

Appendix A: Draft Representations to South Cambridgeshire Local Plan – Issues and Options Report (July 2012)

1.0 Introduction

- 1.1 The City Council, South Cambridgeshire District Council and Cambridgeshire County Council have a long and effective history of joint working on planning matters, particularly on plan-making. The current development strategy for the Cambridge area set out in the Cambridgeshire and Peterborough Structure Plan 2003 was a result of effective joint working between the County Council and the districts in Cambridgeshire. This approach to joint working has led to appropriate arrangements being put in place to facilitate the duty to cooperate on strategic planning issues in the county through the establishment of the Joint Strategic Planning Unit for Cambridgeshire and Peterborough.
- 1.2 Under the duty to cooperate, the City Council and South Cambridgeshire District Council have agreed to work collaboratively and in parallel on new Local Plans and a transport strategy for the Cambridge area. This approach will ensure that cross-boundary issues and relevant wider matters are addressed in a consistent and joined-up manner.
- 1.3 Given the functional relationship between Cambridge City Council and South Cambridgeshire District Council, many of the evidence base studies have been carried out jointly and further work in relation to the spatial strategy for the Cambridge area (including housing and employment provision), including site options consultation, has been programmed to be undertaken on a joint basis as the preparation of both Local Plans continues.
- 1.4 In order to support these cooperative arrangements, a new Member Governance group has been set up and the Cambridge City, South Cambridgeshire and County Council Strategic Transport and Spatial Planning Group has already met on a number of occasions. This group is supported by officers from all three councils, who are working in collaboration on the production of the two new Local Plans and the transport strategy.

2.0 Draft representations to specific questions and parts of the Issues and Options Report

- 2.1 The draft representations detailed below are linked to specific questions or paragraphs within the Issues and Options report. Any representations of over 100 words will be summarised by officers as steered by Committee Members, with both the full submission and the summary text being provided to South Cambridgeshire District Council. The 100 word summary is a required element of submitting representations via South Cambridgeshire District Council's representation processing system.

Chapter 3 – Development Needs

Q3: How much new employment do you consider the Local Plan should provide for?

Nature of Representation: Support

Cambridge City Council supports the consideration of different levels of employment provision for South Cambridgeshire, but would take this opportunity to highlight the need to consider objectively assessed need for employment in the wider Cambridge area. In meeting the requirements of the NPPF, Cambridge City Council will continue to work collaboratively with South Cambridgeshire District Council to ensure that strategic priorities across local boundaries are properly coordinated and reflected in both Plans, particularly where development requirements cannot be wholly met within one authority's area.

Q4: How much new housing do you consider the Local Plan should provide for?

Nature of Representation: Support

Cambridge City Council supports the consideration of different levels of housing provision for South Cambridgeshire, but would take this opportunity to highlight the need to consider objectively assessed need for housing in the wider Cambridge area. In meeting the requirements of the NPPF, Cambridge City Council will continue to work collaboratively with South Cambridgeshire District Council to ensure that strategic priorities across local boundaries are properly coordinated and reflected in both Plans, particularly where development requirements cannot be wholly met within one authority's area.

Chapter 4 – Spatial Strategy

Q8: Do you think the Local Plan should include a specific policy focusing development on the re-use of previously developed land in sustainable locations, where the land is not of high environmental value?

Nature of Representation: Support

Cambridge City Council supports the delivery of development on previously developed land in sustainable locations, where the land is not of high environmental value. It should be noted, however, that despite the sustainable location of areas on the fringes of the city, many of these areas are of high environmental value. Additionally, the City Council is concerned that this issue does not provide sufficient coverage of the issue of sustainable development, which is a much broader concept, encompassing a range of environmental, social and economic aspects in order to achieve the greatest benefits for South Cambridgeshire.

Q13: Which, if any, of the following changes to the rural settlement hierarchy do you agree with?

Nature of Representation: Object

The retail hierarchy in Chapter 10 relates to the settlement categories in Chapter 4, with the town centre of Northstowe at the top of the hierarchy. However, it is surprising that Cambourne is not identified as having a town centre, given its range of shops and services and proposals for the further development of its High Street, and it is considered that this approach needs further consideration.

Chapter 5 – Development Options

Q16A: Which of the site options do you support or object to and why?

