

**ENVIRONMENT COMMITTEE**

(Special)

16 April 2002

10.00am – 12.50pm

**Present:** Councillors Bradnack, Dixon, Douglas, Durrant, Harrison, Howarth, Johnston, Slatter, Ward, White

**Also:** Cllr Blencowe during discussion on minutes 02/h/ and 02/h/

**FOR THE INFORMATION OF THE COUNCIL****02/h/43 APOLOGIES**

There were no apologies for absence.

**02/h/44 DECLARATIONS OF INTEREST**

There were no Declarations.

**02/h/45 PUBLIC QUESTION TIME**

There were no questions from members of the public.

**02/h/46 SOUTH AND EAST AREA TRANSPORT PLANS**

The report set out the updated draft Southern Corridor Area Transport Plan and Eastern Corridor Area Transport Plan, and sought approval to these documents being submitted to public consultation along with the draft Section 106 Planning Obligation Strategy approved at the last meeting. It was intended that the Area Transport Plans would form Supplementary Planning Guidance and be a material consideration in determining planning applications in the areas which they cover in the future.

The Southern Corridor Area Transport Plan (SCATP) in its original form had been adopted as Supplementary Planning Guidance to the Cambridge Local Plan on the 10 January 2000. Similarly, the Eastern Corridor Area Transport Plan (ECATP) had been adopted on the 6 November 2000. The plans had been accepted by developers and others, and used to generate resources to fund transport infrastructure schemes.

Revised versions of the two plans had been presented to the Cambridgeshire County Council/Cambridge City Council/South Cambridgeshire District Council Environment and Transport Joint Strategic Forum on the 23 January 2002. The Forum endorsed both plans for the purposes of consultation. The changes to the Plans from the original documents were set out in Appendices to the report.

The implementation process for each scheme would be clarified in the report before consultation.

**Resolved to:**

1. note and endorse the Southern and Eastern Corridor Area Transport Plans, subject to
  - a) additional information being set out in the appended schedules giving details of:
    - i. how the schemes addressed the needs of individual developments, and
    - ii. examples of trip rates likely to be generated by developments
  - b) the Chair and Spokesperson being consulted on the final schedules before beginning the consultation exercise.

for the purposes of consultation prior to considering their adoption as Supplementary Planning Guidance.

2. note and endorse the suggested priorities for schemes to be implemented within each of the plan areas.

#### 02/h/47      **STRUCTURE PLAN RESPONSE**

The report advised members of the contents of the Cambridgeshire and Peterborough Joint Structure Plan Review Deposit Draft March 2002 and sought agreement on a response on behalf of the City Council.

Structure Plans set out in broad terms the general policies and proposals that were of strategic importance for the development and use of the land in the area. Such plans should not contain detailed policies or site specific proposals to be used for development control (which are matters for Local Plans), but should concentrate on providing a strategic framework within which detailed policies can then be framed in Local Plans (Structure Plans – A Guide to Procedures, DETR, 2000).

Cambridgeshire County Council and Peterborough City Council were required to prepare and keep up to date a Structure Plan for the area and the current Structure Plan had been adopted by Cambridgeshire County Council in 1995. This was now due for replacement.

The Cambridgeshire and Peterborough Joint Structure Plan Review Deposit Draft, covering the period to 2016, had been published for consultation on 11 March. The consultation period would end on 22 April 2002. The preparation of the Structure Plan should be viewed in the context of national and regional planning guidance and be in accordance with national planning policy set out in Planning Policy Guidance Notes (PPGs), Circulars and other policy statements such as ministerial statements or White Papers (unless there was adequate justification for departure). In addition, the Structure Plan was to be prepared in accordance with Regional Planning Guidance for East Anglia (RPG6) published in November 2000.

The Structure Plan had important implications for planning policy in the City of Cambridge. The Cambridge Local Plan, which was currently being reviewed, must

be 'in general conformity with the Structure Plan' (PPG12, paragraph 6.1). Therefore it was important to ensure that the City Council was satisfied with the Structure Plan as this would provide the basis upon which the Local Plan would be written.

As had been highlighted in the officers' report to Committee in January, the Government's Green Paper, 'Planning: Delivering a Fundamental Change' proposed the abolition of Structure Plans. However, the Green Paper made it clear that 'until the necessary legislation is introduced, counties should fulfil their statutory obligations and carry out reviews of structure plans on the issues that matter'.

