

Change To Plan:

Legally Compliant?: Not Specified

Full Reference: O - 65847 - 20833 - PM/SC/8/A - None

## 65889 Object

**Respondent:** Mr John Williams [721]

**Agent:** N/A

Summary: I respond to oppose the extension of the Cambridge Biomedical Campus as per new policy PM/SC/8/A. I oppose this policy on the grounds that the Cambridge Inner Green Belt Boundary Study (November 2015) did not consider the impact of this extension on the Nine Wells Nature Reserve within paragraph 109 of the National Planning Policy Framework

Change To Plan:

Legally Compliant?: Not Specified

Full Reference: O - 65889 - 721 - PM/SC/8/A - None

## 65942 Object

**Respondent: Cambridge Past Present and Future (Ms Stacey Weiser) [20942]**

**Agent: N/A**

Summary: Public concern has been raised about the impact on the Nine Wells County Nature Reserve. The following sentence should be added to Paragraph 2b: 'Development should promote the restoration of the degraded freshwater ecology, and the maintenance of the reserve in an enhanced ecological status'.

Change To Plan:

Legally Compliant?: Not Specified

Full Reference: O - 65942 - 20942 - PM/SC/8/A - None

## 65968 Object

**Respondent: Natural England (Ms Gail Hopkins) [25046]**

**Agent: N/A**

Summary: We have no objection to this new policy which requires provision of an appropriate landscaped setting for the Nine Wells Local Nature Reserve and provision of pedestrian access to the Reserve whilst mitigating visitor impacts. The policy also requires development to demonstrate and ensure that there will be no material impact on the volume, pattern of flow or water quality of the chalk springs at Nine Wells.

Natural England advises that in addition to landscape enhancements the policy should include requirements to incorporate biodiversity enhancements including contribution to the targets and objectives of the Nine Wells Nature Reserve.

Change To Plan: The policy should include requirements to incorporate biodiversity enhancements including contribution to the targets and objectives of the Nine Wells Nature Reserve.

Legally Compliant?: Not Specified

Full Reference: O - 65968 - 25046 - PM/SC/8/A - None

## 65971 Object

**Respondent: Shelford and District Bridleways Group (Mrs Sarah Taylor) [25408]**

**Agent: N/A**

Summary: Object to the proposals to extend the Cambridge Biomedical Campus. This proposed extension into the Green Belt does not retain the existing permissive network of bridleways that cross this area. These bridleways are heavily used not only by horse riders but also by pedestrians, dog walkers and cyclists. They also provide essential links to other routes.

Expect any modification minimally to retain or provide equivalent bridleways, but optimally to upgrade them to ensure all have grass tracks and hard surfaces in order to provide facilities for all user groups throughout the year. The British Horse Society and local user groups would be happy to assist in the design of these routes.

Change To Plan:

Legally Compliant?: Not Specified

Full Reference: O - 65971 - 25408 - PM/SC/8/A - None

## 66071 Object

**Respondent: South Cambridgeshire Green Party (Miss Eleanor Crane) [25357]**

**Agent: N/A**

Summary: Proposed development of Cambridge Biomedical Campus:  
\* The proposed development at Cambridge Biomedical Campus would create a harmful precedent for breaching the Green Belt;  
\* The proposals put the Nine Wells SSSI at risk of aquifer contamination and damage to vegetation from increased footfall.

Change To Plan:

Legally Compliant?: Not Specified

Full Reference: O - 66071 - 25357 - PM/SC/8/A - None

## 66210 Object

**Respondent: Cllr Ben Shelton [17822]**

**Agent: N/A**

Summary: I would like to record my opposition to the planned removal of land on the Biotechnology research and development site at Addenbrookes Hospital. The land is in the setting of historic location of Nine Wells which supply's and has supplied Hobson's chose for many years. And is a part of Cambridge heritage. This will also be subject to surface flooding to develop this area would increase the risks of surface flooding in the Shelford area.

Change To Plan:

Legally Compliant?: Not Specified

Full Reference: O - 66210 - 17822 - PM/SC/8/A - None

66228 Object

Respondent: Cllr Charles Nightingale [25492] Agent: N/A

Summary: I would like to record my opposition to the planned removal of land on the Biotechnology research and development site at Addenbrookes Hospital. The land is in the setting of historic location of Nine Wells which supply's and has supplied Hobson's chose for many years. And is a part of Cambridge heritage. This will also be subject to surface flooding to develop this area would increase the risks of surface flooding in the Shelford area.

Change To Plan:

Legally Compliant?: Not Specified

Full Reference: O - 66228 - 25492 - PM/SC/8/A - None

66233 Object

Respondent: Ms Stonley [25494] Agent: N/A

Summary: I object strongly to the development proposed on our fields near and adjacent to NINE WELLS. "Nine Wells" is an important site near Cambridge; the small area is a place of peace and tranquility, home to many different species of birds and animals and also the source of water for Cambridge historically and still used to this day.

Change To Plan:

Legally Compliant?: Not Specified

Full Reference: O - 66233 - 25494 - PM/SC/8/A - None

65166 Support

Respondent: Mr mike roe [4100] Agent: N/A

Summary: Support.

Change To Plan:

Legally Compliant?: Not Specified

Full Reference: S - 65166 - 4100 - PM/SC/8/A - None

65180 Support

Respondent: Duncan Stott [25284] Agent: N/A

Summary: Biomedical research is of great benefit to both our local economy and humanity in general. Cambridge has the opportunity to become a world leader in STEM disciplines and it is crucial that planning policy embraces the city's potential. It is sound to adjust the green belt as necessary to provide the most appropriate sites for employment and housing throughout the local area.

Change To Plan:

Legally Compliant?: Not Specified

Full Reference: S - 65180 - 25284 - PM/SC/8/A - None

65241 Support

Respondent: Chancellor, Masters and Scholars of the Univ. of Cambridge (Mr Paul Milliner) [3081] Agent: Chancellor, Masters and Scholars of the Univ. of Cambridge (Mr Paul Milliner) [3081]

Summary: With so little land now available at the Campus, the University supports the provisional modification to release land from the Green Belt to enable further expansion.

The additional allocation of land to meet the future development needs of the life sciences sector is helpful, but the scale of the allocation (8.91ha) is unlikely to be sufficient for the plan period to 2031. More still needs to be done to plan for the development needs of the sector on the south side of Cambridge, close to the Biomedical Campus.

Change To Plan:

Legally Compliant?: Not Specified

Full Reference: S - 65241 - 3081 - PM/SC/8/A - None

65275 Support

Respondent: Mr Tim Cribb [25153] Agent: N/A

Summary: Provided the conditions specified are properly met I see no harm to the Springs or adjacent area.

Change To Plan:

Legally Compliant?: Not Specified

Full Reference: S - 65275 - 25153 - PM/SC/8/A - None

**65302 Support**      **Respondent:** Campaign to Protect Rural England (CPRE) (Miss Shirley Fieldhouse)      **Agent:** N/A  
[17302]

Summary: While CPRE does not object to the provision of appropriate landscape setting for the Nine Wells Local Nature Reserve, we wish to see the addition of the condition that the land is safeguarded for future development rather than allocated.

Change To Plan:

Legally Compliant?: Not Specified

Full Reference: S - 65302 - 17302 - PM/SC/8/A - None

**65385 Support**      **Respondent:** Cambridge Network (Claire Ruskin) [25184]      **Agent:** N/A

Summary: This is a sensible allocation of land which will not have significant negative impact and is much needed to develop businesses for collaborative research and development within cycling or walking distance of the Biomedical Campus. See attached letter from Cambridge Network and One Nucleus.

Change To Plan:

Legally Compliant?: Not Specified

Full Reference: S - 65385 - 25184 - PM/SC/8/A - None

**65530 Support**      **Respondent:** mrs Linda Frost [25383]      **Agent:** N/A

Summary: This land is currently cultivated so will be a monoculture of a single crop with pesticides and LOW biodiversity .The proposed landscaping would increase the biodiversity and enhance the appearance of the site .I like the fact that there would be public access to the nine wells site.  
The site should be used for organisations which would genuinely benefit from close collaboration with the other biomedical organisations nearby.  
The plans are environmentally sound and I hope they are successful .

Change To Plan:

Legally Compliant?: Not Specified

Full Reference: S - 65530 - 25383 - PM/SC/8/A - None

**65589 Support**      **Respondent:** Anglian Water Services Limited (Sue Bull) [15648]      **Agent:** N/A

Summary: Please find attached RAG sheet summarising our views on serving the sites revised and included in the modifications.  
[Spreadsheet shows an overall RAG rating of Amber - Infrastructure and/or treatment upgrades required to serve proposed growth or diversion of assets may be required]

Change To Plan:

Legally Compliant?: Not Specified

Full Reference: S - 65589 - 15648 - PM/SC/8/A - None

**65723 Support**      **Respondent:** Countryside Properties Plc (Mr Andrew Carrington) [25430]      **Agent:** N/A

Summary: The Cambridge Biomedical Campus is internationally recognised as a centre of excellence in clinical care, medical research and treatment. Following the successful phase 1 expansion which will be home to the MRC's Laboratory of Molecular Biology, Papworth Hospital and Astra Zeneca proposals are already at an advanced stage for the phase 2 expansion. In order to ensure that this centre of excellence can continue to thrive, the proposal to allocate additional land to facilitate this is therefore supported.

Countryside Properties and Liberty Property are the joint developers of Phase 1 and Phase 2 of the Cambridge Biomedical Campus.

Change To Plan:

Legally Compliant?: Not Specified

Full Reference: S - 65723 - 25430 - PM/SC/8/A - None

## 65724 Support

**Respondent: Liberty Property Trust (Mr Andrew Belvins) [25434]**

**Agent: N/A**

Summary: The Cambridge Biomedical Campus is internationally recognised as a centre of excellence in clinical care, medical research and treatment. Following the successful phase 1 expansion which will be home to the MRC's Laboratory of Molecular Biology, Papworth Hospital and Astra Zeneca proposals are already at an advanced stage for the phase 2 expansion. In order to ensure that this centre of excellence can continue to thrive, the proposal to allocate additional land to facilitate this is therefore supported.

Countryside Properties and Liberty Property are the joint developers of Phase 1 and Phase 2 of the Cambridge Biomedical Campus.

Change To Plan:

Legally Compliant?: Not Specified

Full Reference: S - 65724 - 25434 - PM/SC/8/A - None

## 65741 Support

**Respondent: Cambridge University Health Partners (Dr Hans Hagen) [25440]**

**Agent: N/A**

Summary: We strongly support this modification which will provide much needed space at CBC for expansion of life science research.

Change To Plan: We propose an amendment to the Modification to include provisions for additional sites for R&D and for housing adjacent to or allowing ease of access to the CBC as a major centre of employment and an important part of the wider Cambridge R&D ecosystem.

Legally Compliant?: Not Specified

Full Reference: S - 65741 - 25440 - PM/SC/8/A - None

## 65792 Support

**Respondent: Historic England (Mr David Grech) [23622]**

**Agent: N/A**

Summary: In respect of Housing Land Supply, Historic England has reviewed the revised housing allocation map (Figure 3.2) prepared by the Councils and again we do not wish to comment in detail on either the New Proposal site in the City or the New Proposal Site in SCDC.

Nor do we object to the main modifications proposed to the South Cambridgeshire Local Plan in respect of the Development Strategy as set out in paragraphs 2.42, 2.43, 2.44, 2.45 and 2.47. We positively support the main modification proposed to the South Cambridgeshire Local Plan in respect of the Development Strategy as set out in paragraph 2.46.

Change To Plan:

Legally Compliant?: Not Specified

Full Reference: S - 65792 - 23622 - PM/SC/8/A - None

## 65962 Support

**Respondent: SmithsonHill (formerly Hinxton Land Ltd) [18002]**

**Agent: Terence O'Rourke (Nick Guildford) [25453]**

Summary: Welcome the acknowledgement by the councils that there is need for additional employment land. These needs cannot always be met on existing science parks, given the need for proximity to existing activities and the importance of clustering. There is significant evidence to demonstrate that the amount of land allocated will not meet the needs of all foreseeable types of economic development.

Land at Hinxton provides a significant opportunity to develop a new mixed-use hub for the agri-tech / food / plant science sector in the centre of the South East Cluster, with exceptional linkages to existing life science and other businesses already located within the cluster. South Cambridgeshire should therefore allocate land at Hinxton for employment related development in the same way that an extension to Cambridge Biomedical Campus has been introduced through the proposed modifications.

Change To Plan:

Legally Compliant?: Not Specified

Full Reference: S - 65962 - 18002 - PM/SC/8/A - None

66087 Support

Respondent: Cambridgeshire County Council - Strategic Assets Team [25478]

Agent: Carter Jonas LLP (Brian Flynn) [17331]

Summary: Support:  
-the proposed site allocation for the proposed uses;  
-specified criteria to guide the form and content of development;  
-need for additional office and R&D space on the edge of Cambridge (accessible by a range of modes of transport);  
-extension of an existing established location (Modification PM/SC/8/A is adjacent to the existing allocation within Cambridge)  
-Inner Green Belt Review 2015 (IGBR 2015) which concludes that the site could be released from the Green Belt.  
We request proposed LP Modifications PM/SC/8/A and PM/SC/8/B are retained and no changes are made except to clarify the findings of surface water drainage assessment.  
Relevant attachments:  
-36873\_FloodRiskConstraints&OpportunitiesReport.pdf  
-Commercial Edge Cambridge - 2014.pdf  
-22 01 16 Cambs County Council - Policy E1B LP Mods Reps Jan 2016.pdf (Paragraphs 1 to 18)

Change To Plan:

Legally Compliant?: Not Specified

Full Reference: S - 66087 - 25478 - PM/SC/8/A - i, ii, iii, iv

66121 Support

Respondent: Cambridge Past Present and Future (Ms Stacey Weiser) [20942]

Agent: N/A

Summary: CambridgePPF welcomes the specific reference to the types of use to be accommodated on the extension site, i.e. Biomedical and Biotechnology research and higher education related and sui-generis medical research institutes. CambridgePPF has concerns that reliance on land owner controls alone are not sufficient to ensure that the site is released and developed for employment purposes that support the Cambridge Cluster, and requests that any company proposing to locate to this, or any other strategic site within the city or its fringe, should demonstrate the essential necessity for its location on this site and what contribution it will make to the Cambridge Cluster.

Change To Plan:

Legally Compliant?: Not Specified

Full Reference: S - 66121 - 20942 - PM/SC/8/A - None

**65131 Object**

**Respondent:** Bridget Smith [17462]

**Agent:** N/A

Summary: No evidence of need for another employment site.

Proximity to Nine Wells Reserve.

Ownership

Change To Plan: I would like it removed from the plan

Legally Compliant?: Yes

Full Reference: O - 65131 - 17462 - PM/SC/8/B - i, ii

**65152 Object**

**Respondent:** Mr John McGill [6118]

**Agent:** N/A

Summary: While appreciating the desire to supply additional employment land, this particular location is inappropriate. Reasons:  
it would cause severe traffic congestion on both major and local roads;  
it would change the fine setting of the landscape;  
it would have a highly negative impact on the Nine Wells reserve;  
it would encourage, and probably lead to, overdevelopment of the Great Shelford area.

Change To Plan: The proposed policy change should be withdrawn.

Legally Compliant?: Yes

Full Reference: O - 65152 - 6118 - PM/SC/8/B - i, iii

**65368 Object**

**Respondent:** Trumpington Residents Association (Andrew Roberts) [5312]

**Agent:** N/A

Summary: The Trumpington Residents' Association objects to the additional text. The Council appears to be attempting to justify the proposed expansion of the Cambridge Biomedical Campus on the basis of a flawed analysis of the Green Belt, without demonstrating the need for additional employment land at this location. In preparing the 2013 Draft Plan, the Council did not attempt to argue that there should be an expansion of the Cambridge Biomedical Campus and it has failed to produced revised figures for employment need in the current consultation. The Council admits in the text that there is no shortage of employment land.

Change To Plan: Deletion of the supporting text for Policy E/1B, concerning development to the south of the Cambridge Biomedical Campus.

Legally Compliant?: Yes

Full Reference: O - 65368 - 5312 - PM/SC/8/B - ii, iii, iv

**65384 Object**

**Respondent:** Rustat Road Neighbourhood Association (Mr Roger Crabtree) [16745]

**Agent:** N/A

Summary: we do not agree with these statements. We consider this extension will significantly harm Green Belt purposes

Change To Plan: the suggested office should be built elsewhere, or by building up on the existing biomedical campus

Legally Compliant?: No

Full Reference: O - 65384 - 16745 - PM/SC/8/B - ii

**65406 Object**

**Respondent:** Helen Robbins [25351]

**Agent:** N/A

Summary: Building up to the Nine Wells boundary will damage this area for ever. It is a vital lung for Cambridge ecologically, environmentally, for nature and the wellbeing of local residents. Once it's gone, it's gone. I object to the proposal in the strongest terms.

Change To Plan: I would like you to reconsider where the Biomedical Campus could expand eg build taller buildings?

Legally Compliant?: No

Full Reference: O - 65406 - 25351 - PM/SC/8/B - i, ii, iii, iv



## 65420 Object

**Respondent: Pigeon Land & LIH [25320]**

**Agent: CODE Development Planners Ltd (Ms Karen Beech) [25295]**

Summary: 1. Land south of CBC is provisionally allocated for employment but we are unable to find any evidence to explain the exceptional circumstances justifying the release of this land from the Green Belt.  
2. Further investigation will be required and we look forward to reviewing the results of the council's further consideration of the delivery and sustainability of the provisional allocation on the CBC extension.  
3. The provisional allocation of land to the south of CBC is not sufficient to meet the needs of the bio-medical and healthcare life sciences research needing to be located in close proximity to CBC and Addenbrooke's.

Relevant sections of attached document:

Executive summary, Section 1 - Introduction - para 1.1 to 1.6, Section 6 - Provisional Allocation of Land for CBC Extension, Section 7 - Conclusions - para 7.1 to 7.6, Appendix 1, Appendix 5.

Change To Plan: A proper assessment to be undertaken of employment land requirements, supply and delivery for the specific employment sector of bio-medical, healthcare and life sciences requiring a location in close proximity to CBC and Addenbrooke's Hospital and the allocation of more land, such as Cambridge South, for medical based R&D employment use close to CBC and Addenbrooke's Hospital

Legally Compliant?: Yes

Full Reference: O - 65420 - 25320 - PM/SC/8/B - ii, iii, iv

## 65452 Object

**Respondent: David Brown [25332]**

**Agent: N/A**

Summary: I accept that the work done on the Addenbrookes campus is very important, but feel that further accommodation for it could be provided by building more densely on the existing allocation of land.

Change To Plan: Denser building on existing site.

Legally Compliant?: Yes

Full Reference: O - 65452 - 25332 - PM/SC/8/B - ii

## 65507 Object

**Respondent: Mr Paul Cutmore [25244]**

**Agent: N/A**

Summary: The Biomedical Campus Extension is not justified and would result in significant additional loss of greenbelt in the area, countryside footpath urbanisation, negative impact on Nine Wells SSSI and excuse for further extensions outside the City boundary. There is no evidence to justify the extension.

Change To Plan: The Biomedical Campus needs to justify any extension request. Options should be examined, including best usage of existing developed areas.

Legally Compliant?: No

Full Reference: O - 65507 - 25244 - PM/SC/8/B - ii

## 65606 Object

**Respondent: Great Shelford Parish Council (Mrs Bridget Hodge) [12740]**

**Agent: N/A**

Summary: Great Shelford Parish Council do not believe SCDC has demonstrated the need for additional jobs on this site and dispute the analysis of the site as put forward in the Green Belt Review and therefore objects to the additional text.

Change To Plan: We therefore believe that this site should form part of a countryside enhancement strategy and not be released for development

Legally Compliant?: Yes

Full Reference: O - 65606 - 12740 - PM/SC/8/B - ii

## 65721 Object

**Respondent: David Blake [25352]**

**Agent: N/A**

Summary: Building on land within 30 metres of a nature reserve is unsustainable.

Change To Plan:

This modification to the plan should be deleted in its entirety, and all additional modifications relevant to this location should also be removed (e.g. PM/SC/2/P, PM/SC/8/A, PM/SC/8/B, PM/SC/3/F).

Legally Compliant?: Not Specified

Full Reference: O - 65721 - 25352 - PM/SC/8/B - None

66224 Object

Respondent: Federation of Cambridge Residents' Associations (Ms Tania Elliot)  
[25488]

Agent: N/A

Summary: Positioning of the Cambridge Biomedical Campus building near Nine Wells, brought forward by the relocation of Astra Zeneca. I strongly object to the argument that buildings here are acceptable providing they are no taller than Addenbrooke's. Addenbrooke's has a very tall clinical waste tower and the new structure would undoubtedly be extremely detrimental to the view downward towards Cambridge were this height to be matched by the new building. It is also very close to Nine Wells Local Nature Reserve, which the Council recognises to be of major significance. It is known that this source of water is at risk of drying. New building in this location should be avoided, or if needs must that the level of the ground should be lowered to lower its impact.