Nature of Representation: Support

The City Council is working in parallel with South Cambridgeshire District Council to prepare respective Local Plans. As part of this joint work, the Councils are undertaking work in relation to the spatial strategy for the Cambridge area, including housing and employment provision. The City Council supports the options being explored by South Cambridgeshire District Council at this stage, including Waterbeach, Bourn Airfield and an extension to Cambourne.

Chapter 6 – Climate Change

Q17: Have the right issues for addressing climate change mitigation and adaptation been identified?

Nature of Representation: Object

No reference has been made to the possibility of seeking consequential improvements to existing dwellings' energy efficiency in keeping with requirements of Part L of Building Regulations (currently applied to dwellings over 1,000m²). Consideration should be given to developing policy to be applied to planning applications for extensions/loft conversions, requiring the implementation of cost-effective measures to improve the entire property's energy efficiency. Uttlesford District Council operates a similar approach, applied to 1,400 planning applications between 2006 and 2009, with significant expected carbon savings. We have included an option (Option 50) on this issue in our Issues and Options report.

Q21: What sustainable building standards should be required in new developments?

iii) The zero carbon standard (Code for Sustainable Homes Level 5) would be required in larger scale developments?

Nature of Representation: Object

Cambridge City Council would support in principle a policy approach where opportunities to seek higher levels of the Code for Sustainable Homes and BREEAM are sought for those developments whose scale and mix would create opportunities not offered by smaller scale development. For example, if the scale of development and mix of uses made the use of Combined Heat and Power and district heating viable, this would make the achievement of Level 5 of the Code for Sustainable Homes possible. It is considered that this approach should be developed as part of a policy within the Local Plan to ensure that such opportunities are not missed. This particularly important on the larger sites on the city's fringes and for new settlements such as Bourn Airfield and Waterbeach, but it can be achieved on smaller sites, e.g. the 40 unit scheme at Richard Newcombe Court in Cambridge where both biomass and photovoltaic technology have been used to deliver a Code for Sustainable Homes Level 5 development. Given the nature of the district, South Cambridgeshire also has significant scope for the use of a wide range of renewable energy technologies. There may be potential for this to be developed as part of site-specific policies, dependent on the development strategy taken forward.

Q24: What approach should the Local Plan take on water efficiency in new housing development?

iii) Seek grey water or rainwater recycling (to achieve equivalent of code 5 or 6 of Code for Sustainable Homes), subject to financial viability.

Nature of Representation: Support

Cambridge City Council supports the achievement of Code for Sustainable Homes Level 5 or 6 of the on water efficiency measures for new residential development.

Chapter 7 – Delivering High Quality Places

Q28A. Have the right design principles been identified to achieve high quality design in all new developments?

Nature of Representation: Object

While we support the content of Chapter 7 in principle as it does capture the essence of both national and local policy, it is very brief in terms of what is currently, or should be, specific to South Cambridgeshire. We would expect to see strong, locally-specific design policies in place, given the level of growth which could come forward during the life of the plan, e.g. Waterbeach and Bourn Airfield. The section speaks of the need for new development to fit

in with its surroundings, but is relatively silent on what these surroundings are e.g. a mixture of rural villages, city-edge sites and larger settlements, and past development and any lessons learned. Whilst some of this information may be picked up as a part of site-specific policies, this should not prevent the production of strong design policies.

Q28B.Should the Local Plan provide guidance on design of streets to improve the public realm, including minimum street widths and street trees?

Nature of Representation: Object

It would be helpful if guidance could describe in more detail both rural and urban characteristics which exist within the District (building form, prevailing typologies of buildings, streets and open spaces) and describe some good (and perhaps poor) examples of how new development has responded to this context. Without this, this chapter does not strengthen existing policy and guidance and does not contribute strongly to improving development. Such an approach would help tease out some further facts, key objectives, issues and questions in developing the plan. For example, South Cambridgeshire villages do have a distinct character (via vernacular architecture, local materials, settlement patterns, and landscape) and these attributes demand a certain response in respect of infill or edge of settlement development. The design principles could then include options as to how to respond to these area-specific traits.