The amendment set out below proposed by the Labour Group was considered:

- 1 'Page 32 - chapter 1, para 2  
Delete first sentence  
Amend 2<sup>nd</sup> sentence to start: 'The City Council recognises that the timescale for delivery ....'  
Amend 3<sup>rd</sup> sentence to start: 'The merits of Oakington ....'
- 2 Page 34 – chapter 2  
Add change to Policy P2/3 by amending the first bullet point to start: 'A new settlement at Longstanton would provide ...'
- 3 Page 44 – chapter 8  
Objection to Policy 8/10, line 5, amend 'then' to 'that'.  
Amend line 8 – 10 to: 'The City Council is yet to be convinced that the proposed guided bus system would be able to address the needs of the proposed new settlement as well as meeting its original intention of relieving congestion on the A14.'
- 4 Page 45 – chapter 9  
Do not support the City Council's version of Policy 9.9j
- 5 Page 47  
Do not support City Council's amendment to para 9.26
- 6 Page 47 Policy 9/4 objection  
First sentence of first para: amend 'A new settlement is to be developed to 'It is proposed to build a new settlement.'
- 7 Page 47 Policy P9/4  
Last sentence of first paragraph amend: 'proved' to 'was judged'
- 8 Page 47 policy P9/4 objection  
3<sup>rd</sup> paragraph: Delete first sentence  
Amend 2<sup>nd</sup> sentence to start: 'The City Council recognises that the timescale for delivery ...'  
Amend 3<sup>rd</sup> sentence to start 'The merits of Oakington ...'

A further amendment by Cllr Howarth 'that paragraphs 2, 3, 6 and 7 of the above amendment be agreed and that the sentence in the first paragraph of the objection to

Policy P8/10 beginning: 'Therefore, it may not be able to relieve congestion ... ' be deleted' was carried unopposed.

An amendment to Policy P5/4 – Meeting Locally Identified Housing Needs: Paragraph 5.17 – to changed it to read as set out below was lost by 7 votes to 3:

'5.17 Housing development may be expected to make a contribution to locally identified housing needs for affordable housing, and housing for specific groups including the elderly, key workers, students, the homeless, travellers and gypsies. The inclusive target for land to meet locally identified housing need will vary, although it is likely to be within an indicative range of 30-50% of each housing development site'. With sites released from the Green Belt, this proportion should be 50%.'

Following discussion, members amended the comments on the Structure Plan Response.

**Resolved** (by 6 votes to 4) to

1. approve the proposed comments on the Structure Plan set out in Appendix 1 of the report, as amended, of this report, a full copy of the final submission will be attached to the bound copy of these minutes as Appendix 1.
2. instruct the Director of Environment and Planning to present these comments to the County Council for consideration and to advocate them at the Structure Plan Examination in Public later this year together with any additional statements and evidence that may be required.

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**APPENDIX 1****COMMENTS ON DEPOSIT DRAFT STRUCTURE PLAN**

As a general statement, the support of the City Council for policies and paragraphs that are not identified below can be assumed. Comments are therefore limited to those where the City Council has concerns, with exceptions where the City Council is strongly in support of the policy approach set out in the Structure Plan.

The term OBJECT should not be interpreted to mean opposition to a policy or paragraph in its entirety; rather to the specific points made in the comment.

Only certain topics will be selected for discussion at the EiP. The City Council may wish to present further evidence on these matters to the EiP. However, for the remaining topics, these representations will be the last formal opportunity for the City Council to comment on the Structure Plan.

**CHAPTER 1 – PROVIDING FOR TODAY AND FOR THE FUTURE****Policy 1/1 - Approach to Development****OBJECT**

This policy is consistent with the City Council approach to the location of future development which has been developing since 1998 with the exception of its support for a new settlement at Longstanton/Oakington. The City Council have not accepted the principle of a detached new settlement as a preferred means of accommodating growth in the Cambridge sub-region. The flexibility proposed for small-scale development in rural areas given by the last sentence seems sensible and is reinforced by paragraph 1.18.

The eastern expansion of Cambridge remains the preferred option for the City Council to accommodate the new settlement growth target identified in the Structure Plan. It recognises however that the timescale for delivery of large-scale development on the airport site is uncertain at present because of the need to relocate the airport business, and it therefore accepts that a new settlement may be necessary within the Plan period. However, the merits of Oakington/Longstanton in comparison with the other potential sites, especially as regards transport, have not yet been satisfactorily established and the City Council is therefore unable to endorse this or any other specific location for the new settlement at this stage. For these reasons it may support a new settlement in the Cambridge Sub-Region but not yet at any specific location. It will be concerned to test the advantages and disadvantages of alternative locations in respect of their relationship with Cambridge through the Structure Plan EiP (also see our comment on policy P9/4).

**Paragraph 1.23****OBJECT**

The phrase 'development in the countryside' needs some qualification to ensure that an extreme case cannot be made against all development. Development on the southern parts of Clay Farm might be said to be in the countryside; building around Teversham and Fulbourn almost certainly is, although the second sentence may provide a get out. Replace first sentence with: 'Significant freestanding development in open countryside is not normally sustainable'.

**Policy P1/2 - Environmental Restrictions on Development****OBJECT**

The section of this policy dealing with the protection of areas of biodiversity, or areas of historic or architectural or other interest is of importance and if adopted the policy will be relied upon in planning appeals against refusals of planning permission. In this regard it is not acceptable for the final bullet point dealing with these matters to be without a supporting paragraph. Furthermore the policy fails to recognise the importance of nationally listed parklands and gardens and reference to them ought to be included in the policy text (see also our comment on Policy P7/1).