Change To Plan:

Legally Compliant?: Not Specified

Full Reference: O - 66224 - 25488 - PM/SC/8/B - None

65389 Support

Respondent: Cambridge Network (Claire Ruskin) [25184]

Agent: N/A

Summary: This is a sensible allocation of land which will not have significant negative impact and is much needed to develop businesses for collaborative research and development within cycling or walking distance of the Biomedical Campus. See attached letter from Cambridge Network and One Nucleus.

In addition, support for the consideration of Cambridge South railway station which will enable ease of access and reduction in car congestion getting from the north of Cambridge.

Change To Plan:

Legally Compliant?: Not Specified

Full Reference: S - 65389 - 25184 - PM/SC/8/B - None

65943 Support

Respondent: Cambridge Past Present and Future (Ms Stacey Weiser) [20942]

Agent: N/A

Summary: Support

Change To Plan:

Legally Compliant?: Not Specified

Full Reference: S - 65943 - 20942 - PM/SC/8/B - None

66088 Support

Respondent: Cambridgeshire County Council - Strategic Assets Team [25478]

Agent: Carter Jonas LLP (Brian Flynn) [17331]

Summary: Support:  
-the proposed site allocation for the proposed uses;  
-specified criteria to guide the form and content of development;  
-need for additional office and R&D space on the edge of Cambridge (accessible by a range of modes of transport);  
-extension of an existing established location (Modification PM/SC/8/A is adjacent to the existing allocation within Cambridge)  
-Inner Green Belt Review 2015 (IGBR 2015) which concludes that the site could be released from the Green Belt.  
We request proposed LP Modifications PM/SC/8/A and PM/SC/8/B are retained and no changes are made except to clarify the findings of surface water drainage assessment.  
Relevant attachments:  
-36873\_FloodRiskConstraints&OpportunitiesReport.pdf  
-Commercial Edge Cambridge - 2014.pdf  
-22 01 16 Cambs County Council - Policy E1B LP Mods Reps Jan 2016.pdf (Paragraphs 1 to 18)

Change To Plan:

Legally Compliant?: Not Specified

Full Reference: S - 66088 - 25478 - PM/SC/8/B - i, ii, iii, iv

**66095 Support**

**Respondent:** Ely Diocesan Board of Finance [3062]

**Agent:** Carter Jonas LLP (Brian Flynn) [17331]

Summary: Relevant sections of attached document: Paragraphs 27-29.

Agree with the modification and think that this modification should also apply to sites such as the EDBF land - sites 1 and 2.

Change To Plan: No changes to modification

Legally Compliant?: Not Specified

Full Reference: S - 66095 - 3062 - PM/SC/8/B - i, ii, iii, iv

**66021 Object**

**Respondent: Commercial Estates Group [17653]**

**Agent: Nathaniel Lichfield & Partners (Mr Matthew Spry) [20555]**

Summary: For the reasons set out in detail in Green Belt Review Technical Paper (Appendix 3) which accompanies this representation and forms part of it, the conclusion in relation to land east of Peterhouse Technology Park (E/2) and proposed alteration to allocation are fundamentally flawed.

Council's approach to defining boundaries which fail to provide clear and recognisable boundaries based on readily recognisable physical features which are likely to be permanent (NPPF para 85).

Relevant Attachment  
Cambridge South East 1.4 Section 2(b) - Green Belt (2.14-2.31)  
and Appendix 3 (Green Belt)

As a minimum, proposed allocation E/2 must be reinstated to its original extent and this modification to text amended accordingly.

Change To Plan: Amend modification

Legally Compliant?: Not Specified

Full Reference: O - 66021 - 17653 - PM/SC/8/C - i, ii, iii, iv

**65587 Support**

**Respondent: Anglian Water Services Limited (Sue Bull) [15648]**

**Agent: N/A**

Summary: Please find attached RAG sheet summarising our views on serving the sites revised and included in the modifications.  
[Spreadsheet shows an overall RAG rating of Amber - Infrastructure and/or treatment upgrades required to serve proposed growth or diversion of assets may be required]

Change To Plan:

Legally Compliant?: Not Specified

Full Reference: S - 65587 - 15648 - PM/SC/8/C - None

**65659 Support**

**Respondent: Cambridge Network (Claire Ruskin) [25184]**

**Agent: N/A**

Summary: Cambridge Network supports the principle of allocations at South East Cambridge for housing at Worts Causeway and the economic development via extensions to Peterhouse Technology Park in Policy E/2 of the South Cambridgeshire Plan. We support more housing of a reasonably affordable type within walking/cycling distance. Employees are reluctant to fill vacancies in Cambridge if they can't afford housing without creating congestion. Both the residential and economic development components represent a responsible approach to growth, in locations that are demonstrably sustainable and in line with the longstanding Development Strategy underpinning the Plans. May need more space not less.

Change To Plan:

Legally Compliant?: Not Specified

Full Reference: S - 65659 - 25184 - PM/SC/8/C - None

**65679 Support**

**Respondent: Mr Robert Culshaw [8609]**

**Agent: N/A**

Summary: I repeat my support for MRC status for Fulbourn.

Change To Plan:

Legally Compliant?: Not Specified

Full Reference: S - 65679 - 8609 - PM/SC/8/C - None

## 65793 Support

**Respondent:** Historic England (Mr David Grech) [23622]

**Agent:** N/A

**Summary:** In respect of Housing Land Supply, Historic England has reviewed the revised housing allocation map (Figure 3.2) prepared by the Councils and again we do not wish to comment in detail on either the New Proposal site in the City or the New Proposal Site in SCDC.

Nor do we object to the main modifications proposed to the South Cambridgeshire Local Plan in respect of the Development Strategy as set out in paragraphs 2.42, 2.43, 2.44, 2.45 and 2.47. We positively support the main modification proposed to the South Cambridgeshire Local Plan in respect of the Development Strategy as set out in paragraph 2.46.

**Change To Plan:**

**Legally Compliant?:** Not Specified

**Full Reference:** S - 65793 - 23622 - PM/SC/8/C - None

## 65944 Support

**Respondent:** Cambridge Past Present and Future (Ms Stacey Weiser) [20942]

**Agent:** N/A

**Summary:** Support

**Change To Plan:**

**Legally Compliant?:** Not Specified

**Full Reference:** S - 65944 - 20942 - PM/SC/8/C - None

**CHAPTER:** Appendix C: Proposed main PM/SC/8/D  
modifications to the Submission

## 65122 Object

**Respondent:** Dr Roger Sewell [25099]

**Agent:** N/A

**Summary:** Employment at settlements outside Cambridge needs to be vigorously encouraged in order to reduce the amount of travelling into Cambridge that is needed. The ministerial statement, in so far as it gives any blanket provision to turn employment sites in settlements outside Cambridge into residential sites, needs to be resisted (the opposite applies to employment sites inside Cambridge).

**Change To Plan:** Reasoning should be added to the effect indicated in my comment.

**Legally Compliant?:** Yes

**Full Reference:** O - 65122 - 25099 - PM/SC/8/D - ii

## 65772 Object

**Respondent:** Mr Tony Russell [6353]

**Agent:** N/A

**Summary:** Infill using Industrial sites (re-locating businesses nearer main roads rather than brown land:

- 1) Major problem with roads is pot holes, this would reduce damage due to fewer lorries and goods vehicles.
- 2) Safety, fewer lorries, vans and cars using villages and their roads would make roads safer for cyclists, children crossing roads etc.
- 3) Quicker turn-arounds for commercial vehicles, better productivity.
- 4) Easier for people to get to and from work.

Years ago it was necessary for Industrial Estates to be in villages, due to most people not having cars, so they needed to be close in order to bike or walk. Now most people travel to work in cars, many going through villages.

**Change To Plan:**

**Legally Compliant?:** Not Specified

**Full Reference:** O - 65772 - 6353 - PM/SC/8/D - None

**65237 Object**                      **Respondent: Mrs Katie Lucas [25305]**                      **Agent: N/A**

Summary: I feel this section simply isn't strong enough. Development should be halted until transport systems can handle CURRENT traffic levels.

If housing developers are not willing to contribute to large capital projects -- such as the A14 widening -- they should not get planning permission.

In the last decade we have been promised A14 widening to Fen Ditton, A14 widening to the A1 junction, A10 improvement, Kings Cross-Kings Lynn rail line doubling, Ely bottleneck removal, Cambridge Station crossover bottleneck removals, Kings-Lynn service frequency increase.

Change To Plan: Development must be made conditional on road transit times being reduced and objectively, independently verified improvements in public transport provision.

There should be no development at Ely until rail service frequency is increased. There should be no development at Waterbeach until rail service frequency and capacity is increased.

There should be no development in Cambridge until road journey times are improved.

Legally Compliant?: Yes

Full Reference: O - 65237 - 25305 - PM/SC/10/A - iii, iv

**65432 Object**                      **Respondent: Mr Ian Hildrew [23247]**                      **Agent: N/A**

Summary: The evidence of Cambourne to date is that most journeys are at odds with the Transport Infrastructure plans. Employment sites are not local and there is a great deal of traffic to London via Royston and St Neots railway stations, as well as to sites in Cambridge not easily reached by public transport. A busway to Madingley P&R will not change this as new employment centres are to the south of Cambridge.

Change To Plan: All building should contribute and none should be exempt from planning practice guidance

SCDC and the City Council should get real, and Plan. Asking anyone who has land they would like to build on to get in touch, and then to build a long term plan on that basis is not Planning.

Legally Compliant?: No

Full Reference: O - 65432 - 23247 - PM/SC/10/A - i, ii, iii, iv

**66075 Support**                      **Respondent: South Cambridgeshire Green Party (Miss Eleanor Crane) [25357]**                      **Agent: N/A**

Summary: We welcome the measures proposed to help those wishing to build their own homes.

We believe that self-builds can play an important role in supplying sufficient affordable and sustainable housing. Two of our members report that in the past they found it unaffordable to build a small eco-house because of the levy that was in place at the time. We therefore welcome the measures proposed to help those wishing to build their own homes (Policy H/8 section 2; Paragraph 7.24; new paragraph after Paragraph 7.27; new paragraph after Paragraph 10.42).

Change To Plan:

Legally Compliant?: Not Specified

Full Reference: S - 66075 - 25357 - PM/SC/10/A - None

**65421 Object**

**Respondent:** Mrs Sally Hildrew [23248]

**Agent:** N/A

Summary: I can see no evidence to show that new development sites are more favourable in terms of sustainability than Cambridge Fringe areas.

Change To Plan: That sites in Cambridge Fringe should be considered in more depth as I believe they are better in terms of sustainability than new developments which are under consideration.

Legally Compliant?: Yes

Full Reference: O - 65421 - 23248 - MM/SC/2/A - ii, iv

**65427 Object**

**Respondent:** Mr Ian Hildrew [23247]

**Agent:** N/A

Summary: the sustainability process is poor when comparing the new developments with the so-called Cambridge fringe developments. There is no evidence that new developments are more favourable in this respect than the Cambridge Fringe.

Change To Plan: The Fringe is closer to employment sites and should be considered for expansion with the possibility of green belt swaps to enable expansion here.

Legally Compliant?: No

Full Reference: O - 65427 - 23247 - MM/SC/2/A - i

**65778 Object**

**Respondent:** Mr Jonathan Burrell [22509]

**Agent:** N/A

Summary: Councils have not compared Bourn Airfield and West Cambourne Sites fairly regarding Sustainability. Environmental sustainability has been mainly tested on each site's effect on Green Belt rather than locality. Tests should be applied equally. Both sites would bring urban sprawl along A428 with insufficient separation between themselves, Caxton and Caldecote and generate additional traffic detrimental to neighbouring villages. There's no evidence effects have been considered. Will not be self contained are 10 miles from nearest major employment and most commuting likely by car. Improving one bus link will not be enough to mitigate this as Cambridge is only one destination of commuters.

Change To Plan:

Legally Compliant?: Not Specified

Full Reference: O - 65778 - 22509 - MM/SC/2/A - i, ii, iii, iv

**65831 Object**

**Respondent:** Mrs Janice Burrell [3289]

**Agent:** N/A

Summary: Councils have not compared Bourn Airfield and West Cambourne Sites fairly regarding Sustainability. Environmental sustainability has been mainly tested on each site's effect on Green Belt rather than locality. Tests should be applied equally. Both sites would bring urban sprawl along A428 with insufficient separation between themselves, Caxton and Caldecote and generate additional traffic detrimental to neighbouring villages. There's no evidence effects have been considered. Will not be self contained are 10 miles from nearest major employment and most commuting likely by car. Improving one bus link will not be enough to mitigate this as Cambridge is only one destination of commuters.

Change To Plan:

Legally Compliant?: Not Specified

Full Reference: O - 65831 - 3289 - MM/SC/2/A - None

# Sustainability Appraisal Addendum Report

Report Date: 24/02/2016

CHAPTER: Sustainability Appraisal Addendum Report 1. Introduction

|                      |                                                                                                                                                                                                                                                                                                                                                                                  |                                                           |
|----------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------|
| <b>65842 Object</b>  | <b>Respondent: CALA Homes (North Homes Counties) Ltd [25454]</b>                                                                                                                                                                                                                                                                                                                 | <b>Agent: Carter Jonas LLP (Brian Flynn) [17331]</b>      |
| Summary:             | We conclude that the SAA Report seeks to justify the existing development strategy and in doing so fails to properly assess the sustainability credentials of providing more housing.                                                                                                                                                                                            |                                                           |
| Change To Plan:      |                                                                                                                                                                                                                                                                                                                                                                                  |                                                           |
| Legally Compliant?:  | Not Specified                                                                                                                                                                                                                                                                                                                                                                    |                                                           |
| Full Reference:      | O - 65842 - 25454 - 1. Introduction - None                                                                                                                                                                                                                                                                                                                                       |                                                           |
| <b>65856 Object</b>  | <b>Respondent: Mr C Meadows [21155]</b>                                                                                                                                                                                                                                                                                                                                          | <b>Agent: Carter Jonas LLP (Brian Flynn) [17331]</b>      |
| Summary:             | We conclude that the SAA Report seeks to justify the existing development strategy and in doing so fails to properly assess the sustainability credentials of providing more housing.                                                                                                                                                                                            |                                                           |
| Change To Plan:      |                                                                                                                                                                                                                                                                                                                                                                                  |                                                           |
| Legally Compliant?:  | Not Specified                                                                                                                                                                                                                                                                                                                                                                    |                                                           |
| Full Reference:      | O - 65856 - 21155 - 1. Introduction - None                                                                                                                                                                                                                                                                                                                                       |                                                           |
| <b>65868 Object</b>  | <b>Respondent: Mr Roger Worboys [3125]</b>                                                                                                                                                                                                                                                                                                                                       | <b>Agent: Carter Jonas LLP (Brian Flynn) [17331]</b>      |
| Summary:             | We conclude that the SAA Report seeks to justify the existing development strategy and in doing so fails to properly assess the sustainability credentials of providing more housing.                                                                                                                                                                                            |                                                           |
| Change To Plan:      |                                                                                                                                                                                                                                                                                                                                                                                  |                                                           |
| Legally Compliant?:  | Not Specified                                                                                                                                                                                                                                                                                                                                                                    |                                                           |
| Full Reference:      | O - 65868 - 3125 - 1. Introduction - None                                                                                                                                                                                                                                                                                                                                        |                                                           |
| <b>65767 Support</b> | <b>Respondent: Urban &amp; Civic [24293]</b>                                                                                                                                                                                                                                                                                                                                     | <b>Agent: David Lock Associates (Darren Bell) [24750]</b> |
| Summary:             | Agree with conclusion of SA Addendum and support it provides to preferred development approach in submitted Local Plans. SA Addendum meets Inspector's concerns by:                                                                                                                                                                                                              |                                                           |
|                      | * clarifying appraisal of all reasonable alternatives;                                                                                                                                                                                                                                                                                                                           |                                                           |
|                      | * clarifying approach to Green Belt and SA; and                                                                                                                                                                                                                                                                                                                                  |                                                           |
|                      | * justifying continued inclusion of new settlements in light of preferred development strategy and Green Belt considerations.                                                                                                                                                                                                                                                    |                                                           |
|                      | Section 8 demonstrated is appropriate to include Green Belt and it can count as an exclusionary factor in identifying reasonable alternatives. Given conclusions of the Cambridge Inner Green Belt Study 2015 - wholly appropriate new settlements key part of meeting development needs.                                                                                        |                                                           |
|                      | Overarching point is importance of new settlements to deliver additional economic and sustainable travel benefits. Vision - high quality public transport corridors from Cambridge. New settlements can leverage additional investment / act as catalysts to delivery - supported by City Deal. Benefits significant against piecemeal Green Belt releases at edge of Cambridge. |                                                           |
| Change To Plan:      |                                                                                                                                                                                                                                                                                                                                                                                  |                                                           |
| Legally Compliant?:  | Not Specified                                                                                                                                                                                                                                                                                                                                                                    |                                                           |
| Full Reference:      | S - 65767 - 24293 - 1. Introduction - None                                                                                                                                                                                                                                                                                                                                       |                                                           |



## 65825 Support

**Respondent:** The Taylor Family & Countryside Properties (UK) Ltd [19841]

**Agent:** Andrew Martin - Planning Limited (Mr Andrew Martin) [16509]

**Summary:** General support for the findings of the SA Addendum that endorse the development sequence set out in the submitted Local Plan. The preferred approach to development continues to reflect the submitted strategy.

**Change To Plan:**

**Legally Compliant?:** Not Specified

**Full Reference:** S - 65825 - 19841 - 1. Introduction - None

## 65969 Support

**Respondent:** Natural England (Ms Gail Hopkins) [25046]

**Agent:** N/A

**Summary:** Natural England believes the Sustainability Appraisal Addendum Report (SAAR) provides a comprehensive assessment of the effects of the local plans with the Proposed Modifications. We are satisfied that this has been prepared in accordance with the requirements of the Planning and Compulsory Purchase Act 2004 and the Strategic Environmental Assessment Regulations.

**Change To Plan:**

**Legally Compliant?:** Not Specified

**Full Reference:** S - 65969 - 25046 - 1. Introduction - None

## 66229 Support

**Respondent:** RLW Estates [1284]

**Agent:** Boyer Planning (Matthew Clarke) [9069]

**Summary:** RLW Estates supports the overall conclusions of the SA Addendum and considers that this reinforcement of the evidence base addresses the Inspector's concerns set out in the letter of 20th May 2015, having assessed the proposed development sequence and development options, and in doing so re-affirmed the development strategy within the submitted Local Plans.

**Change To Plan:**

**Legally Compliant?:** Not Specified

**Full Reference:** S - 66229 - 1284 - 1. Introduction - None

## 66234 Support

**Respondent:** Historic England (Mr David Grech) [23622]

**Agent:** N/A

**Summary:** The SA Addendum Report deals with the strategic development sequence and itself makes the point that 'In conclusion, the updated evidence base and changes to the SA framework have not changed the result of the assessment significantly.' (SA Addendum Report Nontechnical summary paragraph 6.4). We find this work comprehensive and helpful.

**Change To Plan:**

**Legally Compliant?:** Not Specified

**Full Reference:** S - 66234 - 23622 - 1. Introduction - None

65321 Object

**Respondent:** Barratt Eastern Counties and the North West Cambridge Consortium of Landowners [17788] **Agent:** BIDWELLS LLP (MISS MARCIA WHITEHEAD) [25328]

Summary: The Local Plans are not compliant with the SEA Regulations. The SEA process has not been adequate. The further evidence does not adequately address the issues raised by the Inspectors. The Plans don't achieve the 'right balance' across the development hierarchy. The Strategy remains over-reliant upon New Settlements. Whilst sustainable development options exist on the Edge of Cambridge and in Better Served Villages on the Edges of Cambridge, these options have been discounted at an early stage due to Green Belt considerations. This approach has precluded a proper assessment of the reasonable alternatives required by the SEA Regulations.

Change To Plan: Please see attached Critique of the Sustainability Appraisal Addendum

Legally Compliant?: No

Full Reference: O - 65321 - 17788 - 3. Appraisal Methodology - i, ii, iii, iv

65523 Object

**Respondent:** Pigeon Land & LIH [25320] **Agent:** CODE Development Planners Ltd (Ms Karen Beech) [25295]

Summary: There are inconsistencies and inaccuracies in the assessment of reasonable alternatives when compared to the assessment of new settlements which results in a biased advantage for the new settlement options. This does not comply with paragraphs 84 and 165 of the NPPF.