This approach would also help in ensuring any future settlements on the edge of Cambridge are equally context-appropriate. A description of emerging and existing edge of city development is equally relevant in order to enable the development of edge of city place-making to be of a high quality, and crucially for future policy in the plan to be appropriate to the edge of the city.

Q28C.Do you think the Council should retain and update the District Design Guide?

Nature of Representation: Support

A future chapter on high quality places should consider bringing in relevant details and develop strong policy, at least covering those key areas of guidance now found in the District Design Guide. More weight would be provided on those key areas of guidance if they were found in a design-specific policy or policies rather than in a Supplementary Planning Document. The Council should retain the Design Guide and update it from time to time as lessons are learned from its application. Public art should be integrated as a part of good design and should remain required for new development.

Chapter 8 – Protecting and Enhancing the Natural and Historic Environment

Q33A. Should the Local Plan include a policy requiring development to provide or contribute towards new or enhanced Green Infrastructure?

Nature of Representation: Support

Cambridge City Council supports the provision or enhancement of green infrastructure through new development. The Council is pleased to see references made to a number of projects within the Cambridgeshire Green Infrastructure Strategy 2011, which includes new provision of green infrastructure in the urban extensions and new settlements and better linkages between existing areas of green infrastructure.

Q33B. Are there other new Green Infrastructure projects that should be added?

Nature of Representation: Object

Whilst we support the provision of green infrastructure projects in principle, it would be helpful to make reference to the opportunities for green infrastructure provision and enhancement in North West Cambridge at NIAB2 and the University site.

Q34: Should the Local Plan include policies to ensure that development in and adjoining the Green Belt does not have an unacceptable impact on its rural character and openness?

Nature of Representation: Object

Whilst Cambridge City Council supports the inclusion of policies to ensure that development in and adjoining the Green Belt does not impact unacceptably on the rural character and openness, it is considered that explicit reference should be made to the purposes of the Cambridge Green Belt, including the need to maintain and enhance the quality of the setting of Cambridge and the prevention of communities in the environs of Cambridge from merging into one another and with the city. In addition to our concerns about the purposes of the Cambridge Green Belt and the setting of Cambridge, we consider that insufficient account has been given to the interface between urban and rural and the setting of Cambridge and the South Cambridgeshire villages within this document. In addition to policy covering important village frontages, it is considered important to conserve and enhance the landscape setting of the urban fringes, including sites which may lie within South Cambridgeshire.

Q38: Should the Local Plan identify any open spaces as Local Green Space and if so, what areas should be identified, including areas that may already be identified as Protected Village Amenity Areas?

Nature of Representation: Support

Given the recent introduction of the Local Green Space designation to identify and protect green areas of particular importance, the City Council considers that it is important for the authorities to work together at an early stage to establish similar approaches to cross-boundary green spaces.

Q41: Should a policy be developed for the consideration of development proposals affecting waterways that seeks to maintain their crucial importance for drainage, whilst supporting their use as a recreation and biodiversity resource?

Nature of Representation: Support

We strongly support the inclusion of a policy pertaining to the waterways of South Cambridgeshire, but consider that the importance of the River Cam needs greater acknowledgement within the document. Cambridge City Council has produced Option 23 – *Comprehensive policy for the River Cam* in the Cambridge Local Plan Towards 2031 – Issues and Options report and has also made reference to the possibility of undertaking a waterspace study for the River Cam. We wish to work together with South Cambridgeshire District Council in considering the development of both policies and any accompanying studies.

Chapter 9 – Delivering High Quality Homes

Q45: Housing Density – Which options do you agree with?

Nature of Representation: Object

Given the realistic densities that are now emerging on Cambridge's fringe sites, where approximately 45 dwellings per hectare (dph) are being delivered on some parcels, it is key that the authorities work together to consider suitable densities and associated design quality within planning policies. The City Council would like to understand South Cambridgeshire District Council's approach to the densities (40dph for fringe sites and new settlements) outlined in the document and would like to work with South Cambridgeshire District Council in progressing policies on density.

Q47: What approach do you think the new Local Plan should take to securing houses adapted to meet the needs of people with reduced mobility?

Nature of Representation: Object

Whilst the City Council is happy to see all affordable housing being built to Lifetime Homes standard, we would like to understand how South Cambridgeshire District Council have reached the figure of 5% market housing to be delivered to Lifetime Homes Standard. This is of particular

interest, given the increasing percentage of South Cambridgeshire's residents of 65 and over, and their changing needs.