In many respects, however, this policy is inadequate. Cambridge is an internationally famous historic city and Peterborough and Ely are important cathedral cities. It is the quality of the built environment throughout the County that underpins its attractiveness for development and harm to that built environment could jeopardise its future growth and prosperity. An additional policy is needed as follows which should be inserted on page 61 alongside paragraph 7.16. 'Local Planning Authorities will ensure that the quality of the historic built environment is protected and improved by preserving buildings and their settings and supporting their appropriate re-use, by retaining important buildings and features in historic areas, by ensuring that new development adds to the quality of the built environment and respects local character and by promoting management policies and enhancement schemes for specific areas and groups of buildings'.

**Policy P1/3 - Sustainable Design in Built Environment****OBJECT**

It is helpful to have key principles established at a strategic level to support more detailed Local Plan policies and guidance but we would like more recognition given to the importance of allotments and community facilities. Amend the wording of the 13<sup>th</sup> bullet point to read 'includes attractive green spaces and corridors for recreation and biodiversity including allotment sites'. Amend the wording of the last heading, currently reading 'Takes account of community requirements by' to read 'Provides adequate community facilities by'.

**Policy P1/4 - Plan, Monitor and Manage****OBJECT**

What is the meaning of the word 'timely' in the first bullet point? Does it mean in advance, just in time, at a convenient time, when funding becomes available? Object on grounds of a lack of clarity. Replace with 'action to ensure that infrastructure is provided to meet the demands generated by development as they arise'. Also need to include a cross-reference to Chapter 6 and policies P6/1, P9/9 and P10/7 for greater clarity on the types of infrastructure that will be sought.

**CHAPTER 2 – PLACES FOR WORK****General****COMMENT**

It is important to ensure that this chapter of the Structure Plan is consistent with the Regional Economic Strategy, 'Prosperity and Opportunity for All – East of England 2010' prepared by the East of England Development Agency (EEDA).

### **Policy P2/1 - Employment Strategy**

#### **OBJECT**

The employment strategy continues the idea of the selective management of the Cambridge economy, the need for infrastructure investment and support of the high-tech and knowledge based industries. We generally support this policy on the basis that this is essential if a better balance between jobs and homes is to be found whilst still permitting economic growth. However, we object to the precise wording of the first bullet point and suggest the deletion of the words, 'and knowledge-based industry' and replacement with, 'knowledge-based industry and higher education sector.', given the importance of higher education in Cambridge and as a foundation to the growth of the City.

### **Policy P2/2 - General Location of Employment**

#### **OBJECT**

Whilst we would support the general thrust of the policy, it is not clear how much employment land is needed during the Structure Plan period. The accompanying text is ambiguous (see objection to paragraphs 2.19 and 2.21). This needs to be clarified. We object on the grounds of lack of clarity. The Structure Plan should state how much, if any, additional employment land is needed.

### **Paragraphs 2.19 and 2.21**

#### **OBJECT**

There would appear to be inconsistencies between paragraphs 2.19 and 2.21 concerning employment land. This needs to be clarified. Is there, or is there not enough employment land to cater for projected growth? We object on the grounds of lack of clarity. The Structure Plan should state how much, if any, additional employment land is needed.

### **Policy P2/3 - Strategic Employment Locations**

#### **OBJECT**

The second bullet point currently reads 'the new settlement at Longstanton/Oakington will provide...'. Until such time as the location of the new settlement is confirmed, we would prefer the wording to read, 'a new settlement at Longstanton/Oakington would provide...'

The last bullet point states that locations on the edge of Cambridge will be identified for mixed-use developments including the expansion of education and research facilities. This is then cross-referenced to areas identified in policy 9/3c. This is inconsistent with paragraph 2.27 which states where these strategic employment sites are to be located. For the sake of clarity, it would be helpful to state these strategic employment sites within the last bullet point of the policy itself, and not refer to all of the sites to be released from the Green Belt as not all of them are suitable for employment development.

In addition, we consider that it would also be appropriate to identify the Cambridge Northern Fringe East as a strategic employment site (although clearly this area is not currently within the Green Belt).

Finally we note that the Key Diagram Cambridge inset does not show the strategic employment location at the airport. This should be amended to ensure consistency with text in paragraph 2.27. By the same token, if our comment concerning Cambridge Northern Fringe East above is accepted, this site should also be shown on the Key Diagram Cambridge inset.

Replace last bullet point of policy with 'locations on the edge of Cambridge to the south and west of Addenbrooke's, between Madingley Road and Huntingdon Road, at Cambridge airport and on the Cambridge Northern Fringe East will be identified for mixed use developments including the expansion of education and research facilities'. Amend key inset map and paragraph 2.27 accordingly. (Delete references to P9/3c).