Relevant documents:160125\_CSTpt.pdf

Executive summary  
Section 1 - Introduction - para 1.1 to 1.6  
Section 2 - OAHN & Housing Delivery - section 2.2 - para 2.2.1 to 2.2.5  
Section 3 - Green Belt - para 3.1 to 3.10  
Section 4 - Overall Development Strategy - para 4.1 to 4.5  
Section 5 - Sustainability Appraisal - para 5.1 to 5.11  
Section 7 - Conclusions - para 7.1 to 7.6  
Appendix 2 - para 1.1 to 6.11 plus appendices  
Appendix 3 - para 1.1 to 5.6  
Appendix 4 - Executive summary, para 1.1 to 4.3

Change To Plan: \* Green Belt Study and SA Addendum Report to be revisited to ensure that a consistent approach is adopted for the consideration of all reasonable alternative urban edge sites;

\* Balance between weighting given to sustainability and weighting given to the protection of the Green Belt to be reviewed in order to deliver a sustainable development strategy.

Legally Compliant?: Yes

Full Reference: O - 65523 - 25320 - 3. Appraisal Methodology - i, ii, iii, iv

65541 Object

**Respondent:** Endurance Estates Limited [19174] **Agent:** Bidwells LLP (Susan Chappell) [25316]

Summary: The Local Plans are not compliant with the SEA Regulations. The SEA process has not been adequate. The further evidence does not adequately address the issues raised by the Inspectors. The Plans don't achieve the 'right balance' across the development hierarchy. The Strategy remains over-reliant upon New Settlements. Whilst sustainable development options exist on the Edge of Cambridge and in Better Served Villages on the Edges of Cambridge, these options have been discounted at an early stage due to Green Belt considerations. This approach has precluded a proper assessment of the reasonable alternatives required by the SEA Regulations.

Change To Plan: Please see attached Critique of the Sustainability Appraisal Addendum.

Legally Compliant?: No

Full Reference: O - 65541 - 19174 - 3. Appraisal Methodology - i, iv

## 65614 Object

**Respondent:** Pembroke College & the Balaam Family [21173]

**Agent:** Bidwells LLP (Susan Chappell) [25316]

**Summary:** The Local Plans are not compliant with the SEA Regulations. The SEA process has not been adequate. The further evidence does not adequately address the issues raised by the Inspectors. The Plans don't achieve the 'right balance' across the development hierarchy. The Strategy remains over-reliant upon New Settlements. Whilst sustainable development options exist on the Edge of Cambridge and in Better Served Villages on the Edges of Cambridge, these options have been discounted at an early stage due to Green Belt considerations. This approach has precluded a proper assessment of the reasonable alternatives required by the SEA Regulations.

**Change To Plan:** Please see attached Critique of the Sustainability Appraisal Addendum.

**Legally Compliant?:** No

**Full Reference:** O - 65614 - 21173 - 3. Appraisal Methodology - i, iv

## 65621 Object

**Respondent:** Bidwells (Miss Marcia Whitehead) [17324]

**Agent:** Bidwells LLP (Alison Barnes) [25318]

**Summary:** The Local Plans are not compliant with the SEA Regulations. The SEA process has not been adequate. The further evidence does not adequately address the issues raised by the Inspectors. The Plans don't achieve the 'right balance' across the development hierarchy. The Strategy remains over-reliant upon New Settlements. Whilst sustainable development options exist on the Edge of Cambridge and in Better Served Villages on the Edges of Cambridge, these options have been discounted at an early stage due to Green Belt considerations. This approach has precluded a proper assessment of the reasonable alternatives required by the SEA Regulations.

**Change To Plan:** Please see attached Critique of the Sustainability Appraisal Addendum.

**Legally Compliant?:** No

**Full Reference:** O - 65621 - 17324 - 3. Appraisal Methodology - i, iv

## 65640 Object

**Respondent:** Unwins and Biggs [25382]

**Agent:** Bidwells LLP (Alison Barnes) [25318]

**Summary:** The Local Plans are not compliant with the SEA Regulations. The SEA process has not been adequate. The further evidence does not adequately address the issues raised by the Inspectors. The Plans don't achieve the 'right balance' across the development hierarchy. The Strategy remains over-reliant upon New Settlements. Whilst sustainable development options exist on the Edge of Cambridge and in Better Served Villages on the Edges of Cambridge, these options have been discounted at an early stage due to Green Belt considerations. This approach has precluded a proper assessment of the reasonable alternatives required by the SEA Regulations.

**Change To Plan:** Please see attached Critique of the Sustainability Appraisal Addendum.

**Legally Compliant?:** No

**Full Reference:** O - 65640 - 25382 - 3. Appraisal Methodology - i, iv

## 65656 Object

**Respondent:** Emmanuel & Gonville & Caius [25384]

**Agent:** Bidwells LLP (Alison Barnes) [25318]

**Summary:** The Local Plans are not compliant with the SEA Regulations. The SEA process has not been adequate. The further evidence does not adequately address the issues raised by the Inspectors. The Plans don't achieve the 'right balance' across the development hierarchy. The Strategy remains over-reliant upon New Settlements. Whilst sustainable development options exist on the Edge of Cambridge and in Better Served Villages on the Edges of Cambridge, these options have been discounted at an early stage due to Green Belt considerations. This approach has precluded a proper assessment of the reasonable alternatives required by the SEA Regulations.

**Change To Plan:** Please see attached Critique of the Sustainability Appraisal Addendum.

**Legally Compliant?:** No

**Full Reference:** O - 65656 - 25384 - 3. Appraisal Methodology - i, iv

## 66116 Object

**Respondent:** Grosvenor Developments Ltd and USS [25482]

**Agent:** Savills (Mr Colin Campbell) [15804]

**Summary:** The SA contains contradictions and includes broad sweeping statements which are unsubstantiated. It is unclear how competing issues are resolved.

Various criteria are included, which aren't all compatible and there is no information as to how weighting has been applied where criteria pull in different directions.

Nowhere is the issue of the impact on affordable housing and affordability discussed. Nowhere does it weigh or consider social or economic elements of sustainability. The assessment is therefore flawed

**Change To Plan:** Delete modification

**Legally Compliant?:** Not Specified

**Full Reference:** O - 66116 - 25482 - 3. Appraisal Methodology - ii, iii

66180 Object

Respondent: Great Shelford Ten Acres Limited [8948]

Agent: Bidwells (Mrs Stacey Rawlings) [3140]

Summary: Land at Great Shelford (Ten Acres) forms Site 18 (SHLAA Site SC005) for the purposes of the Sustainability Appraisal, has been subject to the appraisal process. We disagree with the conclusions reached in respect of Landscape, Townscape and Cultural Heritage in respect of this site. Whilst the development of this site would, by virtue of development, result in some encroachment into the transitional area of fields, this could be appropriately mitigated. The Inner Green Belt Review (2015) sets out mitigation measures in order to minimise the impact on Green Belt Purposes. We concur with the parameters within 6.11.6 for Sub area 8.2. The study concludes that this area of land (which includes our Clients site) serves little purpose for the Green Belt and could be released without further harm. The Assessment of Site18 is therefore inaccurate and has not been updated to reflect the updated evidence base. Had this been actioned it would demonstrate that the site is suitable for development and sequentially preferable in delivering the spatial strategy under Policy S/1.

Change To Plan:

Legally Compliant?: No

Full Reference: O - 66180 - 8948 - 3. Appraisal Methodology - None

66186 Object

Respondent: Histon & Impington Parish Council (Ms Chelsea Presland) [20953]

Agent: N/A

Summary: Since 2000 homes in Histon & Impington have flooded 3 occasions. Flooding elsewhere even after investment in flood protection.

Site assessment does not appear to take adequate account, and considers development in areas prone to flooding is safe and sensible. Clear evidence from latest flooding in north of England this is not case.

Site SC227 demonstrates - Approximately 4/5ths within flood zones 2 and 3 yet "Amber". How bad to get "Red" classification?

SC112 - Most is Zone 1 and small part zones 2 and 3" yet "Green". Surely "Amber"?

Site assessments need to be reviewed to be more realistic and less optimistic.

Impact of development proposals in vicinity must be assessed. Whilst major developments on green field sites may build infrastructure to manage water flows, larger developments in settlements likely to increase run off rates and volumes.

Change To Plan:

Legally Compliant?: Not Specified

Full Reference: O - 66186 - 20953 - 3. Appraisal Methodology - None

**66024 Object**                      **Respondent: Commercial Estates Group [17653]**                      **Agent: Nathaniel Lichfield & Partners (Mr Matthew Spry) [20555]**

Summary: 3 key themes of SA require further review:

- 1. Updated evidence base on which SA Addendum has been based is significantly flawed and cannot be considered sound basis upon which robust analysis can be relied.
- 2. Revised appraisal adopts broad brush approach to dismissing large areas of land due to location of Green Belt despite Inner Green Belt Study acknowledging

areas which are acknowledged as contributing significantly to sustainability objectives and less to Green Belt Objectives are capable of release. Rather, less sustainable choices have been made outside of urban area;

- 3. Consideration may need to be given to ensuring all policies of 2 Plans have been subject to consistent SA; particularly given Inspectors concerns.

Refer to accompanying Technical Paper: SA (Appendix 6).

Relevant Attachment  
Cambridge South East 1.4 Section 2(f) -SA (2.55-2.58) and  
Appendix 6(SA Review)

Change To Plan:

Legally Compliant?: No

Full Reference: O - 66024 - 17653 - 4. Review of Development Needs - i, ii, iii

|          |                     |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |                                                                      |
|----------|---------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------|
| Page 302 | <b>65322 Object</b> | <b>Respondent:</b> Barratt Eastern Counties and the North West Cambridge Consortium of Landowners [17788]                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            | <b>Agent:</b> BIDWELLS LLP (MISS MARCIA WHITEHEAD) [25328]           |
|          | Summary:            | The Local Plans are not compliant with the SEA Regulations. The SEA process has not been adequate. The further evidence does not adequately address the issues raised by the Inspectors. The Plans don't achieve the 'right balance' across the development hierarchy. The Strategy remains over-reliant upon New Settlements. Whilst sustainable development options exist on the Edge of Cambridge and in Better Served Villages on the Edges of Cambridge, these options have been discounted at an early stage due to Green Belt considerations. This approach has precluded a proper assessment of the reasonable alternatives required by the SEA Regulations. |                                                                      |
|          | Change To Plan:     | Please see attached Critique of the Sustainability Appraisal Addendum                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |                                                                      |
|          | Legally Compliant?: | No                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |                                                                      |
|          | Full Reference:     | O - 65322 - 17788 - 5. Strategic Development Sequence - i, ii, iii, iv                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |                                                                      |
|          | <b>65537 Object</b> | <b>Respondent:</b> Pigeon Land & LIH [25320]                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         | <b>Agent:</b> CODE Development Planners Ltd (Ms Karen Beech) [25295] |
|          | Summary:            | Inconsistencies and disparities between the assessment of new settlements when compared to the assessment of urban fringes sites;                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |                                                                      |
|          |                     | Lack of clarity and consistency in the comparison of reasonable alternatives with the preferred options.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |                                                                      |
|          |                     | Relevant documents:160125_CSTpt.pdf                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |                                                                      |
|          |                     | Executive summary                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |                                                                      |
|          |                     | Section 1 - Introduction - para 1.1 to 1.6                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |                                                                      |
|          |                     | Section 2 - OAHN & Housing Delivery - section 2.2 - para 2.2.1 to 2.2.5                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |                                                                      |
|          |                     | Section 3 - Green Belt - para 3.1 to 3.10                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |                                                                      |
|          |                     | Section 4 - Overall Development Strategy - para 4.1 to 4.5                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |                                                                      |
|          |                     | Section 5 - Sustainability Appraisal - para 5.1 to 5.11                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |                                                                      |
|          |                     | Section 7 - Conclusions - para 7.1 to 7.6                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |                                                                      |
|          |                     | Appendix 2 - para 1.1 to 6.11 plus appendices                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |                                                                      |
|          |                     | Appendix 3 - para 1.1 to 5.6                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |                                                                      |
|          |                     | Appendix 4 - Executive summary, para 1.1 to 4.3                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |                                                                      |
|          | Change To Plan:     | * Green Belt Study and SA Addendum Report to be revisited to ensure that a consistent approach is adopted for the consideration of all reasonable alternative urban edge sites;                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |                                                                      |
|          |                     | * Balance between weighting given to sustainability and weighting given to the protection of the Green Belt to be reviewed in order to deliver a sustainable development strategy.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |                                                                      |
|          | Legally Compliant?: | Yes                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |                                                                      |
|          | Full Reference:     | O - 65537 - 25320 - 5. Strategic Development Sequence - i, ii, iii, iv                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |                                                                      |
|          | <b>65542 Object</b> | <b>Respondent:</b> Endurance Estates Limited [19174]                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 | <b>Agent:</b> Bidwells LLP (Susan Chappell) [25316]                  |
|          | Summary:            | The Local Plans are not compliant with the SEA Regulations. The SEA process has not been adequate. The further evidence does not adequately address the issues raised by the Inspectors. The Plans don't achieve the 'right balance' across the development hierarchy. The Strategy remains over-reliant upon New Settlements. Whilst sustainable development options exist on the Edge of Cambridge and in Better Served Villages on the Edges of Cambridge, these options have been discounted at an early stage due to Green Belt considerations. This approach has precluded a proper assessment of the reasonable alternatives required by the SEA Regulations. |                                                                      |
|          | Change To Plan:     | Please see attached Critique of the Sustainability Appraisal Addendum.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |                                                                      |
|          | Legally Compliant?: | No                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |                                                                      |
|          | Full Reference:     | O - 65542 - 19174 - 5. Strategic Development Sequence - i, iv                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |                                                                      |

## 65615 Object

**Respondent:** Pembroke College & the Balaam Family [21173]

**Agent:** Bidwells LLP (Susan Chappell) [25316]

**Summary:** The Local Plans are not compliant with the SEA Regulations. The SEA process has not been adequate. The further evidence does not adequately address the issues raised by the Inspectors. The Plans don't achieve the 'right balance' across the development hierarchy. The Strategy remains over-reliant upon New Settlements. Whilst sustainable development options exist on the Edge of Cambridge and in Better Served Villages on the Edges of Cambridge, these options have been discounted at an early stage due to Green Belt considerations. This approach has precluded a proper assessment of the reasonable alternatives required by the SEA Regulations.

**Change To Plan:** Please see attached Critique of the Sustainability Appraisal Addendum.

**Legally Compliant?:** No

**Full Reference:** O - 65615 - 21173 - 5. Strategic Development Sequence - i, iv

## 65622 Object

**Respondent:** Bidwells (Miss Marcia Whitehead) [17324]

**Agent:** Bidwells LLP (Alison Barnes) [25318]

**Summary:** The Local Plans are not compliant with the SEA Regulations. The SEA process has not been adequate. The further evidence does not adequately address the issues raised by the Inspectors. The Plans don't achieve the 'right balance' across the development hierarchy. The Strategy remains over-reliant upon New Settlements. Whilst sustainable development options exist on the Edge of Cambridge and in Better Served Villages on the Edges of Cambridge, these options have been discounted at an early stage due to Green Belt considerations. This approach has precluded a proper assessment of the reasonable alternatives required by the SEA Regulations.

**Change To Plan:** Please see attached Critique of the Sustainability Appraisal Addendum.

**Legally Compliant?:** No

**Full Reference:** O - 65622 - 17324 - 5. Strategic Development Sequence - i, iv

## 65630 Object

**Respondent:** Bidwells (Miss Marcia Whitehead) [17324]

**Agent:** Bidwells LLP (Alison Barnes) [25318]

**Summary:** The Local Plans are not compliant with the SEA Regulations. The SEA process has not been adequate. The further evidence does not adequately address the issues raised by the Inspectors. The Plans don't achieve the 'right balance' across the development hierarchy. The Strategy remains over-reliant upon New Settlements. Whilst sustainable development options exist on the Edge of Cambridge and in Better Served Villages on the Edges of Cambridge, these options have been discounted at an early stage due to Green Belt considerations. This approach has precluded a proper assessment of the reasonable alternatives required by the SEA Regulations.

**Change To Plan:** Please see attached Critique of the Sustainability Appraisal Addendum.

**Legally Compliant?:** No

**Full Reference:** O - 65630 - 17324 - 5. Strategic Development Sequence - i, iv

## 65642 Object

**Respondent:** Unwins and Biggs [25382]

**Agent:** Bidwells LLP (Alison Barnes) [25318]

**Summary:** The Local Plans are not compliant with the SEA Regulations. The SEA process has not been adequate. The further evidence does not adequately address the issues raised by the Inspectors. The Plans don't achieve the 'right balance' across the development hierarchy. The Strategy remains over-reliant upon New Settlements. Whilst sustainable development options exist on the Edge of Cambridge and in Better Served Villages on the Edges of Cambridge, these options have been discounted at an early stage due to Green Belt considerations. This approach has precluded a proper assessment of the reasonable alternatives required by the SEA Regulations.

**Change To Plan:** Please see attached Critique of the Sustainability Appraisal Addendum.

**Legally Compliant?:** No

**Full Reference:** O - 65642 - 25382 - 5. Strategic Development Sequence - i, iv

## 65657 Object

**Respondent:** Emmanuel & Gonville & Caius [25384]

**Agent:** Bidwells LLP (Alison Barnes) [25318]

**Summary:** The Local Plans are not compliant with the SEA Regulations. The SEA process has not been adequate. The further evidence does not adequately address the issues raised by the Inspectors. The Plans don't achieve the 'right balance' across the development hierarchy. The Strategy remains over-reliant upon New Settlements. Whilst sustainable development options exist on the Edge of Cambridge and in Better Served Villages on the Edges of Cambridge, these options have been discounted at an early stage due to Green Belt considerations. This approach has precluded a proper assessment of the reasonable alternatives required by the SEA Regulations.

**Change To Plan:** Please see attached Critique of the Sustainability Appraisal Addendum.

**Legally Compliant?:** No

**Full Reference:** O - 65657 - 25384 - 5. Strategic Development Sequence - i, iv

## 65768 Object

**Respondent: Urban & Civic [24293]**

**Agent: David Lock Associates (Darren Bell) [24750]**

Summary: Concerns about specific judgements taken in assessment of development sequence (Table 5.1) and how relate to detailed assessment of development option packages (Table 7.2) with respect to new settlements. Underplayed sustainability of new settlements, especially specific locational aspects of Waterbeach. Concerns do not undermine overall conclusions of SA and its basis as robust evidence supporting overall development strategy. Relevant to site specific considerations. Relate to judgements taken on land (SA objective 1), landscape (SA objective 7), services and facilities (SA objective 17) and access to jobs (SA objective 20):.

Question conclusions suggesting transport benefits at edge of Cambridge higher than Waterbeach. Edge of Cambridge sites achieve reduced car mode share within, but in highly congested areas with limited scope for improvements. Waterbeach accessible for employment and rail stations. New settlement also provide strong opportunities to minimise traffic growth.

Change To Plan:

Legally Compliant?: Not Specified

Full Reference: O - 65768 - 24293 - 5. Strategic Development Sequence - i, ii

## 65843 Object

**Respondent: CALA Homes (North Homes Counties) Ltd [25454]**

**Agent: Carter Jonas LLP (Brian Flynn) [17331]**

Summary: SA Objective 15 (Housing) in Table 5.1 concludes that there would be a minor positive beneficial impact from each of the options in the development sequence except the urban area which would fail to deliver adequate levels of housing to meet needs. The assessment fails to take into account the fact that the existing new settlements do not deliver policy compliant levels of affordable housing, and we anticipate that a similar outcome would occur at the planned new settlements. The failure to deliver sufficient levels of affordable housing is a negative adverse impact, and would not meet the housing related sustainability objective. There has been no assessment as to whether a higher housing requirement would deliver significant beneficial impacts that would support the housing-related sustainability objectives.

Change To Plan:

Legally Compliant?: Not Specified

Full Reference: O - 65843 - 25454 - 5. Strategic Development Sequence - None

## 65846 Object

**Respondent: CALA Homes (North Homes Counties) Ltd [25454]**

**Agent: Carter Jonas LLP (Brian Flynn) [17331]**

Summary: The proposed Modifications seek to justify the preferred development strategy, rather than consider the delivery of sustainable development.

The overall development strategy and the failure to consider Group Villages for small and medium sized development (except for the parish council-led allocations) is unsound because:

\*it fails to consider all three dimensions of sustainable development jointly and simultaneously;

\*it is contrary to the core planning principles;

\*it does not support the economy of the rural area;

\*it will not address the housing supply and demand in Cambridge and South Cambridgeshire, and significant affordability pressures; and

\*it will not promote sustainable development in rural areas that meets local housing needs and that maintains and enhances the vitality of rural communities.

The social strand of sustainable development has been ignored in the sustainability assessment process, and as a result the positive benefits of meeting housing and affordable housing needs including local needs in villages are not properly factored in to the development strategy.