Q48: What target should the Local Plan include to address the need for affordable housing?

Nature of Representation: Object

Given the needs of the area, the City Council would support an approach, which delivers significant levels of affordable housing provision, subject to viability. We would wish to see opportunities for delivering affordable housing provision maximised on strategic sites.

Q50: Do you think that new homes are often too small? How do think we should deal with the size of new homes?

Nature of Representation: Support

The City Council believes that South Cambridgeshire District Council should include policy on residential space standards, which covers both market and affordable housing to ensure sufficient room and dwelling sizes, internal and external storage. Given the financial implications for developers, particularly on the larger development sites, it is key to include such a policy in the Local Plan as the National Planning Policy Framework requires local plans to set out clear policies on what will and will not be permitted (paragraph 154) and supplementary planning documents should not be used to add unnecessarily to financial burdens on development (paragraph 153).

Q57: What approach should the Local Plan take to the accommodation needs of Gypsies, Travellers and Travelling Showpeople? Do you agree with any or all of the following approaches?

- i. **Set a target to provide 85 pitches for Gypsy and Traveller occupation over the period to 2031, which means we would need to provide an additional 50 permanent pitches by 2031.**

Nature of Representation: Support

The City Council would like to understand the target of providing 85 pitches in South Cambridgeshire over the period to 2031 and the implications of this approach. The information provided in Appendix 4: Analysis of Issues and Options does not appear to explain how South Cambridgeshire District Council has reached the reduced figure of 85 pitches.

- iii. **Explore with adjoining local planning authorities the extent to which local needs can be met in adjoining districts.**

Nature of Representation: Support

The City Council would welcome the opportunity to continue working with South Cambridgeshire District Council on this issue. However, in addition to the provision of permanent pitches in South Cambridgeshire, reference needs to be made to the need for transit pitches and emergency stopping places. The City Council would like to work with South Cambridgeshire District Council to achieve transit pitches and emergency stopping places in suitable locations, as necessary.

- iv. The Local Plan require that site provision be made for Gypsy and Traveller occupation in all new settlements, and other allocated and windfall developments of at least 500 new homes.**

Nature of Representation: Support

In terms of delivering site provision for Gypsy and Travellers in new settlements and within housing allocations and windfall sites of at least 500 homes, Cambridge City Council supports the delivery of pitches in these locations subject to impacts on the surrounding area and the proposed locations for pitches being of appropriate size and design with suitable supporting infrastructure and access.

Chapter 10 – Building a Strong and Competitive Economy

Q59: The Local Plan needs to aim to meet in full the forecast employment growth in South Cambridgeshire depending on the option selected (at Question 3), by providing a supply and range of employment sites over the Plan period. Should employment provision be planned for:

- i. Cambridge Northern Fringe East, and densification on the Cambridge Science Park:**

Nature of Representation: Support

The Council supports the exploration of further employment opportunities at Cambridge Northern Fringe East and Cambridge Science Park, following the publication of the Cambridge Cluster at 50 study. The success of these locations as employment sites could also depend on the provision of new shared social spaces as discussed in Issue 64 of the Issues and Options report. The exploration of further employment opportunities in these locations accords with evidence from the draft Employment Land Review update, which found a need for further office development in the city centre and the northern fringe. The City Council will explore options for delivering new office development in the city centre. Employment opportunities in the city's northern fringe will be crucial to meeting identified need. The City Council will continue to work with South Cambridgeshire when planning for the Cambridge Northern Fringe East area and in developing policies for this area.

- ii. **On new allocations on the edge of Cambridge which have previously been designated Green Belt:**

Nature of Representation: Support

The City Council will continue to work with South Cambridgeshire District Council in assessing the broad locations in the Green Belt on the edge of Cambridge.

Q60A: Should the existing employment allocations where development is partially complete be carried forward into the Local Plan?

Nature of Representation: Support

Cambridge City Council supports the proposal to carry forward existing employment allocations where development is partially complete. The draft update to the Employment Land Review states that there is a need to focus on ensuring that existing commitments are brought forward for development, and that existing vacant stock is improved to encourage re-use. Existing employment allocations should continue to be brought forward for employment use, as they will make a valuable contribution to meeting the need identified in the draft Employment Land Review update.