### **Paragraph 2.23**

#### **OBJECT**

This paragraph refers to Alconbury Airfield. Mention should be made of the fact that it may be a suitable site for the relocation of Cambridge Airport. We object to this omission. We suggest that a sentence is added at the end of the paragraph stating, 'Alconbury Airfield may be a suitable site for the relocation of Cambridge Airport'.

### **Policy P2/4 - Development and Expansion of Clusters**

#### **OBJECT**

This paragraph requires the allocation of sites for clusters. Paragraph 2.33 implies that local planning authorities will need to develop policies to cater for different types of cluster. (We note that this issue is developed further in policy P9/7, this objection therefore also relates to policy P9/7). We have concerns about the use of the term clusters, which sounds rather open ended. Particularly in the Cambridge context, it is imperative that such a policy does not provide carte blanche to any type of development that could claim some tenuous 'cluster'. We would emphasise the selective management of the economy and the requirement to demonstrate the need for a Cambridge location. We continue to be concerned about cluster development in unsustainable locations and therefore we welcome the second bullet point of the policy and also the reference to 'of an appropriate scale in rural areas' in the fourth bullet point. It is important to emphasise that cluster development does not necessarily rely upon the adjacency of related activities. Proximity within the sub region will usually be sufficient. Therefore it is important to seek to locate any new cluster development in sustainable locations where they can be readily served by public transport. We object due to the need to ensure that the development of clusters is appropriately managed and will not lead to uncontrolled growth of clusters, particularly in unsustainable locations.

### **Figure 2.1 - Employment Clusters**

#### **OBJECT**

This figure is of poor quality and does not accurately reflect the pattern of cluster development. For example, the figure does not reflect the scale of development at the Cambridge Science Park. We object on the basis of lack of clarity.

**Paragraph 2.30****OBJECT**

As the second bullet point of this paragraph is currently written, it implies a cluster of any services whereas it would be more accurate if it referred specifically to computer software and related services. We object on the basis of lack of clarity. Suggest that the word 'related' is inserted before services.

**Paragraph 2.32****OBJECT**

Whilst speculative development may be acceptable in the Cambridge context, it should be made clear that the principles of selective management still apply. Therefore, occupiers would be subject to the same tests as set out in policy P9/8. We object due to lack of clarity. We suggest that a cross reference should be made to policy P9/8 using the suggested wording, 'Occupiers of speculative development in the Cambridge context will be subject to the criteria set out in policy P9/8'.

**Policy P2/5 - Distribution, Warehousing and Manufacturing****OBJECT**

The policy states that no distribution or warehousing will be permitted within or close to Cambridge. We are concerned that this is un-duly restrictive and does not allow for small-scale storage facilities. Whilst we acknowledge that housing and employment with a need to be close to the City have priority on land and agree that large-scale regional warehousing and distribution depots should be discouraged, some limited B8 uses would help to diversify the economy and provide more opportunities for low skilled workers. Whilst paragraph 2.35 refers to large-scale distribution and warehousing, this is not reflected in the policy itself which provides a blanket restriction, regardless of size. We object on the basis on lack of clarity and inconsistency between policy P2/5 and paragraph 2.35. The policy should be amended to allow for some small scale B8 uses. It may be appropriate to suggest a guideline for the definition of small scale in paragraph 2.35, up to 1850 sq m (as used in the previous Structure Plan). The policy should also protect against the loss of existing quality sites for manufacturing, distribution and warehousing where these are located in sustainable locations in order to assist in maintaining a balance of employment opportunities. The policy should be amended to make reference to the need for the selective protection against the loss of such sites.

**Other Issues****OBJECT - ICT**

The impact of ICT should be mentioned elsewhere in chapter, not just in relation to rural economy (paragraph 2.38). We object on the basis that ICT should be acknowledged as having a major impact in both urban and rural areas.

**OBJECT – Cambridge University and Anglia Polytechnic University**

We object to the fact that there is very little mention of Cambridge University or Anglia Polytechnic University in the Structure Plan (other than obliquely in policy

P2/3 and North West Cambridge in P9/3a). In view of the strategic importance of education to Cambridge and the surrounding area, we suggest that the Structure Plan should include a policy and paragraphs covering their development. This should be included either in Chapter 2 or Chapter 9.

#### OBJECT – Research Establishments

We object to the fact that there is no reference made to Research Establishments. It is recognised that these often fall outside of the usual B or D1 uses. Therefore, we recommend that provision is made for the controlling the development of such uses in the Structure Plan.