Change To Plan:

Legally Compliant?: Not Specified

Full Reference: O - 65846 - 25454 - 5. Strategic Development Sequence - None



## 65857 Object

**Respondent: Mr C Meadows [21155]**

**Agent: Carter Jonas LLP (Brian Flynn) [17331]**

Summary: SA Objective 15 (Housing) in Table 5.1 concludes that there would be a minor positive beneficial impact from each of the options in the development sequence except the urban area which would fail to deliver adequate levels of housing to meet needs. The assessment fails to take into account the fact that the existing new settlements do not deliver policy compliant levels of affordable housing, and we anticipate that a similar outcome would occur at the planned new settlements. The failure to deliver sufficient levels of affordable housing is a negative adverse impact, and would not meet the housing related sustainability objective. There has been no assessment as to whether a higher housing requirement would deliver significant beneficial impacts that would support the housing-related sustainability objectives.

Change To Plan:

Legally Compliant?: Not Specified

Full Reference: O - 65857 - 21155 - 5. Strategic Development Sequence - None

## 65858 Object

**Respondent: Mr C Meadows [21155]**

**Agent: Carter Jonas LLP (Brian Flynn) [17331]**

Summary: The proposed Modifications seek to justify the preferred development strategy, rather than consider the delivery of sustainable development.

The overall development strategy and the failure to consider Rural Centres for additional small and medium sized development is unsound because:

\*it fails to consider all three dimensions of sustainable development jointly and simultaneously;

\*it is contrary to the core planning principles;

\*it does not support the economy of the rural area;

\*it will not address the housing supply and demand in Cambridge and South Cambridgeshire, and significant affordability pressures; and

\*it will not promote sustainable development in rural areas that meets local housing needs and that maintains and enhances the vitality of rural communities.

The social strand of sustainable development has been ignored in the sustainability assessment process, and as a result the positive benefits of meeting housing and affordable housing needs including local needs in villages are not properly factored in to the development strategy.

Change To Plan:

Legally Compliant?: Not Specified

Full Reference: O - 65858 - 21155 - 5. Strategic Development Sequence - None

## 65869 Object

**Respondent: Mr Roger Worboys [3125]**

**Agent: Carter Jonas LLP (Brian Flynn) [17331]**

Summary: SA Objective 15 (Housing) in Table 5.1 concludes that there would be a minor positive beneficial impact from each of the options in the development sequence except the urban area which would fail to deliver adequate levels of housing to meet needs. The assessment fails to take into account the fact that the existing new settlements do not deliver policy compliant levels of affordable housing, and we anticipate that a similar outcome would occur at the planned new settlements. The failure to deliver sufficient levels of affordable housing is a negative adverse impact, and would not meet the housing related sustainability objective. There has been no assessment as to whether a higher housing requirement would deliver significant beneficial impacts that would support the housing-related sustainability objectives.

Change To Plan:

Legally Compliant?: Not Specified

Full Reference: O - 65869 - 3125 - 5. Strategic Development Sequence - None

## 65870 Object

**Respondent: Mr Roger Worboys [3125]**

**Agent: Carter Jonas LLP (Brian Flynn) [17331]**

Summary: The proposed Modifications seek to justify the preferred development strategy, rather than consider the delivery of sustainable development.

The overall development strategy and the failure to consider Group Villages for small and medium sized development (except for the parish council-led allocations) is unsound because:

\*it fails to consider all three dimensions of sustainable development jointly and simultaneously;

\*it is contrary to the core planning principles;

\*it does not support the economy of the rural area;

\*it will not address the housing supply and demand in Cambridge and South Cambridgeshire, and significant affordability pressures; and

\*it will not promote sustainable development in rural areas that meets local housing needs and that maintains and enhances the vitality of rural communities.

The social strand of sustainable development has been ignored in the sustainability assessment process, and as a result the positive benefits of meeting housing and affordable housing needs including local needs in villages are not properly factored in to the development strategy.

Change To Plan:

Legally Compliant?: Not Specified

Full Reference: O - 65870 - 3125 - 5. Strategic Development Sequence - None

## 65912 Object

**Respondent: St Johns College [3084]**

**Agent: Savills (Mr Garth Hanlon) [963]**

Summary: Support sequence approach to development. Issue is how much should take place at each location. Councils have assessed development sequence - new SA framework and has judged sustainability effects of alternative strategy options.

Observations made on Table 5.1

1. Air quality and environmental pollution- assumption that all development would have negative impact but individual site assessments show differences

2. Access to wildlife etc: Illogical to give edge of Cambridge and New Settlements equal scoring

3. Landscape and Townscape: Not all landscape on edge of Cambridge is sensitive or high grade agriculture.

Most sustainable location is within Cambridge - lack of land. Next in sequence is edge of Cambridge - significant advantage for developing housing as close to services and employment. Shorter lead in time and certain deliverability. This advantage outweighs presence of Green Belt.

Change To Plan: In the light of comments we object to the assessment in the assessment of " Access to Wildlife and Green Spaces" within Section 6 of Table 5.1: Amend New Settlement assessment to read "++" in the light of Point 2 above.

Also we object to the assessment of "Landscape and Townscape Character" within Section 7 of Table 5.1: Amend to delete " and loss of significant amounts of high agricultural land" within the text under Discussion column.

Legally Compliant?: Not Specified

Full Reference: O - 65912 - 3084 - 5. Strategic Development Sequence - i, iii

## 65945 Object

**Respondent: The Quay Estate [25458]**

**Agent: Carter Jonas LLP (Mr Richard Seamark) [15727]**

Summary: Pgh 5.3 - congestion encourages more journeys to be undertaken by walking and cycling, which is more likely to occur from Edge of Cambridge (EoC) Sites. This is a positive sustainability outcome.

SA Objective 15 - fails to take into account that existing new settlements do not deliver policy compliant levels of affordable housing, a similar outcome would occur at the planned new settlements. This is a negative impact. There is no assessment as to whether a higher housing requirement would deliver significant beneficial impacts.

Objective 20 - The new settlements are less likely to be attractive to high-tech or research and development companies, employment land should be located on the EoC.

Comments on table 5.1 have been provided to demonstrate that EoC is a more sustainable development option.

Change To Plan:

Legally Compliant?: Not Specified

Full Reference: O - 65945 - 25458 - 5. Strategic Development Sequence - ii

## 66025 Object

**Respondent: Commercial Estates Group [17653]**

**Agent: Nathaniel Lichfield & Partners (Mr Matthew Spry) [20555]**

Summary: 3 key themes of SA require further review:

1. Updated evidence base on which SA Addendum has been based is significantly flawed and cannot be considered sound basis upon which robust analysis can be relied.
2. Revised appraisal adopts broad brush approach to dismissing large areas of land due to location of Green Belt despite Inner Green Belt Study acknowledging areas which are acknowledged as contributing significantly to sustainability objectives and less to Green Belt Objectives are capable of release. Rather, less sustainable choices have been made outside of urban area;
3. Consideration may need to be given to ensuring all policies of 2 Plans have been subject to consistent SA; particularly given Inspectors concerns.

Refer to accompanying Technical Paper: SA (Appendix 6).

Relevant Attachment  
Cambridge South East 1.4 Section 2(f) -SA (2.55-2.58) and  
Appendix 6(SA Review)

Change To Plan:

Legally Compliant?: No

Full Reference: O - 66025 - 17653 - 5. Strategic Development Sequence - i, ii, iii

## 66096 Object

**Respondent: Ely Diocesan Board of Finance [3062]**

**Agent: Carter Jonas LLP (Brian Flynn) [17331]**

Summary: Relevant paragraphs in attached document: 32-34.

Object to paragraph 5.4.3. It is a positive sustainability outcome if congestion encourages more journeys to be undertaken by walking and cycling. Tthis is more likely to occur on edge of Cambridge sites.

SA Objective 15 (Housing) in Table 5.1:

\*The assessment fails to take into account that the existing new settlements do not deliver policy compliant levels of affordable housing, and we anticipate that a similar outcome would occur at the planned new settlements. This is a negative adverse impact, and would not meet the housing related sustainability objective.

\*No assessment as to whether a higher housing requirement would deliver significant beneficial impacts that would support the housing-related sustainability objectives.

SA Objective 20 in table 5.1 - Object: Employment land should be on the edge of Cambridge, no evidence that that this would work in new settlements.

Change To Plan:

Legally Compliant?: Not Specified

Full Reference: O - 66096 - 3062 - 5. Strategic Development Sequence - i, ii, iii, iv

## 66134 Object

**Respondent: Cambridgeshire County Council - Strategic Assets Team [25478]**

**Agent: Carter Jonas LLP (Brian Flynn) [17331]**

Summary: Relevant paragraphs of supporting document: 32 to 33

Object to paragraph 5.4.3. It is a positive sustainability outcome if congestion encourages more journeys to be undertaken by walking and cycling. Tthis is more likely to occur on edge of Cambridge sites.

SA Objective 15 (Housing) in Table 5.1:

\*The assessment fails to take into account that the existing new settlements do not deliver policy compliant levels of affordable housing, and we anticipate that a similar outcome would occur at the planned new settlements. This is a negative adverse impact, and would not meet the housing related sustainability objective.

\*No assessment as to whether a higher housing requirement would deliver significant beneficial impacts that would support the housing-related sustainability objectives.

Change To Plan:

Legally Compliant?: Not Specified

Full Reference: O - 66134 - 25478 - 5. Strategic Development Sequence - None

66153 Object

Respondent: South Barton Road Land Owners Group [21301]

Agent: Carter Jonas LLP (Brian Flynn) [17331]

Summary: Relevant paragraphs of supporting document: 35 to 36

Object to paragraph 5.4.3. It is a positive sustainability outcome if congestion encourages more journeys to be undertaken by walking and cycling. Tthis is more likely to occur on edge of Cambridge sites.

SA Objective 15 (Housing) in Table 5.1:

\*The assessment fails to take into account that the existing new settlements do not deliver policy compliant levels of affordable housing, and we anticipate that a similar outcome would occur at the planned new settlements. This is a negative adverse impact, and would not meet the housing related sustainability objective.

\*No assessment as to whether a higher housing requirement would deliver significant beneficial impacts that would support the housing-related sustainability objectives.

Change To Plan:

Legally Compliant?: Not Specified

Full Reference: O - 66153 - 21301 - 5. Strategic Development Sequence - None

66163 Object

Respondent: Shelford Investments Ltd [21149]

Agent: Carter Jonas LLP (Brian Flynn) [17331]

Summary: Relevant paragraphs in supporting document: 33

SA Objective 15 (Housing) in Table 5.1:

\*The assessment fails to take into account that the existing new settlements do not deliver policy compliant levels of affordable housing, and we anticipate that a similar outcome would occur at the planned new settlements. This is a negative adverse impact, and would not meet the housing related sustainability objective.

\*No assessment as to whether a higher housing requirement would deliver significant beneficial impacts that would support the housing-related sustainability objectives.

Change To Plan:

Legally Compliant?: Not Specified

Full Reference: O - 66163 - 21149 - 5. Strategic Development Sequence - None

66219 Object

Respondent: North Barton Road Land Owners Group [21302]

Agent: Carter Jonas LLP (Brian Flynn) [17331]

Summary: Paragraph 5.4.3; It is a positive sustainability outcome if congestion encourages more journeys to be undertaken by walking and cycling, and this is much more likely to occur from edge of Cambridge sites than from settlements located further away, including for example Bourn Airfield. The SA fails to recognise existing new settlements do not deliver policy compliant levels of affordable housing, and we anticipate that a similar outcome would occur at the planned new settlements. The failure to deliver sufficient levels of affordable housing is a negative adverse impact, and would not meet the housing related sustainability objective.

Relevant attachments:

-Jan Representations OAN (25.01.16).pdf

-North BRLOG LP Mods Jan 2016.pdf : Paragraphs 79 to 80.pdf

Change To Plan:

Legally Compliant?: Not Specified

Full Reference: O - 66219 - 21302 - 5. Strategic Development Sequence - None

66231 Object

Respondent: RLW Estates [1284]

Agent: Boyer Planning (Matthew Clarke) [9069]

Summary: Concerns about some details in relation to development sequence (Table 5.1) and development option packages (Table 7.2) with respect to findings on new settlements, in particular lack of recognition of specific advantages offered by Waterbeach. Through examination we have made point Waterbeach has been grouped in with new settlements as generic category, without circumstances and inherent sustainability credentials of location, effectively representing a form of linked urban extension, being drawn out sufficiently. Whilst this has not affected overall conclusions of SA Addendum and on-going support for new settlements, it is felt to be important these issues are highlighted. (Detailed comments on individual scores provided).

Change To Plan: Amend modification

Legally Compliant?: Not Specified

Full Reference: O - 66231 - 1284 - 5. Strategic Development Sequence - None

|                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |                                                                                                           |                                                            |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------|------------------------------------------------------------|
| <b>65323 Object</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           | <b>Respondent:</b> Barratt Eastern Counties and the North West Cambridge Consortium of Landowners [17788] | <b>Agent:</b> BIDWELLS LLP (MISS MARCIA WHITEHEAD) [25328] |
| Summary: The Local Plans are not compliant with the SEA Regulations. The SEA process has not been adequate. The further evidence does not adequately address the issues raised by the Inspectors. The Plans don't achieve the 'right balance' across the development hierarchy. The Strategy remains over-reliant upon New Settlements. Whilst sustainable development options exist on the Edge of Cambridge and in Better Served Villages on the Edges of Cambridge, these options have been discounted at an early stage due to Green Belt considerations. This approach has precluded a proper assessment of the reasonable alternatives required by the SEA Regulations. |                                                                                                           |                                                            |
| Change To Plan: Please see attached Critique of the Sustainability Appraisal Addendum                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |                                                                                                           |                                                            |
| Legally Compliant?: No                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |                                                                                                           |                                                            |
| Full Reference: O - 65323 - 17788 - 6. Site Options - None                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |                                                                                                           |                                                            |
| <b>65648 Object</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           | <b>Respondent:</b> Endurance Estates Limited [19174]                                                      | <b>Agent:</b> Bidwells LLP (Susan Chappell) [25316]        |
| Summary: The Local Plans are not compliant with the SEA Regulations. The SEA process has not been adequate. The further evidence does not adequately address the issues raised by the Inspectors. The Plans don't achieve the 'right balance' across the development hierarchy. The Strategy remains over-reliant upon New Settlements. Whilst sustainable development options exist on the Edge of Cambridge and in Better Served Villages on the Edges of Cambridge, these options have been discounted at an early stage due to Green Belt considerations. This approach has precluded a proper assessment of the reasonable alternatives required by the SEA Regulations. |                                                                                                           |                                                            |
| Change To Plan: Please see attached Critique of the Sustainability Appraisal Addendum.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |                                                                                                           |                                                            |
| Legally Compliant?: No                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |                                                                                                           |                                                            |
| Full Reference: O - 65648 - 19174 - 6. Site Options - i, iv                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |                                                                                                           |                                                            |
| <b>65649 Object</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           | <b>Respondent:</b> Emmanuel & Gonville & Caius [25384]                                                    | <b>Agent:</b> Bidwells LLP (Susan Chappell) [25316]        |
| Summary: The Local Plans are not compliant with the SEA Regulations. The SEA process has not been adequate. The further evidence does not adequately address the issues raised by the Inspectors. The Plans don't achieve the 'right balance' across the development hierarchy. The Strategy remains over-reliant upon New Settlements. Whilst sustainable development options exist on the Edge of Cambridge and in Better Served Villages on the Edges of Cambridge, these options have been discounted at an early stage due to Green Belt considerations. This approach has precluded a proper assessment of the reasonable alternatives required by the SEA Regulations. |                                                                                                           |                                                            |
| Change To Plan: Please see attached Critique of the Sustainability Appraisal Addendum.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |                                                                                                           |                                                            |
| Legally Compliant?: No                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |                                                                                                           |                                                            |
| Full Reference: O - 65649 - 25384 - 6. Site Options - i, iv                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |                                                                                                           |                                                            |
| <b>65652 Object</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           | <b>Respondent:</b> Unwins and Biggs [25382]                                                               | <b>Agent:</b> Bidwells LLP (Alison Barnes) [25318]         |
| Summary: The Local Plans are not compliant with the SEA Regulations. The SEA process has not been adequate. The further evidence does not adequately address the issues raised by the Inspectors. The Plans don't achieve the 'right balance' across the development hierarchy. The Strategy remains over-reliant upon New Settlements. Whilst sustainable development options exist on the Edge of Cambridge and in Better Served Villages on the Edges of Cambridge, these options have been discounted at an early stage due to Green Belt considerations. This approach has precluded a proper assessment of the reasonable alternatives required by the SEA Regulations. |                                                                                                           |                                                            |
| Change To Plan: Please see attached Critique of the Sustainability Appraisal Addendum.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |                                                                                                           |                                                            |
| Legally Compliant?: No                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |                                                                                                           |                                                            |
| Full Reference: O - 65652 - 25382 - 6. Site Options - i, iv                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |                                                                                                           |                                                            |

## 65655 Object

**Respondent: Bidwells (Miss Marcia Whitehead) [17324]**

**Agent: Bidwells LLP (Alison Barnes) [25318]**

Summary: The Local Plans are not compliant with the SEA Regulations. The SEA process has not been adequate. The further evidence does not adequately address the issues raised by the Inspectors. The Plans don't achieve the 'right balance' across the development hierarchy. The Strategy remains over-reliant upon New Settlements. Whilst sustainable development options exist on the Edge of Cambridge and in Better Served Villages on the Edges of Cambridge, these options have been discounted at an early stage due to Green Belt considerations. This approach has precluded a proper assessment of the reasonable alternatives required by the SEA Regulations.

Change To Plan: Please see attached Critique of the Sustainability Appraisal Addendum.

Legally Compliant?: No

Full Reference: O - 65655 - 17324 - 6. Site Options - i, iv

## 65666 Object

**Respondent: Emmanuel & Gonville & Caius [25384]**

**Agent: Bidwells LLP (Alison Barnes) [25318]**

Summary: The Local Plans are not compliant with the SEA Regulations. The SEA process has not been adequate. The further evidence does not adequately address the issues raised by the Inspectors. The Plans don't achieve the 'right balance' across the development hierarchy. The Strategy remains over-reliant upon New Settlements. Whilst sustainable development options exist on the Edge of Cambridge and in Better Served Villages on the Edges of Cambridge, these options have been discounted at an early stage due to Green Belt considerations. This approach has precluded a proper assessment of the reasonable alternatives required by the SEA Regulations.

Change To Plan: Please see attached Critique of the Sustainability Appraisal Addendum.

Legally Compliant?: No

Full Reference: O - 65666 - 25384 - 6. Site Options - i, iv

## 65815 Object

**Respondent: Hardwick Parish Council (Mrs G Stoehr) [1891]**

**Agent: N/A**

Summary: In Table 2 of the supporting document we have extracted key information from the Sustainability Analysis on two site options to illustrate how much more sustainable edge of city sites are than new settlements. The two options used are:  
\* Option 2: Bourn Airfield New Settlement and Village Focus  
\* Option 6: Edge of Cambridge and Village Focus

Table 2 shows clearly, using the Councils own information, that edge of city sites are more sustainable and cost-effective than new settlements.

The score for Bourn Airfield's is incorrect. Given that two-thirds of commuters from Bourn Airfield would have to travel to work by car and drive 20-30 miles a day, it cannot be argued that a new settlement at Bourn Airfield supports the Council's Sustainable Transport objective. Bourn Airfield should be scored: Potentially significant adverse impact which conflicts with the objective.

Paragraphs 21 to 28 and table 2 of supporting document.

Change To Plan: Amend modification due to reasons set out above.

Legally Compliant?: Not Specified

Full Reference: O - 65815 - 1891 - 6. Site Options - i, iii

65816 Object

Respondent: Caxton Parish Council (Mrs Gail Stoehr) [1153]

Agent: N/A

Summary:

In Table 2 of the supporting document we have extracted key information from the Sustainability Analysis on two site options to illustrate how much more sustainable edge of city sites are than new settlements. The two options used are:  
\* Option 2: Bourn Airfield New Settlement and Village Focus  
\* Option 6: Edge of Cambridge and Village Focus

Table 2 shows clearly, using the Councils own information, that edge of city sites are more sustainable and cost-effective than new settlements.

The score for Bourn Airfield's is incorrect. Given that two-thirds of commuters from Bourn Airfield would have to travel to work by car and drive 20-30 miles a day, it cannot be argued that a new settlement at Bourn Airfield supports the Council's Sustainable Transport objective. Bourn Airfield should be scored: Potentially significant adverse impact which conflicts with the objective.

Paragraphs 21 to 28 and table 2 of supporting document.

Change To Plan: Amend modification due to reasons set out above.