Q60B: Should the existing employment allocation North of Hattons Road, Longstanton be carried forward into the Local Plan?

Nature of Representation: Support

Cambridge City Council supports the proposal to carry forward existing employment allocations where development has not commenced. The draft update to the Employment Land Review states that there is a need to focus on ensuring that existing commitments are brought forward for development, and that existing vacant stock is improved to encourage re-use. Existing employment allocations should continue to be brought forward for employment use, as they will make a valuable contribution to meeting the need identified in the draft Employment Land Review update.

Q61A: Should the Council consider issuing Local Development Orders to help speed up employment development?

Nature of Representation: Object

Cambridge City Council would be concerned about the introduction of Local Development Orders (LDOs) for sites on the edge of the city, due to the potential negative impacts on the setting of the city. Ensuring high quality employment development is a key factor. There is also the risk that increased flexibility allowing changes of use could harm the ability of the local authorities to plan for the mix of uses identified in the Employment Land Review update, thereby impacting on the ability to plan for objectively assessed need.

Q62: What approach do you think the Local Plan should take to the Limitations on the Occupation of New Premises policy?

Nature of Representation: Support

The City Council will continue to work with South Cambridgeshire District Council in reviewing the policy approach to selective management of the economy.

Paragraph 10.24 (Tourist Accommodation):

Nature of Representation: Object

South Cambridgeshire District Council has granted permission for some major hotel schemes in the past five years adding significantly to the edge of city stock, including the Premier Inn (154 rooms) and Travelodge (138 rooms) budget hotels at Orchard Park, and the Radisson Blu at Cambridge Science Park (296 rooms). This is very much part of the Cambridge market area; the Science Park in particular generates a lot of business for the city's hotels.

No evidence base has been produced to identify the scale of future hotel need in South Cambridgeshire. The City Council's evidence base study only covers a small part of South Cambridgeshire. In many cases, needs assessments have not been submitted as part of the planning applications. Cambridge City Council has been a consultee on these applications, but there does not appear to be a joined-up approach taken to considering schemes in the light of the scale and location of hotel development needed in and around the city. In order to inform any such joined-up approach, South Cambridgeshire District Council should undertake an appropriate needs assessment.

There is also a need for future planning policy for hotel development in Cambridge to give greater clarity on how a joint policy approach to hotel development for Cambridge and its outskirts could be explored in both plans. The City Council would welcome the opportunity to work with South Cambridgeshire to progress planning policy on hotel development.

Q75: Where should new retail and service provision occur?

Nature of Representation: Object

The retail hierarchy in Chapter 10 relates to the settlement categories in Chapter 4, with the town centre of Northstowe at the top of the hierarchy. However, it is surprising that Cambourne is not identified as having a town centre, given its range of shops and services and the proposals for the further development of its High Street, and it is considered that this approach needs further consideration.

The City Council agrees that new retail provision should be of an appropriate nature and scale in line with the position of the centre in the retail hierarchy. The proposed development options in Chapter 5, set out potentially quite sizeable extensions to Cambourne and Northstowe and at the edge of Cambridge and potential new settlements at Waterbeach and Bourn Airfield. It will be important to ensure that if any of these developments are taken forward that they have adequate shops and facilities to serve the day to day needs of the new population and to ensure that people do not have to travel elsewhere, leading to unsustainable travel patterns. If any of these developments are taken forward, the position of their centre in the retail hierarchy will need to be identified in the new Local Plan.

Q76: What should be the floorspace threshold above which retail impact assessment are required?

Nature of Representation: Support

It is sensible that the floorspace threshold above which retail impact assessments would be required is lower than the NPPF level of 2,500 square metres given the rural nature of the District. The decision on whether to choose a threshold of 500 square metres or 250 square metres will depend upon the level of control the Council wishes to have versus the additional requirement put upon developers. Alternatively, a different threshold could be used for the different type of settlement. For example, in the Rural Centres the threshold could be 500 square metres and in all of the other villages the threshold could be 250 square metres to reflect the difference between these centres and whether a proposal would have an impact or not.