### CHAPTER 3 - CITY, TOWN AND RURAL CENTRES

#### Policy P3/1 - Vitality and Attractiveness of Centres

##### Paragraph 3.10

#### OBJECT

We support the general thrust of this policy as it seeks to support existing centres and restrict out of centre developments. However, it is not clear precisely what is meant by a City and Town Centre Strategy. Whilst it is a laudable aim to have a strategy for the City Centre and indeed, we would probably prepare some form of Strategy for the City, we do not consider that this is a land use planning issue, nor do we consider that the County Council have the authority to demand the preparation of such a Strategy. We need to know what checks and indicators need to be put in place. This needs to be related to the Local Plan. We also consider that there should be a reference to the creation of a sense of place in City and Town Centre developments. We object on the basis of lack of clarity and question whether this is really a land use planning issue or within the powers of the County Council. Suggest that the Local Plan is the appropriate forum to address these issues. Therefore, the first sentence of this policy should be re-worded to state, 'The vitality and attractiveness of city and town centres will be promoted and enhanced through the development of appropriate policies in the Local Plan.' Reference should be removed to a separate City and Town Centre Strategy in paragraphs 3.10 to 3.15 since this is not a land use planning issue and it is up to each individual local planning authority to decide what other strategies they may wish to develop. We also suggest that bullet point 7 is expanded to include the wording, 'and the creation of a sense of place'.

#### Policy P3/2 - Locating uses which attract large numbers of people

#### OBJECT

We generally support this policy in that it seeks to support existing centres and restrict out-of-centre developments. However, mention should also be made of district and local centres in the sequential approach to development outlined in the second and third sentences of this policy. We therefore object and suggest an amendment to the third sentence of policy, adding the words 'district or local centre' after 'edge-of-centre'. This will ensure consistency with paragraph 3.18 and PPG6.

#### Policy P3/3 - Local Facilities and Services in Urban Areas

#### OBJECT

Whilst we support the general thrust of this policy to encourage the retention of local facilities and services in urban areas, we object to the policy on the basis that it should also require the provision of new local facilities and services in new developments in line with the location and scale of the developments. Therefore an additional sentence should be added to policy P3/3 as follows, 'New local facilities and services should be required in new developments in proportion to their location and scale.' This needs to be cross-referenced to policy P6/1.

#### **Policy P3/4 - Rural Services and Facilities**

##### **OBJECT**

Whilst we support the retention and expansion of village shopping facilities, it is clearly important to avoid overprovision of retail in small villages. Retail should be in sustainable locations. We object on the basis that such retail facilities should be of a scale appropriate to their location and serving a local function. Therefore amend the policy, inserting the words 'of a scale appropriate to their location and serving a local function' after the word 'facilities'.

#### **Other Issues**

**OBJECT** - Level of shopping provision in the eastern expansion

The Plan as it stands is not positive enough about the desirability of ensuring a good level of shopping provision in the eastern expansion, especially in its maximum form where the creation of some kind of 'civic' core will be an essential part of its character.

**OBJECT** – shopping in the new settlement

Similarly, the Plan should be clearer about its expectation for shopping in the new settlement. This is not likely to be self-contained in retail terms, but an aspiration must be to reduce the need to travel into Cambridge.

### **CHAPTER 4 - TOURISM, RECREATION AND LEISURE**

#### **Policy P4/1 - Tourism, Recreation and Leisure Strategy**

##### **OBJECT**

We agree with the wording in paragraph 4.7 regarding positive management and selective development. However, we disagree with the wording in the last sentence of Policy P4/1. The policy is inconsistent with paragraph 4.7. In any event, this is not a Structure Plan issue. We object due to inconsistency, precise wording and the fact that this is not a land use planning matter. Therefore, we suggest that the last sentence of the policy is deleted.

#### **Policy P4/2 - Informal Recreation in the Countryside**

##### **OBJECT**

This policy should not be limited to 'the countryside'. We therefore object. Delete references to 'the countryside' in policy title, first and third sentences of the policy, and in the supporting text.

The wording of the first sentence is unclear. We object due to lack of clarity. We suggest that the first sentence is re-worded to read, 'Local Plans and plans for major new developments will include provision for informal recreation...'.

More generally this policy should be more positive. We are seeking an embodiment of the principle of greater provision and use of open space, especially land within the Green Belt. This should be managed to improve accessibility and recreational potential. In relation to urban extensions we will be seeking substantial quality areas of open space and water based recreation, to maintain the green character of Cambridge. New development will be expected to incorporate open space and water based recreation in proportion to its location and scale.

### **Policy P4/3 - Protection of Open Space and Recreation Facilities**

#### **OBJECT**

There is currently no reference to the protection of open spaces for environmental reasons in the Structure Plan. We object due to the need to protect some open spaces for environmental as well as recreational reasons. Therefore we suggest that open spaces should be protected for environmental reasons under policy P7/1 (see detailed representation on policy P7/1) and that a sentence is added at the end of paragraph 4.14 cross referencing this fact. Our suggested wording for this additional sentence at paragraph 4.14 is, 'Most open spaces also contribute to the environmental quality of the area, and are protected for this reason under policy P7/1.'

Alternatively, this issue could be addressed by adding the following wording to the end of policy P4/3, 'and the open space does not contribute to the environmental quality of the area.' and by referring to the environmental importance of open spaces in paragraph 4.15.