Legally Compliant?: Not Specified

Full Reference: O - 65816 - 1153 - 6. Site Options - i, iii

66030 Object

Respondent: Martin Grant Homes Ltd & Harcourt Developments (UK) Ltd [21709]

Agent: Savills (Mr Andrew Raven) [18884]

Summary: The SAA has not addressed the issues raised by the Inspectors. The SAA does not appraise sites on an equal basis. For example, land north of Cambourne is appraised completely differently to land at Bourn Airfield. The SA process remains flawed, and the strategic option for development north of Cambourne should be considered. An alternative solution that would allow the Local Plan to progress through to adoption is to confirm development is to be brought forwards in close proximity to Cambourne and to consider the potential for development north of Cambourne as an alternative to Bourn Airfield through a SA as part of the preparation of an Area Action Plan.

Change To Plan:

Legally Compliant?: No

Full Reference: O - 66030 - 21709 - 6. Site Options - i, ii, iii, iv

66033 Object

Respondent: Martin Grant Homes Ltd & Harcourt Developments (UK) Ltd [21709]

Agent: Savills (Mr Andrew Raven) [18884]

Summary: Chapter 6: The Inspectors' letter required a comparable assessment to be carried out, so that the concerns that the Council raises in relation to new settlements can be compared to the impacts of development in the Green Belt, and the benefits of extensions to existing urban area. The Council has failed to carry out such a revised assessment.

Change To Plan:

Legally Compliant?: No

Full Reference: O - 66033 - 21709 - 6. Site Options - i, ii, iii, iv

66034 Object

Respondent: Martin Grant Homes Ltd & Harcourt Developments (UK) Ltd [21709]

Agent: Savills (Mr Andrew Raven) [18884]

Summary: Section 6.6: The current Sites Assessment contains illogical and perverse assessments of North Cambourne when compared with Bourn Airfield. We have consistently identified this inconsistency in the way the two Councils have appraised the sites, which gives the appearance of a post-hoc justification for the site selection that the Councils have made rather than a true assessment of their relative merits. The Proposed Modifications and Sustainability Assessment Addendum do not remedy the failings of the Assessment and the changes noted are required in order to fairly demonstrate that a development on land north of Cambourne is far more sustainable than a similar scale of development at Bourn Airfield.

Change To Plan:

Legally Compliant?: No

Full Reference: O - 66034 - 21709 - 6. Site Options - i, ii, iii, iv

**65326 Object**                      **Respondent:** Barratt Eastern Counties and the North West Cambridge Consortium of Landowners [17788]                      **Agent:**    BIDWELLS LLP (MISS MARCIA WHITEHEAD) [25328]

Summary: The Local Plans are not compliant with the SEA Regulations. The SEA process has not been adequate. The further evidence does not adequately address the issues raised by the Inspectors. The Plans don't achieve the 'right balance' across the development hierarchy. The Strategy remains over-reliant upon New Settlements. Whilst sustainable development options exist on the Edge of Cambridge and in Better Served Villages on the Edges of Cambridge, these options have been discounted at an early stage due to Green Belt considerations. This approach has precluded a proper assessment of the reasonable alternatives required by the SEA Regulations.

Change To Plan: Please see attached Critique of the Sustainability Appraisal Addendum

Legally Compliant?: No

Full Reference: O - 65326 - 17788 - 7. Strategic Development Alternatives - i, ii, iii, iv

**65631 Object**                      **Respondent:** Endurance Estates Limited [19174]                      **Agent:**    Bidwells LLP (Susan Chappell) [25316]

Summary: The Local Plans are not compliant with the SEA Regulations. The SEA process has not been adequate. The further evidence does not adequately address the issues raised by the Inspectors. The Plans don't achieve the 'right balance' across the development hierarchy. The Strategy remains over-reliant upon New Settlements. Whilst sustainable development options exist on the Edge of Cambridge and in Better Served Villages on the Edges of Cambridge, these options have been discounted at an early stage due to Green Belt considerations. This approach has precluded a proper assessment of the reasonable alternatives required by the SEA Regulations.

Change To Plan: Please see attached Critique of the Sustainability Appraisal Addendum.

Legally Compliant?: No

Full Reference: O - 65631 - 19174 - 7. Strategic Development Alternatives - i, iv

**65632 Object**                      **Respondent:** Bidwells (Miss Marcia Whitehead) [17324]                      **Agent:**    Bidwells LLP (Alison Barnes) [25318]

Summary: The Local Plans are not compliant with the SEA Regulations. The SEA process has not been adequate. The further evidence does not adequately address the issues raised by the Inspectors. The Plans don't achieve the 'right balance' across the development hierarchy. The Strategy remains over-reliant upon New Settlements. Whilst sustainable development options exist on the Edge of Cambridge and in Better Served Villages on the Edges of Cambridge, these options have been discounted at an early stage due to Green Belt considerations. This approach has precluded a proper assessment of the reasonable alternatives required by the SEA Regulations.

Change To Plan: Please see attached Critique of the Sustainability Appraisal Addendum.

Legally Compliant?: No

Full Reference: O - 65632 - 17324 - 7. Strategic Development Alternatives - i, iv

**65639 Object**                      **Respondent:** Emmanuel & Gonville & Caius [25384]                      **Agent:**    Bidwells LLP (Susan Chappell) [25316]

Summary: The Local Plans are not compliant with the SEA Regulations. The SEA process has not been adequate. The further evidence does not adequately address the issues raised by the Inspectors. The Plans don't achieve the 'right balance' across the development hierarchy. The Strategy remains over-reliant upon New Settlements. Whilst sustainable development options exist on the Edge of Cambridge and in Better Served Villages on the Edges of Cambridge, these options have been discounted at an early stage due to Green Belt considerations. This approach has precluded a proper assessment of the reasonable alternatives required by the SEA Regulations.

Change To Plan: Please see attached Critique of the Sustainability Appraisal Addendum.

Legally Compliant?: No

Full Reference: O - 65639 - 25384 - 7. Strategic Development Alternatives - i, iv



## 65644 Object

**Respondent: Unwins and Biggs [25382]**

**Agent: Bidwells LLP (Alison Barnes) [25318]**

Summary: The Local Plans are not compliant with the SEA Regulations. The SEA process has not been adequate. The further evidence does not adequately address the issues raised by the Inspectors. The Plans don't achieve the 'right balance' across the development hierarchy. The Strategy remains over-reliant upon New Settlements. Whilst sustainable development options exist on the Edge of Cambridge and in Better Served Villages on the Edges of Cambridge, these options have been discounted at an early stage due to Green Belt considerations. This approach has precluded a proper assessment of the reasonable alternatives required by the SEA Regulations.

Change To Plan: Please see attached Critique of the Sustainability Appraisal Addendum.

Legally Compliant?: No

Full Reference: O - 65644 - 25382 - 7. Strategic Development Alternatives - i, iv

## 65660 Object

**Respondent: Emmanuel & Gonville & Caius [25384]**

**Agent: Bidwells LLP (Alison Barnes) [25318]**

Summary: The Local Plans are not compliant with the SEA Regulations. The SEA process has not been adequate. The further evidence does not adequately address the issues raised by the Inspectors. The Plans don't achieve the 'right balance' across the development hierarchy. The Strategy remains over-reliant upon New Settlements. Whilst sustainable development options exist on the Edge of Cambridge and in Better Served Villages on the Edges of Cambridge, these options have been discounted at an early stage due to Green Belt considerations. This approach has precluded a proper assessment of the reasonable alternatives required by the SEA Regulations.

Change To Plan: Please see attached Critique of the Sustainability Appraisal Addendum.

Legally Compliant?: No

Full Reference: O - 65660 - 25384 - 7. Strategic Development Alternatives - i, iv

## 65769 Object

**Respondent: Urban & Civic [24293]**

**Agent: David Lock Associates (Darren Bell) [24750]**

Summary: Concerns about specific judgements taken in assessment of development sequence (Table 5.1) and how relate to detailed assessment of development option packages (Table 7.2) with respect to new settlements. Underplayed sustainability of new settlements, especially specific locational aspects of Waterbeach. Concerns do not undermine overall conclusions of SA and its basis as robust evidence supporting overall development strategy. Relevant to site specific considerations. Relate to judgements taken on land (SA objective 1), landscape (SA objective 7), services and facilities (SA objective 17) and access to jobs (SA objective 20):.

Question conclusions suggesting transport benefits at edge of Cambridge higher than Waterbeach. Edge of Cambridge sites achieve reduced car mode share within, but in highly congested areas with limited scope for improvements. Waterbeach accessible for employment and rail stations. New settlement also provide strong opportunities to minimise traffic growth.

Change To Plan:

Legally Compliant?: Not Specified

Full Reference: O - 65769 - 24293 - 7. Strategic Development Alternatives - i, ii

## 66026 Object

**Respondent: Commercial Estates Group [17653]**

**Agent: Nathaniel Lichfield & Partners (Mr Matthew Spry) [20555]**

Summary: 3 key themes of SA require further review:

1. Updated evidence base on which SA Addendum has been based is significantly flawed and cannot be considered sound basis upon which robust analysis can be relied.
2. Revised appraisal adopts broad brush approach to dismissing large areas of land due to location of Green Belt despite Inner Green Belt Study acknowledging areas which are acknowledged as contributing significantly to sustainability objectives and less to Green Belt Objectives are capable of release. Rather, less sustainable choices have been made outside of urban area;
3. Consideration may need to be given to ensuring all policies of 2 Plans have been subject to consistent SA; particularly given Inspectors concerns.

Refer to accompanying Technical Paper: SA (Appendix 6).

Relevant Attachment  
Cambridge South East 1.4 Section 2(f) -SA (2.55-2.58) and  
Appendix 6(SA Review)

Change To Plan:

Legally Compliant?: No

Full Reference: O - 66026 - 17653 - 7. Strategic Development Alternatives - i, ii, iii

## 66035 Object

**Respondent:** Martin Grant Homes Ltd & Harcourt Developments (UK) Ltd [21709]

**Agent:** Savills (Mr Andrew Raven) [18884]

**Summary:** Chapter 7: The strategic development alternatives should have been amended to include the testing of a development north of Cambourne, linked to the existing settlement, given the evidence submitted that supports this approach. Reasonable alternatives have not therefore been tested, and the SEA/SA process remains unsound.

**Change To Plan:**

**Legally Compliant?:** No

**Full Reference:** O - 66035 - 21709 - 7. Strategic Development Alternatives - i, ii, iii, iv

## 66037 Object

**Respondent:** Martin Grant Homes Ltd & Harcourt Developments (UK) Ltd [21709]

**Agent:** Savills (Mr Andrew Raven) [18884]

**Summary:** Table 7.2: The process by which the spatial strategy for the Local Plan has been derived remains flawed and legally deficient, specifically in terms of the SEA Regulations. It is also inconsistent with the tests of soundness specified in the NPPF, paragraph 182, particularly the requirement for Local Plans to be justified. A more consistent evidence base needs to be put in place that appraises the reasonable development options on an equitable basis.

**Change To Plan:**

**Legally Compliant?:** No

**Full Reference:** O - 66037 - 21709 - 7. Strategic Development Alternatives - i, ii, iii, iv

## 66097 Object

**Respondent:** Ely Diocesan Board of Finance [3062]

**Agent:** Carter Jonas LLP (Brian Flynn) [17331]

**Summary:** Relevant paragraphs in attached document: 35

In our opinion, the SAA Report appears to accept the findings of the supporting studies without any critical analysis. The SAA Report assessed the preferred development strategy against sustainability credentials based on the findings of the Objectively Assessment Housing Need - Further Evidence and the Inner Green Belt Review 2015, and then concluded that it would be unsustainable to release land from the Green Belt. That is not the end of the assessment process. A further stage of the assessment process should have considered whether the preferred development strategy would deliver sustainable development.

**Change To Plan:**

**Legally Compliant?:** Not Specified

**Full Reference:** O - 66097 - 3062 - 7. Strategic Development Alternatives - None

## 66098 Object

**Respondent:** Ely Diocesan Board of Finance [3062]

**Agent:** Carter Jonas LLP (Brian Flynn) [17331]

**Summary:** Relevant paragraphs in attached document: 36-39.

We have concerns about the how the relationship between the Green Belt and sustainable development has been address in the Development Strategy Update. The significant sustainability advantages of locating development on the edge of Cambridge have been identified and acknowledged, but then dismissed by the Council in the development strategy.

here has been no assessment of safeguarded land to meet long term development needs or alternative sites that could be identified as safeguarded land.

The social and economic strands of sustainable development have been ignored in the sustainability assessment process, and as a result the positive benefits of meeting housing and affordable housing needs and adopting a flexible approach to employment growth are not properly factored in to the development strategy.

**Change To Plan:**

**Legally Compliant?:** Not Specified

**Full Reference:** O - 66098 - 3062 - 7. Strategic Development Alternatives - None

## 66135 Object

**Respondent:** Cambridgeshire County Council - Strategic Assets Team [25478]

**Agent:** Carter Jonas LLP (Brian Flynn) [17331]

Summary: Relevant paragraphs in supporting document: 35-36 & 37.

The Plans have given inadequate weight to the assessment of sustainability matters. The significant sustainability advantages of locating development on the edge of Cambridge have been identified and acknowledged, but then dismissed by the Council in the development strategy.

Change To Plan:

Legally Compliant?: Not Specified

Full Reference: O - 66135 - 25478 - 7. Strategic Development Alternatives - i, ii, iii, iv

## 66136 Object

**Respondent:** Cambridgeshire County Council - Strategic Assets Team [25478]

**Agent:** Carter Jonas LLP (Brian Flynn) [17331]

Summary: Relevant paragraphs of supporting document: 37

The proportion of affordable housing provided at planned and proposed new settlements would not be 'significant'. The current new settlement at Northstowe is planned to provide just 20% affordable housing which is less than policy compliant levels of affordable housing. The under-delivery of affordable housing in the existing new settlements undermines efforts to provide acceptable levels of affordable housing to meet known needs across Cambridgeshire.

Change To Plan:

Legally Compliant?: Not Specified

Full Reference: O - 66136 - 25478 - 7. Strategic Development Alternatives - None

## 66155 Object

**Respondent:** South Barton Road Land Owners Group [21301]

**Agent:** Carter Jonas LLP (Brian Flynn) [17331]

Summary: Relevant paragraphs in supporting document: 38-43

The Plans have given inadequate weight to the assessment of sustainability matters. The significant sustainability advantages of locating development on the edge of Cambridge have been identified and acknowledged, but then dismissed by the Council in the development strategy.

The overall development strategy is contrary to NPPF paragraphs: 7, 8, 17, 19, 20, 30 & 47.

Development on the edge of Cambridge is more viable especially in terms of infrastructure.

The positive benefits of meeting housing and affordable housing needs are not properly factored in to the development strategy.

Change To Plan:

Legally Compliant?: Not Specified

Full Reference: O - 66155 - 21301 - 7. Strategic Development Alternatives - None

## 66164 Object

**Respondent:** Shelford Investments Ltd [21149]

**Agent:** Carter Jonas LLP (Brian Flynn) [17331]

Summary: Relevant paragraphs in supporting document: 34-37

The Plans have given inadequate weight to the assessment of sustainability matters. The significant sustainability advantages of locating development on the edge of Cambridge have been identified and acknowledged, but then dismissed by the Council in the development strategy.

The overall development strategy is contrary to NPPF paragraphs: 7, 8, 17, 19, 20, 30 & 47.

Development on the edge of Cambridge is more viable especially in terms of infrastructure.

The positive benefits of meeting housing and affordable housing needs are not properly factored in to the development strategy.

Change To Plan:

Legally Compliant?: Not Specified

Full Reference: O - 66164 - 21149 - 7. Strategic Development Alternatives - None

## 66178 Object

**Respondent: Great Shelford Ten Acres Limited [8948]**

**Agent: Bidwells (Mrs Stacey Rawlings) [3140]**

Summary: Our response to the Sustainability Appraisal is set out in the accompanying report Critique of Councils' Sustainability Appraisal. Land at Great Shelford (Ten Acres) forms Site 18 (SHLAA Site SC005) for the purposes of the Sustainability Appraisal, has been subject to the appraisal process. We disagree with the conclusions reached in respect of Landscape, Townscape and Cultural Heritage in respect of this site. Whilst the development of this site would, by virtue of development, result in some encroachment into the transitional area of fields, this could be appropriately mitigated. The Inner Green Belt Review (2015) sets out mitigation measures in order to minimise the impact on Green Belt Purposes. We concur with the parameters within 6.11.6 for Sub area 8.2. The study concludes that this area of land (which includes our Clients site) serves little purpose for the Green Belt and could be released without further harm. The Assessment of Site18 is therefore inaccurate and has not been updated to reflect the updated evidence base. Had this been actioned it would demonstrate that the site is suitable for development and sequentially preferable in delivering the spatial strategy under Policy S/1.

See attached documents:

\* SA Alternatives.pdf

\* Critique of the Councils' Sustainability Appraisal.pdf

Change To Plan:

Legally Compliant?: No

Full Reference: O - 66178 - 8948 - 7. Strategic Development Alternatives - None

## 66221 Object

**Respondent: North Barton Road Land Owners Group [21302]**

**Agent: Carter Jonas LLP (Brian Flynn) [17331]**

Summary: The development strategy:  
\* it fails to consider all three dimensions of sustainable development  
\* it is contrary to the core planning principles  
\* it does not support the economy of Cambridge;  
\* it fails to promote future travel by sustainable modes of transport  
\* it will not meet housing need objectives; and,  
\* it will not address the housing supply and demand in the Cambridge area, and significant affordability pressures.

Relevant attachments:

-Jan Representations OAN (25.01.16).pdf

-North BRLOG LP Mods Jan 2016.pdf : Paragraphs 82 to 87.pdf

Change To Plan:

Legally Compliant?: Not Specified

Full Reference: O - 66221 - 21302 - 7. Strategic Development Alternatives - None

## 66232 Object

**Respondent: RLW Estates [1284]**

**Agent: Boyer Planning (Matthew Clarke) [9069]**

Summary: Concerns about some details in relation to development sequence (Table 5.1) and development option packages (Table 7.2) with respect to findings on new settlements, in particular lack of recognition of specific advantages offered by Waterbeach. Through examination we have made point Waterbeach has been grouped in with new settlements as generic category, without circumstances and inherent sustainability credentials of location, effectively representing a form of linked urban extension, being drawn out sufficiently. Whilst this has not affected overall conclusions of SA Addendum and on-going support for new settlements, it is felt to be important these issues are highlighted. (Detailed comments on individual scores provided).

Change To Plan: Amend modification

Legally Compliant?: Not Specified

Full Reference: O - 66232 - 1284 - 7. Strategic Development Alternatives - None



65564 Object

Respondent: Barratt Eastern Counties and the North West Cambridge Consortium of Landowners [17788]

Agent: BIDWELLS LLP (MISS MARCIA WHITEHEAD) [25328]

Summary: The Landscape Agency carried out a review of the "Cambridge Inner Green Belt Boundary Study" (November 2015) to consider whether additional land on the north-west side of Cambridge, between Huntingdon Road and Histon Road, could be released from the Green Belt.

The Landscape Agency consider additional development could be accommodated without adversely affecting the purpose of the Green Belt. There would be no major additional impact on the rural character and a landscape buffer would be retained along the A14, providing a soft urban edge. The open setting to Girton and separation between the village and Cambridge would be retained.

Change To Plan: The Local Plan should be amended to reflect an enlarged allocation of land for development between Histon Road and Huntingdon Road as detailed within the report.

Legally Compliant?: No

Full Reference: O - 65564 - 17788 - 8. Green Belt in the SA - i, ii, iv

65633 Object

Respondent: Endurance Estates Limited [19174]

Agent: Bidwells LLP (Susan Chappell) [25316]

Summary: The Local Plans are not compliant with the SEA Regulations. The SEA process has not been adequate. The further evidence does not adequately address the issues raised by the Inspectors. The Plans don't achieve the 'right balance' across the development hierarchy. The Strategy remains over-reliant upon New Settlements. Whilst sustainable development options exist on the Edge of Cambridge and in Better Served Villages on the Edges of Cambridge, these options have been discounted at an early stage due to Green Belt considerations. This approach has precluded a proper assessment of the reasonable alternatives required by the SEA Regulations.

Change To Plan: Please see attached Critique of the Sustainability Appraisal Addendum.

Legally Compliant?: No

Full Reference: O - 65633 - 19174 - 8. Green Belt in the SA - i, iv

65634 Object

Respondent: Bidwells (Miss Marcia Whitehead) [17324]

Agent: Bidwells LLP (Alison Barnes) [25318]

Summary: The Local Plans are not compliant with the SEA Regulations. The SEA process has not been adequate. The further evidence does not adequately address the issues raised by the Inspectors. The Plans don't achieve the 'right balance' across the development hierarchy. The Strategy remains over-reliant upon New Settlements. Whilst sustainable development options exist on the Edge of Cambridge and in Better Served Villages on the Edges of Cambridge, these options have been discounted at an early stage due to Green Belt considerations. This approach has precluded a proper assessment of the reasonable alternatives required by the SEA Regulations.