Depending upon which of the development options is taken forward, a different threshold may also be needed for the larger developments at Waterbeach, Bourn Airfield and extensions to Cambourne, Northstowe and at the edge of Cambridge.

Paragraph 10.28 (Meeting Retail Needs):

Nature of Representation: Object

In relation to 'retail need', the Issues and Options Report refers to the Cambridge Sub-Region Retail Study 2008. Although this provides a good evidence base for the need for further comparison and convenience goods, it only covers the period to 2021, whereas the new Local Plan will cover the period to 2031. In addition, some of the assumptions made in this study may be out of date as it is now four years old. The new Local Plan will need to ensure that the day-to-day needs of people are adequately served. In particular, that Northstowe's retail provision is adequate to prevent unsustainable travel patterns to access shops and services elsewhere. There will also need to be consideration of the 'need' for new retail development where new development is being proposed, particularly the larger potential developments at Waterbeach, Bourn Airfield and extensions to Cambourne, Northstowe and at the edge of Cambridge.

Chapter 11 – Promoting Successful Communities

Q81A: Should the Local Plan seek to continue to protect where possible local services and facilities such as village shops, pubs, post offices, libraries, community meeting places, health centres or leisure facilities?

Nature of Representation: Support

Whilst it is recognised that South Cambridgeshire residents rely on Cambridge for access to higher order services and facilities, it is important that South Cambridgeshire's residents have access to a range of services and facilities within a sustainable distance of their dwellings to allow access by non-car modes of transport. As the city grows, the challenge will be for the historic and tightly constrained City Centre to cope with the increasing numbers of people, and to accommodate the range of services and businesses that want to locate here. Whilst it is recognised that this is an issue for Cambridge City Council, we will need to work together with South Cambridgeshire District Council as part of the wider joined-up approach.

Q84A: Is there a need for a community stadium?

Nature of Representation: Support

Both the City Council and South Cambridgeshire District Council are consulting on options relating to the provision of a community stadium. The results of both consultations will inform the preferred option for inclusion in the authorities' draft Local Plans. The City Council will continue to work with South Cambridgeshire District Council to develop appropriate policies to deal with this issue.

Q85A: Is there a need for an ice rink in or near to Cambridge?

Nature of Representation: Support

Both the City Council and South Cambridgeshire District Council are consulting on options relating to the provision for an ice rink. The results of both consultations will inform the preferred option for inclusion in the authorities' draft Local Plans. The City Council will continue to work with South Cambridgeshire District Council to develop appropriate policies to deal with this issue.

Q86A: Is there a need for a concert hall in or near to Cambridge?

Nature of Representation: Support

Both the City Council and South Cambridgeshire District Council are consulting on options relating to the provision for a concert hall. The results of both consultations will inform the preferred option for inclusion in the authorities' draft Local Plans. The City Council will continue to work with

South Cambridgeshire District Council to develop appropriate policies to deal with this issue.

Q88A: Should major new housing developments include provision of allotments?

Nature of Representation: Support

The City Council supports the principle of allotment provision for major new housing developments. The City Council and South Cambridgeshire District Council have successfully negotiated and approved a number of new allotment sites within the urban extensions.

B: Do you agree with the standard of provision proposed in Issue 88?

Nature of Representation: Support

Cambridge City Council supports the standard of 0.4 hectares per 1,000 people as this reflects the City's existing and proposed allotment standard. It is considered that the adoption of 0.4 hectares per 1,000 people as the South Cambridgeshire standard would be beneficial in the instance of cross-boundary and urban fringe development.

Q89A: Do you agree the thresholds for when on-site open space will be required in new developments?

Nature of Representation: Object

No

Q89B: If not, why not? What alternative policy or approach do you think should be included?

Nature of Representation: Object

On-site provision of open space should be the norm within new residential development. No justification has been provided for the figure of 200 dwellings as the trigger for delivery of open space on site in the case of provision of sports pitches and outdoor sport and allotments. The City Council is concerned that the figure is inappropriate as it is possible for a number of individual parcels of land to come forward in a fringe location or in one of the necklace of villages, where the provision of dwellings per site is under 200 units, but the cumulative impact on surrounding sports or allotment provision could be significant. Taking the village of Sawston as an example, there are seven sites in Chapter 5, which have dwelling capacity ranges of between 20 and 340 dwellings. If a number of these sites come forward for development, the impact on existing open spaces could be considerable, without the delivery of new green infrastructure to meet needs. We acknowledge the collection of S106 contributions towards off-site open space provision, but remain concerned that the figure of 200 units is too high.