Second, it is not clear whether or not this policy relates to indoor recreation and leisure facilities such as swimming pools, theatres, cinemas and galleries. We object due to lack of clarity. We suggest that a reference is added in text, and possibly also in policy 4.3 to make this clear. Alternatively it may be considered more appropriate for a policy for the protection of such indoor recreation facilities to be included in Chapter 3 or indeed not at all. Ultimately, the most important issue is to provide greater clarity to what recreation facilities policy P4/3 does and does not apply to.

## **CHAPTER 5 - WHERE WE LIVE**

### **Policy P5/1 – Housing Distribution**

#### **SUPPORT**

Provision is to be made for 12,500 homes in Cambridge between 1999 and 2016, 17.8% of the County total. The last Structure Plan target provision amounted to 6.2% of the County total. The principle being followed is to concentrate more growth in Cambridge on the grounds of sustainability and to conform with the policy of Regional Planning Guidance. It will also assist in addressing the local need for affordable housing and housing for other specific groups.

### **Policy P5/4 – Meeting Locally Identified Housing Needs**

#### **Paragraph 5.17**

#### **OBJECT**

As written the supporting text paragraph 5.17 implies that significantly more than 50% of a site could be developed for other than open market housing given that the

definition of affordable housing given in paragraph 5.18 and the definition for affordable housing in the glossary do not include key worker housing or provision for other specific groups. It is proposed that the supporting text be clarified by making it clear that provision should be made for the full range of locally identified housing needs within the area to be set aside for other than open market housing, not just for affordable housing.

The exception to this approach is in relation to housing suitable for those with mobility problems which, as appropriate should apply to all types of housing provision. We therefore suggest that the last 5 words of bullet point three are deleted.

Paragraph 5.17 should be replaced with the following:

'5.17 Housing development may be expected to make a contribution to locally identified housing needs for affordable housing, and housing for specific groups including the elderly, key workers, students, the homeless, travellers and gypsies. The inclusive target for land to meet locally identified housing need will vary, although it is likely to be within an indicative range of 30-50% of each housing development site. On sites released from the Green Belt, this proportion should be at or towards the higher end of this range.'

The proportion of different types of housing need will be informed by Housing Needs Surveys and any other relevant studies and reflected in Local Plan policies.

### **Definition of Key Worker (Chapter 5 and Glossary)**

We note that a definition for 'key worker' is included in the glossary. However, the definition should be informed by the definition given in recommendation 2, page 5 of the 'Research into Key Worker and Affordable Housing in the Cambridge Area' report produced by Cambridge Housing and Planning Research. (A copy of this study has been sent to the County Council).

## **CHAPTER 6 – SUPPORTING DEVELOPMENT**

### **Paragraph 6.3**

#### **OBJECT**

We are concerned that the first bullet point of this paragraph does not make sense. We object due to lack of clarity. We suggest that the bullet point is replaced by, 'encouraging developers to provide/enable the provision of infrastructure the need for which has been generated by their development'.

### **Policy P6/1 - Development-related Provision**

#### **OBJECT**

We would question whether it is possible to identify ALL infrastructure requirements in site-specific proposals in a Local Plan. This should be our aim but it is not always possible to plan for/or foresee everything required during a plan period in terms of infrastructure. Also, in part, infrastructure requirements are governed by the precise nature of the development that eventually comes forward for a particular site. We object due to lack of clarity. Reword the last sentence of the policy, 'Local Plans should include appropriate policies and identify the major infrastructure requirements in their site-specific policies, where these are known.'

**Paragraph 6.4**

## OBJECT

We would re-iterate our representation relating to Policy P6/1. We object due to lack of clarity. Rephrase the last sentence of the paragraph, 'Local Plans should include appropriate policies and identify the major infrastructure requirements in their site-specific policies, where these are known.'

Reference should be made to the cumulative impact of small developments and that all developments will need to contribute to infrastructure improvements. We object due to lack of clarity. Add additional sentence, 'The cumulative impact of small developments should be taken into account and therefore all developments will need to contribute to infrastructure improvements.'

**Policy P6/2 Local and Strategic Partnerships**

## OBJECT

Whilst we welcome the principle of consultation with regional and Local Strategic Partnerships regarding large-scale developments to ensure integration, we are unclear as to what the words 'and co-operate' add in this context. Ultimately, planning decisions rest with the planning authority and, in the light of the fact that this is a land use plan, addressing land use issues, this would not seem to be appropriate in this policy. We object to the inclusion of the words 'and co-operate'. Delete these words from the policy.

**Paragraph 6.7**

## OBJECT

We have concerns regarding the nature of the list of those who will be involved in Local Strategic Partnerships (LSP). Not all of those listed will necessarily be part of the Cambridge LSP and that matter is still open to debate with the partners. We object because we consider that this list is overly prescriptive, particularly for a Structure Plan that will need to withstand the test of time. Replace the last sentence with 'LSPs will involve local authorities, and representatives of other public, private, voluntary and community sectors.'