Change To Plan: Please see attached Critique of the Sustainability Appraisal Addendum.

Legally Compliant?: No

Full Reference: O - 65634 - 17324 - 8. Green Belt in the SA - i, iv

65641 Object

Respondent: Emmanuel & Gonville & Caius [25384]

Agent: Bidwells LLP (Susan Chappell) [25316]

Summary: The Local Plans are not compliant with the SEA Regulations. The SEA process has not been adequate. The further evidence does not adequately address the issues raised by the Inspectors. The Plans don't achieve the 'right balance' across the development hierarchy. The Strategy remains over-reliant upon New Settlements. Whilst sustainable development options exist on the Edge of Cambridge and in Better Served Villages on the Edges of Cambridge, these options have been discounted at an early stage due to Green Belt considerations. This approach has precluded a proper assessment of the reasonable alternatives required by the SEA Regulations.

Change To Plan: Please see attached Critique of the Sustainability Appraisal Addendum.

Legally Compliant?: No

Full Reference: O - 65641 - 25384 - 8. Green Belt in the SA - i, iv

65646 Object

Respondent: Unwins and Biggs [25382]

Agent: Bidwells LLP (Alison Barnes) [25318]

Summary: The Local Plans are not compliant with the SEA Regulations. The SEA process has not been adequate. The further evidence does not adequately address the issues raised by the Inspectors. The Plans don't achieve the 'right balance' across the development hierarchy. The Strategy remains over-reliant upon New Settlements. Whilst sustainable development options exist on the Edge of Cambridge and in Better Served Villages on the Edges of Cambridge, these options have been discounted at an early stage due to Green Belt considerations. This approach has precluded a proper assessment of the reasonable alternatives required by the SEA Regulations.

Change To Plan: Please see attached Critique of the Sustainability Appraisal Addendum.

Legally Compliant?: No

Full Reference: O - 65646 - 25382 - 8. Green Belt in the SA - i, iv

|                     |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |                                                                            |
|---------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------|
| <b>65661 Object</b> | <b>Respondent: Emmanuel &amp; Gonville &amp; Caius [25384]</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   | <b>Agent: Bidwells LLP (Alison Barnes) [25318]</b>                         |
| Summary:            | The Local Plans are not compliant with the SEA Regulations. The SEA process has not been adequate. The further evidence does not adequately address the issues raised by the Inspectors. The Plans don't achieve the 'right balance' across the development hierarchy. The Strategy remains over-reliant upon New Settlements. Whilst sustainable development options exist on the Edge of Cambridge and in Better Served Villages on the Edges of Cambridge, these options have been discounted at an early stage due to Green Belt considerations. This approach has precluded a proper assessment of the reasonable alternatives required by the SEA Regulations.                                                                                                             |                                                                            |
| Change To Plan:     | Please see attached Critique of the Sustainability Appraisal Addendum.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |                                                                            |
| Legally Compliant?: | No                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |                                                                            |
| Full Reference:     | O - 65661 - 25384 - 8. Green Belt in the SA - i, iv                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |                                                                            |
| <b>65947 Object</b> | <b>Respondent: The Quay Estate [25458]</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       | <b>Agent: Carter Jonas LLP (Mr Richard Seamark) [15727]</b>                |
| Summary:            | How did the Councils satisfy themselves that the major release of Cambridge East would not affect these issues? Is there any evidence available to the Councils to suggest that the recent extensions to Cambridge, particularly to the south of the city, have started to affect compactness/dynamism of the city?                                                                                                                                                                                                                                                                                                                                                                                                                                                              |                                                                            |
|                     | The provision of new green infrastructure radiating to the fringes from the centre, public transport services, establishment of the Biomedical Campus etc. would, in our view, serve to preserve or enhance compactness/dynamism.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |                                                                            |
|                     | We comment on the findings and conclusions of the Development Strategy Report in our attached Appendix C. In our opinion, the SAAR appears to accept the findings of the supporting studies without any critical analysis. A further stage of the assessment process should have considered whether the preferred development strategy would deliver sustainable development.                                                                                                                                                                                                                                                                                                                                                                                                    |                                                                            |
| Change To Plan:     |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |                                                                            |
| Legally Compliant?: | Not Specified                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |                                                                            |
| Full Reference:     | O - 65947 - 25458 - 8. Green Belt in the SA - i, ii                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |                                                                            |
| <b>66027 Object</b> | <b>Respondent: Commercial Estates Group [17653]</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              | <b>Agent: Nathaniel Lichfield &amp; Partners (Mr Matthew Spry) [20555]</b> |
| Summary:            | 3 key themes of SA require further review:                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |                                                                            |
|                     | <ol style="list-style-type: none"><li>1. Updated evidence base on which SA Addendum has been based is significantly flawed and cannot be considered sound basis upon which robust analysis can be relied.</li><li>2. Revised appraisal adopts broad brush approach to dismissing large areas of land due to location of Green Belt despite Inner Green Belt Study acknowledging areas which are acknowledged as contributing significantly to sustainability objectives and less to Green Belt Objectives are capable of release. Rather, less sustainable choices have been made outside of urban area;</li><li>3. Consideration may need to be given to ensuring all policies of 2 Plans have been subject to consistent SA; particularly given Inspectors concerns.</li></ol> |                                                                            |
|                     | Refer to accompanying Technical Paper: SA (Appendix 6).                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |                                                                            |
|                     | Relevant Attachment<br>Cambridge South East 1.4 Section 2(f) -SA (2.55-2.58) and<br>Appendix 6(SA Review)                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |                                                                            |
| Change To Plan:     |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |                                                                            |
| Legally Compliant?: | No                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |                                                                            |
| Full Reference:     | O - 66027 - 17653 - 8. Green Belt in the SA - i, ii, iii                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |                                                                            |

## 66137 Object

**Respondent:** Cambridgeshire County Council - Strategic Assets Team [25478]

**Agent:** Carter Jonas LLP (Brian Flynn) [17331]

Summary: Relevant paragraphs in supporting document: 34 & 38 to 40.

Have concerns that the methodology in the IGBR 2015 is biased to suit the preferred development strategy, and does not assess sites to meet objectively assessed housing need.

Disagree with conclusions of the assessment of sector 11 sub area 11.2 (pghs 6.14.5-6.14.6 Inner Green Belt Review 2015).

Most of the land within Sub Area 11.2 should be released from the Green Belt for development, in conjunction strategic landscaping adjacent to Limekiln Road to create a long term boundary for the Green Belt in this location.

We have concerns about the how the relationship between the Green Belt and sustainable development has been address in the Development Strategy Update. The significant sustainability advantages of locating development on the edge of Cambridge have been identified and acknowledged, but then dismissed by the Council in the development strategy.

here has been no assessment of safeguarded land to meet long term development needs or alternative sites that could be identified as safeguarded land.

The social and economic strands of sustainable development have been ignored in the sustainability assessment process, and as a result the positive benefits of meeting housing and affordable housing needs and adopting a flexible approach to employment growth are not properly factored in to the development strategy.

Change To Plan:

Legally Compliant?: Not Specified

Full Reference: O - 66137 - 25478 - 8. Green Belt in the SA - None

## 66154 Object

**Respondent:** South Barton Road Land Owners Group [21301]

**Agent:** Carter Jonas LLP (Brian Flynn) [17331]

Summary: Relevant paragraphs of supporting document: 37

In our opinion, the SAA Report appears to accept the findings of the supporting studies without any critical analysis. The SAA Report assessed the preferred development strategy against sustainability credentials based on the findings of the Objectively Assessment Housing Need - Further Evidence and the Inner Green Belt Review 2015, and then concluded that it would be unsustainable to release land from the Green Belt. That is not the end of the assessment process. A further stage of the assessment process should have considered whether the preferred development strategy would deliver sustainable development.

Change To Plan:

Legally Compliant?: Not Specified

Full Reference: O - 66154 - 21301 - 8. Green Belt in the SA - None

## 66220 Object

**Respondent:** North Barton Road Land Owners Group [21302]

**Agent:** Carter Jonas LLP (Brian Flynn) [17331]

Summary: The SAA Report appears to accept the findings of the supporting studies without any critical analysis. The SAA Report assessed the preferred development strategy against sustainability credentials based on the findings of the Objectively Assessment Housing Need - Further Evidence and the Inner Green Belt Review 2015, and then concluded that it would be unsustainable to release land from the Green Belt. That is not the end of the assessment process. A further stage of the assessment process should have considered whether the preferred development strategy would deliver sustainable development.

Relevant attachments:

-Jan Representations OAN (25.01.16).pdf

-North BRLOG LP Mods Jan 2016.pdf : Paragraph 81.pdf

Change To Plan:

Legally Compliant?: Not Specified

Full Reference: O - 66220 - 21302 - 8. Green Belt in the SA - None



66230 Support

Respondent: RLW Estates [1284]

Agent: Boyer Planning (Matthew Clarke) [9069]

Summary: Section 8 demonstrated, through reference to policy and wide range of relevant practice guidance, it is valid to give weight to impact on Green Belt as appropriate SA objective and this can be applied in filtering out sites when considering and assessing reasonable alternatives, as an exclusionary criteria.

Approach is rightly placed in context of conclusions of Cambridge Inner Green Belt Study 2015, broadly confirming significant harm would result from further releases from Green Belt in most locations.

Remains appropriate that new settlements form key part of development strategy in accordance with development sequence, and given capacity constraints within City, Green Belt constraints and advantages offered at new settlements (Waterbeach in particular).

Change To Plan:

Legally Compliant?: Not Specified

Full Reference: S - 66230 - 1284 - 8. Green Belt in the SA - None

**65325 Object**                      **Respondent:** Barratt Eastern Counties and the North West Cambridge Consortium of Landowners [17788]                      **Agent:**    BIDWELLS LLP (MISS MARCIA WHITEHEAD) [25328]

Summary: The Local Plans are not compliant with the SEA Regulations. The SEA process has not been adequate. The further evidence does not adequately address the issues raised by the Inspectors. The Plans don't achieve the 'right balance' across the development hierarchy. The Strategy remains over-reliant upon New Settlements. Whilst sustainable development options exist on the Edge of Cambridge and in Better Served Villages on the Edges of Cambridge, these options have been discounted at an early stage due to Green Belt considerations. This approach has precluded a proper assessment of the reasonable alternatives required by the SEA Regulations.

Change To Plan: Please see attached Critique of the Sustainability Appraisal Addendum

Legally Compliant?: No

Full Reference: O - 65325 - 17788 - 9. Preferred Approach - i, ii, iii, iv

**65543 Object**                      **Respondent:** Endurance Estates Limited [19174]                      **Agent:**    Bidwells LLP (Susan Chappell) [25316]

Summary: The Local Plans are not compliant with the SEA Regulations. The SEA process has not been adequate. The further evidence does not adequately address the issues raised by the Inspectors. The Plans don't achieve the 'right balance' across the development hierarchy. The Strategy remains over-reliant upon New Settlements. Whilst sustainable development options exist on the Edge of Cambridge and in Better Served Villages on the Edges of Cambridge, these options have been discounted at an early stage due to Green Belt considerations. This approach has precluded a proper assessment of the reasonable alternatives required by the SEA Regulations.

Change To Plan: Please see attached Critique of the Sustainability Appraisal Addendum.

Legally Compliant?: No

Full Reference: O - 65543 - 19174 - 9. Preferred Approach - i, iv

**65555 Object**                      **Respondent:** Pigeon Land & LIH [25320]                      **Agent:**    CODE Development Planners Ltd (Ms Karen Beech) [25295]

Summary: There are inconsistencies and disparities between the assessment of new settlements when compared to the assessment of urban fringes sites.

Relevant documents:160125\_CSTpt.pdf

Executive summary  
Section 1 - Introduction - para 1.1 to 1.6  
Section 2 - OAHN & Housing Delivery - section 2.2 - para 2.2.1 to 2.2.5  
Section 3 - Green Belt - para 3.1 to 3.10  
Section 4 - Overall Development Strategy - para 4.1 to 4.5  
Section 5 - Sustainability Appraisal - para 5.1 to 5.11  
Section 7 - Conclusions - para 7.1 to 7.6  
Appendix 2 - para 1.1 to 6.11 plus appendices  
Appendix 3 - para 1.1 to 5.6  
Appendix 4 - Executive summary, para 1.1 to 4.3

Change To Plan: \* Green Belt Study and SA Addendum Report to be revisited to ensure that a consistent approach is adopted for the consideration of all reasonable alternative urban edge sites;

\* Balance between weighting given to sustainability and weighting given to the protection of the Green Belt to be reviewed in order to deliver a sustainable development strategy.

Legally Compliant?: Yes

Full Reference: O - 65555 - 25320 - 9. Preferred Approach - i, ii, iii, iv

## 65616 Object

**Respondent: Pembroke College & the Balaam Family [21173]**

**Agent: Bidwells LLP (Susan Chappell) [25316]**

Summary: The Local Plans are not compliant with the SEA Regulations. The SEA process has not been adequate. The further evidence does not adequately address the issues raised by the Inspectors. The Plans don't achieve the 'right balance' across the development hierarchy. The Strategy remains over-reliant upon New Settlements. Whilst sustainable development options exist on the Edge of Cambridge and in Better Served Villages on the Edges of Cambridge, these options have been discounted at an early stage due to Green Belt considerations. This approach has precluded a proper assessment of the reasonable alternatives required by the SEA Regulations.

Change To Plan: Please see attached Critique of the Sustainability Appraisal Addendum.

Legally Compliant?: No

Full Reference: O - 65616 - 21173 - 9. Preferred Approach - i, iv

## 65628 Object

**Respondent: Bidwells (Miss Marcia Whitehead) [17324]**

**Agent: Bidwells LLP (Alison Barnes) [25318]**

Summary: The Local Plans are not compliant with the SEA Regulations. The SEA process has not been adequate. The further evidence does not adequately address the issues raised by the Inspectors. The Plans don't achieve the 'right balance' across the development hierarchy. The Strategy remains over-reliant upon New Settlements. Whilst sustainable development options exist on the Edge of Cambridge and in Better Served Villages on the Edges of Cambridge, these options have been discounted at an early stage due to Green Belt considerations. This approach has precluded a proper assessment of the reasonable alternatives required by the SEA Regulations.

Change To Plan: Please see attached Critique of the Sustainability Appraisal Addendum.

Legally Compliant?: No

Full Reference: O - 65628 - 17324 - 9. Preferred Approach - i, iv

## 65647 Object

**Respondent: Unwins and Biggs [25382]**

**Agent: Bidwells LLP (Alison Barnes) [25318]**

Summary: The Local Plans are not compliant with the SEA Regulations. The SEA process has not been adequate. The further evidence does not adequately address the issues raised by the Inspectors. The Plans don't achieve the 'right balance' across the development hierarchy. The Strategy remains over-reliant upon New Settlements. Whilst sustainable development options exist on the Edge of Cambridge and in Better Served Villages on the Edges of Cambridge, these options have been discounted at an early stage due to Green Belt considerations. This approach has precluded a proper assessment of the reasonable alternatives required by the SEA Regulations.

Change To Plan: Please see attached Critique of the Sustainability Appraisal Addendum.

Legally Compliant?: No

Full Reference: O - 65647 - 25382 - 9. Preferred Approach - i, iv

## 65658 Object

**Respondent: Emmanuel & Gonville & Caius [25384]**

**Agent: Bidwells LLP (Alison Barnes) [25318]**

Summary: The Local Plans are not compliant with the SEA Regulations. The SEA process has not been adequate. The further evidence does not adequately address the issues raised by the Inspectors. The Plans don't achieve the 'right balance' across the development hierarchy. The Strategy remains over-reliant upon New Settlements. Whilst sustainable development options exist on the Edge of Cambridge and in Better Served Villages on the Edges of Cambridge, these options have been discounted at an early stage due to Green Belt considerations. This approach has precluded a proper assessment of the reasonable alternatives required by the SEA Regulations.

Change To Plan: Please see attached Critique of the Sustainability Appraisal Addendum.

Legally Compliant?: No

Full Reference: O - 65658 - 25384 - 9. Preferred Approach - i, iv

## 66028 Object

**Respondent: Commercial Estates Group [17653]**

**Agent: Nathaniel Lichfield & Partners (Mr Matthew Spry) [20555]**

Summary: 3 key themes of SA require further review:

1. Updated evidence base on which SA Addendum has been based is significantly flawed and cannot be considered sound basis upon which robust analysis can be relied.
2. Revised appraisal adopts broad brush approach to dismissing large areas of land due to location of Green Belt despite Inner Green Belt Study acknowledging areas which are acknowledged as contributing significantly to sustainability objectives and less to Green Belt Objectives are capable of release. Rather, less sustainable choices have been made outside of urban area;
3. Consideration may need to be given to ensuring all policies of 2 Plans have been subject to consistent SA; particularly given Inspectors concerns.

Refer to accompanying Technical Paper: SA (Appendix 6).

Relevant Attachment  
Cambridge South East 1.4 Section 2(f) -SA (2.55-2.58) and  
Appendix 6(SA Review)

Change To Plan:

Legally Compliant?: No

Full Reference: O - 66028 - 17653 - 9. Preferred Approach - i, ii, iii

## 66179 Object

**Respondent: Great Shelford Ten Acres Limited [8948]**

**Agent: Bidwells (Mrs Stacey Rawlings) [3140]**

Summary: Land at Great Shelford (Ten Acres) forms Site 18 (SHLAA Site SC005) for the purposes of the Sustainability Appraisal, has been subject to the appraisal process. We disagree with the conclusions reached in respect of Landscape, Townscape and Cultural Heritage in respect of this site. Whilst the development of this site would, by virtue of development, result in some encroachment into the transitional area of fields, this could be appropriately mitigated. The Inner Green Belt Review (2015) sets out mitigation measures in order to minimise the impact on Green Belt Purposes. We concur with the parameters within 6.11.6 for Sub area 8.2. The study concludes that this area of land (which includes our Clients site) serves little purpose for the Green Belt and could be released without further harm. The Assessment of Site18 is therefore inaccurate and has not been updated to reflect the updated evidence base. Had this been actioned it would demonstrate that the site is suitable for development and sequentially preferable in delivering the spatial strategy under Policy S/1.

See attached documents:  
\* SA\_Approach.pdf  
\* Critique of the Councils' Sustainability Appraisal.pdf

Change To Plan:

Legally Compliant?: No

Full Reference: O - 66179 - 8948 - 9. Preferred Approach - None

**65369 Object**

**Respondent: Trumpington Residents Association (Andrew Roberts) [5312]**

**Agent: N/A**

Summary: The Trumpington Residents' Association objects to Tables 10.2-10.3 and policy E/1B. The policy is not justified, as the arguments about the importance of this land to the Green Belt given in the Inner Green Belt Review 2015 are flawed and the Council has failed to demonstrate that there are exceptional circumstances for the need for jobs at this location. The potential effect of the proposed policy will be much more negative on the Green Belt than stated in Table 10.3. The proposed mitigation and enhancement measures will not compensate for the loss of the site.

Change To Plan: Deletion of Policy E/1B, concerning development to the south of the Cambridge Biomedical Campus.

Legally Compliant?: Yes

Full Reference: O - 65369 - 5312 - 10. Proposed Modifications to the Plans - ii, iii, iv

**65635 Object**

**Respondent: Endurance Estates Limited [19174]**

**Agent: Bidwells LLP (Susan Chappell) [25316]**

Summary: The Local Plans are not compliant with the SEA Regulations. The SEA process has not been adequate. The further evidence does not adequately address the issues raised by the Inspectors. The Plans don't achieve the 'right balance' across the development hierarchy. The Strategy remains over-reliant upon New Settlements. Whilst sustainable development options exist on the Edge of Cambridge and in Better Served Villages on the Edges of Cambridge, these options have been discounted at an early stage due to Green Belt considerations. This approach has precluded a proper assessment of the reasonable alternatives required by the SEA Regulations.

Change To Plan: Please see attached Critique of the Sustainability Appraisal Addendum.

Legally Compliant?: No

Full Reference: O - 65635 - 19174 - 10. Proposed Modifications to the Plans - i, iv

**65636 Object**

**Respondent: Bidwells (Miss Marcia Whitehead) [17324]**

**Agent: Bidwells LLP (Alison Barnes) [25318]**

Summary: The Local Plans are not compliant with the SEA Regulations. The SEA process has not been adequate. The further evidence does not adequately address the issues raised by the Inspectors. The Plans don't achieve the 'right balance' across the development hierarchy. The Strategy remains over-reliant upon New Settlements. Whilst sustainable development options exist on the Edge of Cambridge and in Better Served Villages on the Edges of Cambridge, these options have been discounted at an early stage due to Green Belt considerations. This approach has precluded a proper assessment of the reasonable alternatives required by the SEA Regulations.

Change To Plan: Please see attached Critique of the Sustainability Appraisal Addendum.