Q91A: Should the Local Plan include a policy seeking to protect existing playing fields and recreation facilities?

Nature of Representation: Support

The City Council would support a policy seeking to protect existing playing fields and recreation facilities as this is in keeping with its long-established approach of protecting open space contained in the Cambridge Local Plan 2006 and the Open Space and Recreation Strategy 2011. Given the recent introduction of the Local Green Space designation to identify and protect green areas of particular importance, the Council considers that it is important for the authorities to work together to establish similar approaches to cross-boundary green spaces.

Chapter 12 – Promoting and Delivering Sustainable Transport and Infrastructure

Q97: Should the Local Plan include the principles regarding sustainable travel as outlined in Issue 97, and are there any additional issues that should be included?

Nature of Representation: Support

Cambridge City Council supports the inclusion of the principles of sustainable travel outlined in Issue 97, particularly greater connectivity of cycling and walking networks.

Q101: What approach should the Local Plan take to residential garages?

Nature of Representation: Support

The City Council supports the introduction of minimum size requirements for garages to accommodate, cars, cycle parking and other storage, but notes that consideration should also be given to minimum sizes for double garages. The information provided in Appendix 4 only relates to single garages. Lessons could also be learnt from the difficulties experienced in the provision of car parking, both on and off-street, in the urban extensions.

Q107A: Should the Local Plan include a policy to require development to provide appropriate infrastructure?

Nature of Representation: Support

The policy approach requiring development to provide appropriate infrastructure is supported. There is the need to assess the viability of the Local Plan in terms of considering the range of policy requirements and infrastructure plans that are likely to impact on the cost of development. Collaboration and consistency of approach with Cambridge City Council will

be important factors in establishing and updating the evidence base for both Local Plans, in terms of variables, viability testing and appreciation of impacts on cross-boundary infrastructure delivery.

Q106A: Should the Local Plan include a policy that would only permit aviation development at Cambridge Airport where it would not have a significant adverse effect on the environment and residential amenity?

Nature of Representation: Support

Both the City Council and South Cambridgeshire District Council are consulting on options relating to aviation development at Cambridge Airport in order to maintain environmental quality and residential amenity. The results of both consultations will inform the preferred option for inclusion in the authorities' draft Local Plans. The City Council will continue to work with South Cambridgeshire District Council to develop appropriate policies to deal with this issue.

Chapter 13 – Site Specific Issues

Q108: What approach should the Local Plan take to Cambridge Airport?

Nature of Representation: Support

Both the City Council and South Cambridgeshire District Council are consulting on options relating to the airport and Cambridge East. The results of both consultations will inform the preferred option for inclusion in the authorities' draft Local Plans. The City Council will continue to work with South Cambridgeshire District Council to develop appropriate policies to deal with this issue.

Q109: What approach should the Council take to the potential for housing development on land North of Newmarket Road at Cambridge East?

Nature of Representation: Support

Whilst the land lies within South Cambridgeshire, given the functional relationship with the city, the City Council wishes to work together with South Cambridgeshire District Council to consider the outcome of public consultation and the long-term future of this site.

Q110: What do you think are the key principles for the development of Cambridge Northern Fringe East?

Nature of Representation: Support

Cambridge Northern East is a key area for the City Council, County Council and South Cambridgeshire District Council and will be the focus of important joint working by the three councils over the coming months. It is disappointing to see from the representation submitted by South Cambridgeshire District Council to the City Council's Issues and Options Report that they have already taken a view on the sites that should be included within this area, prior to the close of the SCDC consultation period on this issue. A key recommendation from the joint (City & SCDC) update to the Employment Land Review is that the boundary of the area should be broader and include the Science Park.

As the joint work on the planning of Cambridge Northern East is taken forward, there will need to be wide ranging discussions and further consultation about the appropriate development strategy, including agreement as to the most appropriate boundary for the area. These discussions have not concluded and the City Council will continue to work with the County Council and South Cambridgeshire District Council to develop appropriate policies and co-ordination of development plans to deal with these issues.