**Policy P6/3 - Flood Defence**

## SUPPORT

We generally agree with policy P6/3.

**Paragraphs 6.9 and 6.10**

## OBJECT

There would appear to be some contradiction in the accompanying paragraphs regarding development in the floodplain (6.9 and 6.10). Whilst paragraph 6.9 states that no new development will be permitted within functional floodplains, paragraph 6.10 implies that new development may be permitted in the floodplain. This should be clarified. We object due to lack of clarity. The paragraphs should make it clear what, if any, development is acceptable in the floodplain.

**Paragraph 6.11****OBJECT**

It is unclear who will be responsible for the maintenance of flood defences. In addition, it is unclear what mechanism will be used to secure the funding for the provision and maintenance of such defences. We object due to lack of clarity concerning funding and maintenance of flood defences. The last sentence of this paragraph should be re-worded to state, 'the provision and maintenance of flood defences that are required because of the development will be funded by the developer through a Section 106 agreement. Agreement must be reached between the Environment Agency, Local Planning Authorities, Anglian Water, the relevant Internal Drainage Board and the developer regarding the construction, adoption and maintenance of such defences.'

**OBJECT**

On the issue of flooding, the Structure Plan does not appear to include all the requirements of PPG25. The Guidance (PPG25, paragraph 49) states that the Structure Plan should identify the broad areas where flooding might occur. There is no reference to this in the Structure Plan. We object on the basis that this is an important omission from the Structure Plan.

**OBJECT**

The Structure Plan should also state what consideration has been given to the issue of flooding in preparing the Structure Plan and identifying areas for development (PPG25, paragraph 49). We object on the basis that this is an important omission from the Structure Plan.

**Policy P6/4 - Drainage****SUPPORT**

We generally welcome policy P6/4 and the accompanying text in paragraphs 6.12 and 6.13.

**Policy P6/5 - Telecommunications****OBJECT**

This policy and the accompanying paragraphs are very much promoting the development of telecommunications. We are concerned that no mention is made of the need to consider the visual impact of such proposals in accordance with paragraph 14 of PPG8. In addition, given the sensitivity of such proposals, it would be helpful to address public health concerns in either the policy or the accompanying paragraphs, perhaps by stating that if a proposed mobile phone base station meets the ICNIRP guidelines for public exposure it should not be necessary for a local planning authority to consider further the health aspects and concerns about them (paragraphs 29-31, PPG8). We object on the basis of no mention of visual impact or health issues. Reference should be made in the supporting paragraphs (6.14 and 6.15) to these concerns.

**Other Issues****OBJECT – Major Health Facilities**

We consider that there is insufficient guidance in relation to major health facilities, such as Addenbrooke's, Hinchingsbrooke and Papworth in the Structure Plan. In view of the importance of health facilities to the quality of life of residents, we

consider that the Plan should refer to the NHS plan for health provision in the sub-region over the medium to longer term. In a fast growing sub-region, the quantity of its health care facilities, their location and their accessibility are crucial issues. In relation to Addenbrooke's there are still doubts about whether the 2020 vision is achievable in view of its dependence upon a new railway station, RTS link and the access road from Hauxton Road to Addenbrooke's identified in policy P9/10.

## **CHAPTER 7 - RESOURCES, ENVIRONMENT AND HERITAGE**

### **Policy P7/1 - Sites of Natural and Heritage Interest**

#### **OBJECT**

We consider that this policy should relate to primarily smaller sites of environmental importance (the larger sites having been considered in policy P1/2). We consider that the wording of the first bullet point is unclear and also consider that common land and open space that contributes to the environmental quality of the local area should be mentioned in this context. We object due to the lack of clarity, and incomplete nature of this policy. We suggest that the first bullet point is re-worded to state, 'sites where a statutorily protected species is known to have existed and with appropriate management could again colonise the site'. We suggest that the second bullet point is transferred to policy P1/2. We also suggest the addition of two new bullet points to read, 'Common land' and 'Open space that contributes to the environmental quality of the local area'. Finally, it would be helpful to cross reference the protection of open space for environmental purposes with the protection of open space for recreational purposes (policy P4/3). Perhaps this cross reference could be included in the accompanying text.

### **Paragraph 7.5**

#### **OBJECT**

We note that City Wildlife Sites are omitted from paragraph 7.5. We object due to the importance of City Wildlife Sites in the context of the urban setting of Cambridge. We therefore suggest the addition of a bullet point stating '49 City Wildlife Sites.'

### **Policy P7/3 - Countryside Enhancement Areas**

#### **OBJECT**

Whilst we broadly welcome the concept of countryside enhancement areas, there is clearly a need for the enhancement of all of the Structure Plan area. More emphasis is needed on the links between high density urban areas, particularly to those with poor existing opportunities for non-vehicular access to the countryside such as Kings Hedges, Arbury, and Petersfield to areas of the greater countryside. We object to the lack of encouragement for the enhancement of links between urban areas and the countryside. Therefore, we suggest the addition of a third sentence to read, 'Good quality foot and cycle ways will be developed to link the Countryside Enhancement Areas to major urban areas in order to enhance access to the greater countryside for those without access to a car.'