Legally Compliant?: No

Full Reference: O - 65636 - 17324 - 10. Proposed Modifications to the Plans - i, iv

**65643 Object**

**Respondent: Emmanuel & Gonville & Caius [25384]**

**Agent: Bidwells LLP (Susan Chappell) [25316]**

Summary: The Local Plans are not compliant with the SEA Regulations. The SEA process has not been adequate. The further evidence does not adequately address the issues raised by the Inspectors. The Plans don't achieve the 'right balance' across the development hierarchy. The Strategy remains over-reliant upon New Settlements. Whilst sustainable development options exist on the Edge of Cambridge and in Better Served Villages on the Edges of Cambridge, these options have been discounted at an early stage due to Green Belt considerations. This approach has precluded a proper assessment of the reasonable alternatives required by the SEA Regulations.

Change To Plan: Please see attached Critique of the Sustainability Appraisal Addendum.

Legally Compliant?: No

Full Reference: O - 65643 - 25384 - 10. Proposed Modifications to the Plans - i, iv

**65651 Object**

**Respondent: Unwins and Biggs [25382]**

**Agent: Bidwells LLP (Alison Barnes) [25318]**

Summary: The Local Plans are not compliant with the SEA Regulations. The SEA process has not been adequate. The further evidence does not adequately address the issues raised by the Inspectors. The Plans don't achieve the 'right balance' across the development hierarchy. The Strategy remains over-reliant upon New Settlements. Whilst sustainable development options exist on the Edge of Cambridge and in Better Served Villages on the Edges of Cambridge, these options have been discounted at an early stage due to Green Belt considerations. This approach has precluded a proper assessment of the reasonable alternatives required by the SEA Regulations.

Change To Plan: Please see attached Critique of the Sustainability Appraisal Addendum.

Legally Compliant?: No

Full Reference: O - 65651 - 25382 - 10. Proposed Modifications to the Plans - i, iv

## 65662 Object

**Respondent: Emmanuel & Gonville & Caius [25384]**

**Agent: Bidwells LLP (Alison Barnes) [25318]**

Summary: The Local Plans are not compliant with the SEA Regulations. The SEA process has not been adequate. The further evidence does not adequately address the issues raised by the Inspectors. The Plans don't achieve the 'right balance' across the development hierarchy. The Strategy remains over-reliant upon New Settlements. Whilst sustainable development options exist on the Edge of Cambridge and in Better Served Villages on the Edges of Cambridge, these options have been discounted at an early stage due to Green Belt considerations. This approach has precluded a proper assessment of the reasonable alternatives required by the SEA Regulations.

Change To Plan: Please see attached Critique of the Sustainability Appraisal Addendum.

Legally Compliant?: No

Full Reference: O - 65662 - 25384 - 10. Proposed Modifications to the Plans - i, iv

## 65668 Object

**Respondent: Emmanuel & Gonville & Caius [25384]**

**Agent: Bidwells LLP (Susan Chappell) [25316]**

Summary: The Local Plans are not compliant with the SEA Regulations. The SEA process has not been adequate. The further evidence does not adequately address the issues raised by the Inspectors. The Plans don't achieve the 'right balance' across the development hierarchy. The Strategy remains over-reliant upon New Settlements. Whilst sustainable development options exist on the Edge of Cambridge and in Better Served Villages on the Edges of Cambridge, these options have been discounted at an early stage due to Green Belt considerations. This approach has precluded a proper assessment of the reasonable alternatives required by the SEA Regulations.

Change To Plan: Please see attached Critique of the Sustainability Appraisal Addendum.

Legally Compliant?: No

Full Reference: O - 65668 - 25384 - 10. Proposed Modifications to the Plans - i, iv

## 65970 Support

**Respondent: Natural England (Ms Gail Hopkins) [25046]**

**Agent: N/A**

Summary: For the Cambridge City Local Plan, the SAAR suggests that the effect of the policies could be strengthened through a greater focus on the wider ecological network of the city. Natural England supports this recommendation and advises that relevant policies should be strengthened to require development to deliver multifunctional benefits, including biodiversity enhancements.

With the Proposed Modifications in place, the SAAR considers that the plans will continue to have an adverse impact on best and most versatile land due to the unavoidable loss of agricultural land. Our advice is that relevant policies should have regard to NPPF and require that proposals will seek to use areas of poorer quality land in preference to that of high quality, wherever possible.

Natural England accepts that in the absence of suitable alternative sites for large scale development loss of best and most versatile land is inevitable. However, we believe the plan should acknowledge this and a suitable policy should be included.

Change To Plan:

Legally Compliant?: Not Specified

Full Reference: S - 65970 - 25046 - 10. Proposed Modifications to the Plans - None

## 66092 Support

**Respondent: Cambridgeshire County Council - Strategic Assets Team [25478]**

**Agent: Carter Jonas LLP (Brian Flynn) [17331]**

Summary: Chapter 10 pgs 155 to 163 + table 10.3

We agree with the assessment of the site and the conclusion that the site could be released from the Green Belt and allocated for development. Policy E/1B contains a series of parameters to guide the form and content of development at the site, including matters such as landscape impact, the landscape setting for the Nine Wells Local Nature Reserve, and flood risk and surface water drainage.

Relevant attachments:

-36873\_FloodRiskConstraints&OpportunitiesReport.pdf

-Commercial Edge Cambridge - 2014.pdf

-22 01 16 Cambs County Council - Policy E1B LP Mods Reps Jan 2016.pdf: (Paragraphs 19 - 22)

Change To Plan:

Legally Compliant?: Not Specified

Full Reference: S - 66092 - 25478 - 10. Proposed Modifications to the Plans - None

**65637 Object**

**Respondent:** Endurance Estates Limited [19174]

**Agent:** Bidwells LLP (Susan Chappell) [25316]

Summary: The Local Plans are not compliant with the SEA Regulations. The SEA process has not been adequate. The further evidence does not adequately address the issues raised by the Inspectors. The Plans don't achieve the 'right balance' across the development hierarchy. The Strategy remains over-reliant upon New Settlements. Whilst sustainable development options exist on the Edge of Cambridge and in Better Served Villages on the Edges of Cambridge, these options have been discounted at an early stage due to Green Belt considerations. This approach has precluded a proper assessment of the reasonable alternatives required by the SEA Regulations.

Change To Plan: Please see attached Critique of the Sustainability Appraisal Addendum.

Legally Compliant?: No

Full Reference: O - 65637 - 19174 - 11. Consultation and Next Steps - i, iv

**65645 Object**

**Respondent:** Emmanuel & Gonville & Caius [25384]

**Agent:** Bidwells LLP (Susan Chappell) [25316]

Summary: The Local Plans are not compliant with the SEA Regulations. The SEA process has not been adequate. The further evidence does not adequately address the issues raised by the Inspectors. The Plans don't achieve the 'right balance' across the development hierarchy. The Strategy remains over-reliant upon New Settlements. Whilst sustainable development options exist on the Edge of Cambridge and in Better Served Villages on the Edges of Cambridge, these options have been discounted at an early stage due to Green Belt considerations. This approach has precluded a proper assessment of the reasonable alternatives required by the SEA Regulations.

Change To Plan: Please see attached Critique of the Sustainability Appraisal Addendum.

Legally Compliant?: No

Full Reference: O - 65645 - 25384 - 11. Consultation and Next Steps - i, iv

**65653 Object**

**Respondent:** Unwins and Biggs [25382]

**Agent:** Bidwells LLP (Alison Barnes) [25318]

Summary: The Local Plans are not compliant with the SEA Regulations. The SEA process has not been adequate. The further evidence does not adequately address the issues raised by the Inspectors. The Plans don't achieve the 'right balance' across the development hierarchy. The Strategy remains over-reliant upon New Settlements. Whilst sustainable development options exist on the Edge of Cambridge and in Better Served Villages on the Edges of Cambridge, these options have been discounted at an early stage due to Green Belt considerations. This approach has precluded a proper assessment of the reasonable alternatives required by the SEA Regulations.

Change To Plan: Please see attached Critique of the Sustainability Appraisal Addendum.

Legally Compliant?: No

Full Reference: O - 65653 - 25382 - 11. Consultation and Next Steps - i, iv

**65663 Object**

**Respondent:** Emmanuel & Gonville & Caius [25384]

**Agent:** Bidwells LLP (Alison Barnes) [25318]

Summary: The Local Plans are not compliant with the SEA Regulations. The SEA process has not been adequate. The further evidence does not adequately address the issues raised by the Inspectors. The Plans don't achieve the 'right balance' across the development hierarchy. The Strategy remains over-reliant upon New Settlements. Whilst sustainable development options exist on the Edge of Cambridge and in Better Served Villages on the Edges of Cambridge, these options have been discounted at an early stage due to Green Belt considerations. This approach has precluded a proper assessment of the reasonable alternatives required by the SEA Regulations.

Change To Plan: Please see attached Critique of the Sustainability Appraisal Addendum.

Legally Compliant?: No

Full Reference: O - 65663 - 25384 - 11. Consultation and Next Steps - i, iv

**65671 Object**

**Respondent:** Emmanuel & Gonville & Caius [25384]

**Agent:** Bidwells LLP (Susan Chappell) [25316]

Summary: The Local Plans are not compliant with the SEA Regulations. The SEA process has not been adequate. The further evidence does not adequately address the issues raised by the Inspectors. The Plans don't achieve the 'right balance' across the development hierarchy. The Strategy remains over-reliant upon New Settlements. Whilst sustainable development options exist on the Edge of Cambridge and in Better Served Villages on the Edges of Cambridge, these options have been discounted at an early stage due to Green Belt considerations. This approach has precluded a proper assessment of the reasonable alternatives required by the SEA Regulations.

Change To Plan: Please see attached Critique of the Sustainability Appraisal Addendum.

Legally Compliant?: No

Full Reference: O - 65671 - 25384 - 11. Consultation and Next Steps - None

65670 Object

Respondent: Emmanuel & Gonville & Caius [25384]

Agent: Bidwells LLP (Susan Chappell) [25316]

Summary: The Local Plans are not compliant with the SEA Regulations. The SEA process has not been adequate. The further evidence does not adequately address the issues raised by the Inspectors. The Plans don't achieve the 'right balance' across the development hierarchy. The Strategy remains over-reliant upon New Settlements. Whilst sustainable development options exist on the Edge of Cambridge and in Better Served Villages on the Edges of Cambridge, these options have been discounted at an early stage due to Green Belt considerations. This approach has precluded a proper assessment of the reasonable alternatives required by the SEA Regulations.

Change To Plan: Please see attached Critique of the Sustainability Appraisal Addendum.

Legally Compliant?: No

Full Reference: O - 65670 - 25384 - Appendix 1. Authorship of the Report - i, iv

65755 Object

Respondent: Coalition of Parish Councils (Mr Steve Jones) [25442]

Agent: N/A

Summary: In Table 2 of the supporting document we have extracted key information from the Sustainability Analysis on two site options to illustrate how much more sustainable edge of city sites are than new settlements. The two options used are:  
\* Option 2: Bourn Airfield New Settlement and Village Focus  
\* Option 6: Edge of Cambridge and Village Focus

Table 2 shows clearly, using the Councils own information, that edge of city sites are more sustainable and cost-effective than new settlements.

The score for Bourn Airfield's is incorrect. Given that two-thirds of commuters from Bourn Airfield would have to travel to work by car and drive 20-30 miles a day, it cannot be argued that a new settlement at Bourn Airfield supports the Council's Sustainable Transport objective. Bourn Airfield should be scored: Potentially significant adverse impact which conflicts with the objective.

Paragraphs 21 to 28 and table 2 of supporting document.

Change To Plan: Amend modification due to reasons set out above.

Legally Compliant?: Not Specified

Full Reference: O - 65755 - 25442 - Appendix 6. Joint Site Assessment Proforma - i, iii



**65569 Object**                      **Respondent: Pigeon Land & LIH [25320]**                      **Agent: CODE Development Planners Ltd (Ms Karen Beech) [25295]**

Summary: There are inconsistencies when looking at the assessment of individual urban fringe sites, such as Cambridge South.

We have prepared an updated assessment for the Cambridge South site to rectify these inconsistencies. When compared to the assessment carried out for the provisional extension to CBC, the Cambridge South site has less red scores (one less), less amber scores (6 less) and more light and dark green scores (7 more).

Relevant documents:160125\_CSTpt.pdf

Executive summary  
Section 1 - Introduction - para 1.1 to 1.6  
Section 2 - OAHN & Housing Delivery - section 2.2 - para 2.2.1 to 2.2.5  
Section 3 - Green Belt - para 3.1 to 3.10  
Section 4 - Overall Development Strategy - para 4.1 to 4.5  
Section 5 - Sustainability Appraisal - para 5.1 to 5.11  
Section 7 - Conclusions - para 7.1 to 7.6  
Appendix 2 - para 1.1 to 6.11 plus appendices  
Appendix 3 - para 1.1 to 5.6  
Appendix 4 - Executive summary, para 1.1 to 4.3

Change To Plan: Green Belt Study and SA Addendum Report to be revisited to ensure that a consistent approach is adopted for the consideration of all reasonable alternative urban edge sites;

Legally Compliant?: Yes

Full Reference: O - 65569 - 25320 - Appendix 7. Site Appraisals - Edge of Cambridge - i, ii, iii, iv

**65946 Object**                      **Respondent: The Quay Estate [25458]**                      **Agent: Carter Jonas LLP (Mr Richard Seamark) [15727]**

Summary: Table 7.2 shows that the most sustainable development will be acheived on Edge of Cambridge Sites.

We challenge how the scoring has been applied in the table (see suuporting document).

The modal share results hide the fact that these locations are in already congested areas of the city where there is little scope to create more capacity for more cars, forcing new trips to be undertaken by active modes'. The CSRm report identifies (Figure 5.11), the greater distance away from Cambridge (of the New Settlements) will result in higher levels of car use. Mitigation through increased public transport options is an illogical approach.

Change To Plan: The most sustainable development will be acheived on Edge of Cambridge Sites. There is a compelling case for more EoC sites playing a leading role in the spatial strategy, and that the current strategy arrived at by the Councils is unsound.

Legally Compliant?: Not Specified

Full Reference: O - 65946 - 25458 - Appendix 7. Site Appraisals - Edge of Cambridge - i, ii

65848 Object

**Respondent:** CALA Homes (North Homes Counties) Ltd [25454]

**Agent:** Carter Jonas LLP (Brian Flynn) [17331]

Summary: The SAA Report does not assess land off Highfields Road in Caldecote because the Council decided not to allocate land within Group Villages, except for the parish council-led allocations. As such, the sustainability credentials of our client's site have never been assessed.

Our concerns at this stage are that the SAA Report has not assessed development in Group Villages or the potential of Group Villages to provide small and medium sized sites to maintain and increase the housing land supply. There is no evidence to support or explain the decision to reject development at Group Villages or at specific sites within some Group Villages.

We set out the site factors which indicate that land off Highfields Road in Caldecote should have been assessed and identified as having development potential.

Change To Plan:

Legally Compliant?: Not Specified

Full Reference: O - 65848 - 25454 - Annex 1. Site Assessment Proformas and Summary Results - Introduction, Maps & Site List, Sites in the Cambridge Urban Area - None

66022 Object

**Respondent:** Commercial Estates Group [17653]

**Agent:** Nathaniel Lichfield & Partners (Mr Matthew Spry) [20555]

Summary: CEG objects to elements of the Sustainability Appraisal Addendum, including the assessment of SA Site CCSC1005 (Broad Location 7/Cambridge South East).

Please refer to accompanying Technical Paper: SA (Appendix 6 to CEG Representations) for detailed representations.

Relevant Attachment  
Cambridge South East 1.4 Section 2(f) -SA (2.55-2.58) and  
Appendix 6(SA Review)

Change To Plan:

Legally Compliant?: No

Full Reference: O - 66022 - 17653 - Annex 1. Site Assessment Proformas and Summary Results - Introduction, Maps & Site List, Sites in the Cambridge Urban Area - i, ii, iii

65371 Object

Respondent: Trumpington Residents Association (Andrew Roberts) [5312] Agent: N/A

Summary: The Trumpington Residents' Association objects to the assessment of site E/1B. The consultants have fundamentally misjudged the importance of this area to the Green Belt. The extension of the Cambridge Biomedical Campus into this site would cause significant harm to Green Belt purposes. The site provides a key buffer between the already approved site of the Cambridge Biomedical Campus and the countryside, including the important adjacent area of Nine Wells.

The Trumpington Residents' Association supports the assessment of sites CCSC1004, CC904 and CCSC1003, where development would have had a significant negative impact on landscape and townscape and Green Belt purposes.

Relevant reference document - RD/MC/020 - Sustainability Appraisal - Annex 1 Volume 1 of printed copy. Page Numbers:  
Site E/1B: 368-376  
Site CCSC1004: 419-437  
Site CC904: 214-222  
Site CCSC1003: 408-418

Change To Plan: Revised assessment of site E/1B, concerning development to the south of the Cambridge Biomedical Campus.

Legally Compliant?: Yes

Full Reference: O - 65371 - 5312 - Annex 1. Site Assessment Proformas and Summary Results - Sites on the Edge of Cambridge - i, ii, iv

65567 Object

Respondent: Barratt Eastern Counties and the North West Cambridge Consortium of Landowners [17788] Agent: BIDWELLS LLP (MISS MARCIA WHITEHEAD) [25328]

Summary: The Landscape Agency carried out a review of the "Cambridge Inner Green Belt Boundary Study" (November 2015) to consider whether additional land on the north-west side of Cambridge, between Huntingdon Road and Histon Road, could be released from the Green Belt.

The Landscape Agency consider additional development could be accommodated without adversely affecting the purpose of the Green Belt. There would be no major additional impact on the rural character and a landscape buffer would be retained along the A14, providing a soft urban edge. The open setting to Girton and separation between the village and Cambridge would be retained.

Change To Plan: The Local Plan should be amended to reflect an enlarged allocation of land for development between Histon Road and Huntingdon Road as detailed within the report.

Legally Compliant?: No

Full Reference: O - 65567 - 17788 - Annex 1. Site Assessment Proformas and Summary Results - Sites on the Edge of Cambridge - i, ii, iv

## 65577 Object

**Respondent: Pigeon Land & LIH [25320]**

**Agent: CODE Development Planners Ltd (Ms Karen Beech) [25295]**

Summary: There are inconsistencies and disparities between the assessment of new settlements when compared to the assessment of urban fringe sites.

Relevant documents:160125\_CSTpt.pdf

Executive summary

Section 1 - Introduction - para 1.1 to 1.6

Section 2 - OAHN & Housing Delivery - section 2.2 - para 2.2.1 to 2.2.5

Section 3 - Green Belt - para 3.1 to 3.10

Section 4 - Overall Development Strategy - para 4.1 to 4.5

Section 5 - Sustainability Appraisal - para 5.1 to 5.11

Section 7 - Conclusions - para 7.1 to 7.6

Appendix 2 - para 1.1 to 6.11 plus appendices

Appendix 3 - para 1.1 to 5.6

Appendix 4 - Executive summary, para 1.1 to 4.3

Change To Plan: Green Belt Study and SA Addendum Report to be revisited to ensure that a consistent approach is adopted for the consideration of all reasonable alternative urban edge sites.

Balance between weighting given to sustainability and weighting given to the protection of the Green Belt to be reviewed in order to deliver a sustainable development strategy.

Legally Compliant?: Yes

Full Reference: O - 65577 - 25320 - Annex 1. Site Assessment Proformas and Summary Results - Sites on the Edge of Cambridge - i, ii, iii, iv

## 65948 Object

**Respondent: The Quay Estate [25458]**

**Agent: Carter Jonas LLP (Mr Richard Seamark) [15727]**

Summary: Site Number CCSC1006 - Land at Fen Ditton: page 446 to 457 of Annex1, Volume 1 of the Sustainability Appraisal Addendum (RD/MC/020 printed version).

Disagree with assessment of the site and scores (see attached document) and seek adjustments to the assessment of:

AQMA

Contamination,

Biodiversity

Landscape

Townscape

Green Belt

Heritage

Distance (from Local Centres, GPS, Schools and Railway Station)

Integration

Employment

Cycle Routes.

Accordingly, we believe the Councils' SAAR has underscored the sustainability credentials of the Site, and consider that the revised scoring strengthens the case for allocation of the Site for residential development.

Change To Plan:

Legally Compliant?: Not Specified

Full Reference: O - 65948 - 25458 - Annex 1. Site Assessment Proformas and Summary Results - Sites on the Edge of Cambridge - i, ii

66023 Object

Respondent: Commercial Estates Group [17653]

Agent: Nathaniel Lichfield & Partners (Mr Matthew Spry) [20555]

Summary: CEG objects to elements of the Sustainability Appraisal Addendum, including the assessment of SA Site SC300 (Fulbourn Road/LP Site E/2)

Please refer to accompanying Technical Paper: SA (Appendix 6 to CEG Representations) for detailed representations.

Relevant Attachment  
Cambridge South East 1.4 Section 2(f) -SA (2.55-2.58) and  
Appendix 6(SA Review)

Change To Plan:

Legally Compliant?: No

Full Reference: O - 66023 - 17653 - Annex 1. Site Assessment Proformas and Summary Results - Sites on the Edge of Cambridge - i, ii, iii

66036 Object

Respondent: St Johns College [3084]

Agent: Savills (Mr Garth Hanlon) [963]

Summary: Grange Farm site (Site CC916)  
Not considered that Councils' assessment of site in SA Addendum is a fair and accurate assessment of site's development potential. Is not a true representation of sustainable credentials of the site, particularly when comparing it to sites outside of Cambridge. Locating development on edge of Cambridge has significant advantages.

Have prepared their own assessment of their site using SAA criteria.

Change To Plan:

Legally Compliant?: Not Specified

Full Reference: O - 66036 - 3084 - Annex 1. Site Assessment Proformas and Summary Results - Sites on the Edge of Cambridge - i, iii

66117 Object

Respondent: Grosvenor Developments Ltd and USS [25482]

Agent: Savills (Mr Colin Campbell) [15804]

Summary: The SA of Broad location 4 is considered to contain a number of inaccurate and incorrect assessments, including:

- \* AQMA
- \* Landscape
- \* Townscape
- \* Green Belt
- \* Renewables
- \* Utilities
- \* Cycle
- \* HQPT
- \* Access
- \* Non-car facilities

Corrections to the scorings are set out in the full response.

Change To Plan: Delete modification

Legally Compliant?: Not Specified

Full Reference: O - 66117 - 25482 - Annex 1. Site Assessment Proformas and Summary Results - Sites on the Edge of Cambridge - ii, iii

## 66120 Object

**Respondent: Ely Diocesan Board of Finance [3062]**

**Agent: Carter Jonas LLP (Brian Flynn) [17331]**

Summary: Site SC036 - Land east of Horningsea Road, Fen Ditton. Pages 335-344 of Annex 1 (Volume 1) of the Sustainability Appraisal (RD/MC/020 - Printed copy).

We request that the site is released from the Green Belt and allocated for development or identified as safeguarded land to meet long term development needs.

Relevant attachments:

\*66120.pdf. Relevant paragraphs: 43.

\*66120 - Appendix.pdf

Change To Plan:

Legally Compliant?: Not Specified

Full Reference: O - 66120 - 3062 - Annex 1. Site Assessment Proformas and Summary Results - Sites on the Edge of Cambridge - None

## 66138 Object

**Respondent: Cambridgeshire County Council - Strategic Assets Team [25478]**

**Agent: Carter Jonas LLP (Brian Flynn) [17331]**

Summary: Site CCSC1005 - Cambridge South East Land between Babraham Road and Fulbourn Road (Broad Location 7). Pages 433-445 of Annex 1 (Volume 1) of the Sustainability Appraisal (RD/MC/020 - Printed copy).

\*The air quality, noise and pollution matters need to be investigated in more detail;

\*The existing nature conservation interest at the site and in the surrounding area would be protected, retained and enhanced as part of development;

\*The landscape, townscape and Green Belt impacts could be addressed through strategic landscaping and green infrastructure measures;

\*The Green Belt score is incorrect and classed as the over-riding factor in decisions regardless of other sustainability outcomes;

\*The impact of development on the archaeological interest can be addressed prior to development;

\*The site is not at risk of flooding, and mitigation measures can be provided;

\*The site is accessible by public transport and cycling, and improvements to public transport would be implemented.

Relevant paragraphs in supporting document: 41 to 42.

Change To Plan:

Legally Compliant?: Not Specified

Full Reference: O - 66138 - 25478 - Annex 1. Site Assessment Proformas and Summary Results - Sites on the Edge of Cambridge - None

## 66156 Object

**Respondent: South Barton Road Land Owners Group [21301]**

**Agent: Carter Jonas LLP (Brian Flynn) [17331]**

Summary: Site CCSC1002 - Land South of Barton Road (Broad Location 1 - Land South of Barton Road. Pages 396-407. of Annex 1 (Volume 1) of the Sustainability Appraisal (RD/MC/020 - Printed copy).

We request that the site is released from the Green Belt and allocated for development or identified as safeguarded land to meet long term development needs.

We disagree with the findings of the site assessment with regard to:

\*Air Quality

\*Ecology

\*Landscape

\*Green Belt

\*Employment links

\*Sustainable transport options

\*Provision of community facilities

\*The lack of inclusion of City Deal Projects.

Change To Plan:

Legally Compliant?: Not Specified

Full Reference: O - 66156 - 21301 - Annex 1. Site Assessment Proformas and Summary Results - Sites on the Edge of Cambridge - None

66222 Object

Respondent: North Barton Road Land Owners Group [21302]

Agent: Carter Jonas LLP (Brian Flynn) [17331]

Summary: Site CCSC1001 - Name of Site. Pages 384-395. of Annex 1 (Volume 1) of the Sustainability Appraisal (RD/MC/020 - Printed copy).

Relevant attachments:

-Jan Representations OAN (25.01.16).pdf

-North BRLOG LP Mods Jan 2016.pdf : Paragraphs 88 to 97.pdf

Change To Plan:

Legally Compliant?: Not Specified

Full Reference: O - 66222 - 21302 - Annex 1. Site Assessment Proformas and Summary Results - Sites on the Edge of Cambridge - None

65448 Support

Respondent: Endurance Estates and Marshall Group Property [25444]

Agent: LDA Design (Mr Jon Alsop) [25196]

Summary: Joint Representation by Endurance Estates Ltd. and Marshall Group Properties Ltd.  
Comment

We note the generally positive Sustainability Appraisal scoring for sites R47 and SS/3 1b), but that there are 'red' scores recorded against:

- 1) The loss of Grade 2 agricultural land (based on broadly drawn 1970's MAFF mapping);
- 2)The distance from the City Centre;
- 3)The distance from the existing GP surgery; and
- 4) The distance from the existing rail transport hub

The land owners consider that these red scores and amber scores within the assessment could be mitigated and that the sites should therefore be positively assessed as part of the joint Local Plan and their role in providing a suitable supply of housing land and should be found sound. On this basis the landowners are supportive of the Sustainability Appraisal Addendum Report.

Change To Plan:

Legally Compliant?: Not Specified

Full Reference: S - 65448 - 25444 - Annex 1. Site Assessment Proformas and Summary Results - Sites on the Edge of Cambridge - None

**65596 Object**

**Respondent: Pigeon Land & LIH [25320]**

**Agent: CODE Development Planners Ltd (Ms Karen Beech) [25295]**

Summary: There are inconsistencies and disparities between the assessment of new settlements when compared to the assessment of urban fringes sites.

Relevant documents:160125\_CSTpt.pdf

Executive summary

Section 1 - Introduction - para 1.1 to 1.6

Section 2 - OAHN & Housing Delivery - section 2.2 - para 2.2.1 to 2.2.5

Section 3 - Green Belt - para 3.1 to 3.10

Section 4 - Overall Development Strategy - para 4.1 to 4.5

Section 5 - Sustainability Appraisal - para 5.1 to 5.11

Section 7 - Conclusions - para 7.1 to 7.6

Appendix 2 - para 1.1 to 6.11 plus appendices

Appendix 3 - para 1.1 to 5.6

Appendix 4 - Executive summary, para 1.1 to 4.3

Change To Plan: \* Green Belt Study and SA Addendum Report to be revisited to ensure that a consistent approach is adopted for the consideration of all reasonable alternative urban edge sites.

\* Balance between weighting given to sustainability and weighting given to the protection of the Green Belt to be reviewed in order to deliver a sustainable development strategy.

Legally Compliant?: Yes

Full Reference: O - 65596 - 25320 - Annex 1. Site Assessment Proformas and Summary Results - Sites at New Settlements and Rural Centres (Part 1) - i, ii, iii, iv

**65780 Object**

**Respondent: Mr Jonathan Burrell [22509]**

**Agent: N/A**

Summary: Councils haven't considered Bourn Airfield and West Cambourne fairly regarding Sustainability.

Environmental sustainability has been mainly tested on each site's effect on Green Belt rather than locality. Tests should be applied equally.

Both sites would bring urban sprawl along A428 insufficiently separated from themselves, Caxton and Caldecote and generating additional traffic detrimental to neighbouring villages.

Will not be self contained are 10 miles from nearest major employment/key services. However SA Annex 1 (Part 3) shows employment accessibility as Green, less than 1km, not properly reflected in sustainability comparisons. Most commuting likely by car. Improving one bus link will not be enough to mitigate this as multiple commute directions, mostly over 10m. Sustainable Transport Score does not reflect this.

Change To Plan:

Legally Compliant?: Not Specified

Full Reference: O - 65780 - 22509 - Annex 1. Site Assessment Proformas and Summary Results - Sites at New Settlements and Rural Centres (Part 1) - i, ii, iii, iv

**65822 Object**

**Respondent: Mrs Janice Burrell [3289]**

**Agent: N/A**

Summary: Councils haven't considered Bourn Airfield and West Cambourne fairly regarding Sustainability.

Environmental sustainability has been mainly tested on each site's effect on Green Belt rather than locality. Tests should be applied equally.

Both sites would bring urban sprawl along A428 insufficiently separated from themselves, Caxton and Caldecote and generating additional traffic detrimental to neighbouring villages.

Will not be self contained are 10 miles from nearest major employment/key services. However SA Annex 1 (Part 3) shows employment accessibility as Green, less than 1km, not properly reflected in sustainability comparisons. Most commuting likely by car. Improving one bus link will not be enough to mitigate this as multiple commute directions, mostly over 10m. Sustainable Transport Score does not reflect this.

Change To Plan:

Legally Compliant?: Not Specified

Full Reference: O - 65822 - 3289 - Annex 1. Site Assessment Proformas and Summary Results - Sites at New Settlements and Rural Centres (Part 1) - None



**65828 Object**

**Respondent:** The Taylor Family & Countryside Properties (UK) Ltd [19841]

**Agent:** Andrew Martin - Planning Limited (Mr Andrew Martin) [16509]

Summary: Proposals for Bourn Airfield conform with the proposed development strategy for South Cambridgeshire. We propose some amendment to the site information referred to in Annex 1.

Agricultural Land Classification - it is incorrect to say that the majority of the site is grade 2 as survey work undertaken in the past confirmed that only 7% of the site was grade 2.

About three quarters of the agricultural land in use at the airfield is not realising its agricultural potential due to a lack of drainage measures or previous soil disturbance.

Change To Plan:

Legally Compliant?: Not Specified

Full Reference: O - 65828 - 19841 - Annex 1. Site Assessment Proformas and Summary Results - Sites at New Settlements and Rural Centres (Part 1) - None

**66038 Object**

**Respondent:** Martin Grant Homes Ltd & Harcourt Developments (UK) Ltd [21709]

**Agent:** Savills (Mr Andrew Raven) [18884]

Summary: Annex 1: The current Sites Assessment contains illogical and perverse assessments of North Cambourne when compared with Bourn Airfield. We have consistently identified this inconsistency in the way the two Councils have appraised the sites, which gives the appearance of a post-hoc justification for the site selection that the Councils have made rather than a true assessment of their relative merits. The Proposed Modifications and Sustainability Assessment Addendum do not remedy the failings of the Assessment and the changes noted are required in order to fairly demonstrate that a development on land north of Cambourne is far more sustainable than a similar scale of development at Bourn Airfield.

Change To Plan:

Legally Compliant?: No

Full Reference: O - 66038 - 21709 - Annex 1. Site Assessment Proformas and Summary Results - Sites at New Settlements and Rural Centres (Part 1) - i, ii, iii, iv

65823 Object

**Respondent:** Mrs Janice Burrell [3289]

**Agent:** N/A

Summary: Councils haven't considered Bourn Airfield and West Cambourne fairly regarding Sustainability. Environmental sustainability has been mainly tested on each site's effect on Green Belt rather than locality. Tests should be applied equally. Both sites would bring urban sprawl along A428 insufficiently separated from themselves, Caxton and Caldecote and generating additional traffic detrimental to neighbouring villages. Will not be self contained are 10 miles from nearest major employment/key services. However SA Annex 1 (Part 3) shows employment accessibility as Green, less than 1km, not properly reflected in sustainability comparisons. Most commuting likely by car. Improving one bus link will not be enough to mitigate this as multiple commute directions, mostly over 10m. Sustainable Transport Score does not reflect this.

Change To Plan:

Legally Compliant?: Not Specified

Full Reference: O - 65823 - 3289 - Annex 1. Site Assessment Proformas and Summary Results - Sites at Rural Centres (Part 3) - None

65826 Object

**Respondent:** Mr Jonathan Burrell [22509]

**Agent:** N/A

Summary: Councils haven't considered Bourn Airfield and West Cambourne fairly regarding Sustainability. Environmental sustainability has been mainly tested on each site's effect on Green Belt rather than locality. Tests should be applied equally. Both sites would bring urban sprawl along A428 insufficiently separated from themselves, Caxton and Caldecote and generating additional traffic detrimental to neighbouring villages. Will not be self contained are 10 miles from nearest major employment/key services. However SA Annex 1 (Part 3) shows employment accessibility as Green, less than 1km, not properly reflected in sustainability comparisons. Most commuting likely by car. Improving one bus link will not be enough to mitigate this as multiple commute directions, mostly over 10m. Sustainable Transport Score does not reflect this.

Change To Plan:

Legally Compliant?: Not Specified

Full Reference: O - 65826 - 22509 - Annex 1. Site Assessment Proformas and Summary Results - Sites at Rural Centres (Part 3) - i, ii, iii, iv

66165 Object

**Respondent:** Shelford Investments Ltd [21149]

**Agent:** Carter Jonas LLP (Brian Flynn) [17331]

Summary: Site SC188 - Land South of Barton Road (Broad Location 1 - Land South of Barton Road. Pages 870-876. of Annex 1 (Volume 3) of the Sustainability Appraisal (RD/MC/020 - Printed copy).

Disagree of the assessment of the site for the following reasons:  
\*It would have no adverse impact on the compactness or setting of Cambridge, or lead to the merging of villages. \*It makes a limited contribution to the Green Belt, and is scored as 'Amber' in the assessment process.  
\*Landscape improvements could be undertaken to protect the special character of Cambridge and its setting.  
Further technical studies of the site are required, particularly on transport, archaeology, noise and ecology..

Change To Plan:

Legally Compliant?: Not Specified

Full Reference: O - 66165 - 21149 - Annex 1. Site Assessment Proformas and Summary Results - Sites at Rural Centres (Part 3) - None

66187 Object

Respondent: Histon & Impington Parish Council (Ms Chelsea Presland) [20953]

Agent: N/A

Summary: Buxhall Farm SC133

Misinformation - Proposed use: "Residential-led mixed use development of approximately 400 dwellings with a range of non-residential uses including employment, retail, commercial uses and community uses that complement the scale of residential development proposed whilst also serving the existing local community, e.g. a new primary school and a new community facility." - discussion with the applicant (Stephen Conrad, Cambridgeshire County Council) on January 8th confirmed that the intended development, should the site come forward, would solely be housing, and possibly a primary school - but none of the other uses suggested. It is deeply concerning that this level of error/misinformation has been introduced.

Change To Plan:

Legally Compliant?: Not Specified

Full Reference: O - 66187 - 20953 - Annex 1. Site Assessment Proformas and Summary Results - Sites at Rural Centres (Part 3) - None

66188 Object

Respondent: Histon & Impington Parish Council (Ms Chelsea Presland) [20953]

Agent: N/A

Summary: SC114

Misclassification - exactly the same description of flood risk as SC112, though it is to the east of it.

Change To Plan:

Legally Compliant?: Not Specified

Full Reference: O - 66188 - 20953 - Annex 1. Site Assessment Proformas and Summary Results - Sites at Rural Centres (Part 3) - None

CHAPTER: Sustainability Appraisal  
Addendum Report

Annex 1. Site Assessment Proformas and Summary Results - Sites at Rural Centres (Part 2)

65859 Object

Respondent: Mr C Meadows [21155]

Agent: Carter Jonas LLP (Brian Flynn) [17331]

Summary: The assessment of land west of 113 Cottenham Road, Histon identifies impacts on landscape and Green Belt, and that the existing vehicular access is inadequate. We disagree.

The woodland area on the western part of the site would be retained, which means that development at the site would not be visible from the surrounding landscape. The site makes a limited contribution to the purposes of the Green Belt, and is scored as 'Amber'. Landscape improvements could be undertaken which would protect the factors that define the special character of Cambridge and its setting.

It would be possible to create a new access if the existing dwelling is demolished, with the existing access retained and upgraded to provide a pedestrian and secondary access.

There are no other constraints to development at the site. If these comments and the potential opportunities associated with development had been taken into account the outcome of the assessment would have been different. The decision not to reassess the Green Belt around the Rural Centres means that housing and social related sustainability objectives would not be met.

Change To Plan:

Legally Compliant?: Not Specified

Full Reference: O - 65859 - 21155 - Annex 1. Site Assessment Proformas and Summary Results - Sites at Rural Centres (Part 2) - None

**65871 Object**

**Respondent:** Mr Roger Worboys [3125]

**Agent:** Carter Jonas LLP (Brian Flynn) [17331]

Summary: The assessment of land north of Elbourn Way, Bassingbourn concludes that development would have a significant negative impact on historic assets that are incapable of satisfactory mitigation. We disagree.

The impact on these assets could be addressed through careful design and layout of development with additional landscaping to minimise visual impacts.

If these comments and the potential opportunities associated with development had been taken into account the outcome of the assessment would have been different. The decision not to direct any significant development to Group Villages and proposed additional Minor Rural Centres means that housing and social related sustainability objectives would not be met.

Change To Plan:

Legally Compliant?: Not Specified

Full Reference: O - 65871 - 3125 - Annex 1. Site Assessment Proformas and Summary Results - Sites at Minor Rural Centres (Part 1) - None

**66084 Object**

**Respondent:** Hopkins Homes Limited (Robert Eburne) [25413]

**Agent:** N/A

Summary: Site SC255, Land East of Bush Close, Comberton

Disagree with negative findings of SAA - no robust evidence to support dismissal of the site.

Comberton is Minor Rural Centre whereby day to day services and facilities are close at hand. Development in tune with NPPF.

Biodiversity low - would add planting and native landscaping.

Negative impact on Green Belt purposes - enclosure by existing development & boundary planting neutralises impact. No encroachment towards city.

Distances to GP, City centre and employment misleading.

Schools - will help internalise trips within village.

Transport - no cycle lanes is common. Public transport to city / employment etc. Safe highway access & good access to strategic routes. Fronts byway 7.

Drainage & infrastructure - can be addressed.

Change To Plan: Amend modification

Legally Compliant?: Not Specified

Full Reference: O - 66084 - 25413 - Annex 1. Site Assessment Proformas and Summary Results - Sites at Minor Rural Centres (Part 1) - i, ii, iii, iv

66118 Object

Respondent: Ely Diocesan Board of Finance [3062]

Agent: Carter Jonas LLP (Brian Flynn) [17331]

Summary: We request that the following sites are released from the Green Belt and allocated for development or identified as safeguarded land to meet long term development needs.

Site SC037 - Land at Fulbourn Old Drift (south of Cambridge Road and north of Shelford Road), Fulbourn. Pages 1244-1251 of Annex 1 (Volume 4) of the Sustainability Appraisal (RD/MC/020 - Printed copy).

SC038 - Land north of Cambridge Road, Fulbourn Pages 1252-1259 of Annex 1 (Volume 4) of the Sustainability Appraisal (RD/MC/020 - Printed copy).

Relevant attachments:  
\*66118.pdf 40-41.  
\*66118 - Appendix

Change To Plan:

Legally Compliant?: Not Specified

Full Reference: O - 66118 - 3062 - Annex 1. Site Assessment Proformas and Summary Results - Sites at Minor Rural Centres (Part 1) - None

CHAPTER: Sustainability Appraisal                      Annex 1. Site Assessment Proformas and Summary Results - Sites at Minor Rural Centres  
Addendum Report                                      (Part 3)

66119 Object

Respondent: Ely Diocesan Board of Finance [3062]

Agent: Carter Jonas LLP (Brian Flynn) [17331]

Summary: Site SC327 - Land West of A10, Milton. Pages 1598-1604 of Annex 1 (Volume 4) of the Sustainability Appraisal (RD/MC/020 - Printed copy).

We request that the site is released from the Green Belt and allocated for development or identified as safeguarded land to meet long term development needs.

Relevant attachments:  
\*66119.pdf, paragraphs: 42.  
\*661199 - Appendix.pdf

Change To Plan:

Legally Compliant?: Not Specified

Full Reference: O - 66119 - 3062 - Annex 1. Site Assessment Proformas and Summary Results - Sites at Minor Rural Centres (Part 3) - None

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