### **Policy P7/4 - Landscape**

#### **OBJECT**

We note that the policy does not include reference to protecting and enhancing landscape features. We object due to the lack of clarity. We suggest the replacement of the words 'and contribute' with the following words, 'protecting and enhancing landscape features and contributing...'.

### **Figure 7.2 - Landscape Character Areas**

#### **OBJECT**

The figure currently shows an area of chalkland to the north east of Cambridge. We do not believe that there is chalkland to the north east of Cambridge and that the map is inaccurate. We suggest that the map is amended accordingly.

### **Paragraphs 7.16 and 7.17 Historic Built & Archaeological Heritage**

#### **OBJECT**

There is no policy relating to this section. See also our comment under Policy P1/2.

### **Figure 7.3 - Archaeological Zones**

#### **OBJECT**

We would question whether the current title of this figure, 'Archaeological Zones' is correct. Would not 'Specific Sites Associated with Geological Zones' be a better explanation? In addition, there also appears to be a contradiction between figures 7.2 and 7.3, particularly in respect of the location of chalkland. Amend title of figure 7.3 to more accurately reflect what the figure represents. Ensure extent of chalkland is accurately represented on figures 7.2 and 7.3.

### **Policy P7/6 - Renewable Energy Generation**

#### **OBJECT**

This policy should also refer to Energy from Waste and cross reference should be made to the Waste Local Plan Revised Deposit Draft (policy WLP17 and 26) concerning locations for Energy from Waste facilities.

#### **OBJECT**

There should be an additional policy to cater for non-renewable energy generation that should set broad criteria for their location.

### **Paragraph 7.26**

#### **OBJECT**

We note that there is no specific policy relating to water resources. In addition, we note that there is no cross- reference of Sustainable Urban Drainage Systems (SUDS) in policy P6/4 and paragraphs 6.12 and 6.13. We object due to the lack of a policy and cross-referencing. We recommend that consideration be given to inclusion of a policy relating to water resources. In addition, we recommend that the following wording is added at the end of paragraph 7.26, 'Drainage and Sustainable Drainage Systems are considered in policy P6/4 and paragraphs 6.12 and 6.13.'

## **CHAPTER 8 – MOVEMENT AND ACCESS**

### **Introduction**

#### **OBJECT**

This chapter lacks a credible overall transport strategy linked to land use and there is little to indicate that it contains policies based on evidence. There is a need for a

robust, implementable and comprehensive transport strategy that looks to the long term beyond 2016. The chapter should establish a clearer and stronger link between car travel demand management, additional highway capacity and public transport efficiency. In the worst-case scenario, a widening of the A14 could actually further increase congestion within Cambridge and could therefore be a threat to the reliability and the attractiveness of the rapid transit system and any conventional bus service. One way to avoid this worst-case scenario would be to use tools such as congestion charging or work place parking levy (which are included under fiscal policies policy P8/4) in addition to the reallocation of road space to sustainable modes of transport and the definition of stringent parking standards. Also see our comments on Policy P9/10 below.

### **Policy P8/5 – Provision of Parking**

#### **OBJECT**

Urban expansions extending into South Cambridgeshire but within the inner boundary of a revised Green Belt should have the same parking standards as those parts of the expansion that are within the City. Furthermore the policy is weak when it states that parking standards in Cambridge should not exceed those set out in PPG13 as maximum standards to apply across England. This is not adding anything to national guidance and would not be helpful when the Cambridge Local Plan review seeks to reduce those national standards.

Reword last section of the policy to read: 'Common parking standards will apply within the inner boundary of the Cambridge Green Belt. Local Planning Authorities will introduce lower maximum parking standards than those specified in PPG13 where these will assist in the implementation of the sustainable development strategy of the Structure Plan and implementation of Local Plan strategies'.

### **Policy P8/10 – Transport Investment Priorities**

#### **OBJECT**

We support the principle of a rapid transit system to serve the needs of the Cambridge Sub-Region but are concerned that it should serve the wider needs of a growing urban area as well as to relieve traffic on the A14 corridor. In this regard a guided bus system on the Huntingdon to Cambridge corridor has yet to be demonstrated to bring higher benefits than a conventional bus system running on dedicated road links between St Ives and Chesterton (on the disused railway line), using strong bus priority measures in the City Centre and onwards to Trumpington and Addenbrooke's (on the disused railway line). The City Council is yet to be convinced that the proposed guided bus system would be able address the needs of the proposed new settlement as well as meeting its original intention of relieving congestion on the A14. If greater capacity is required to both relieve existing congestion as well as providing for new development, light rail should be considered, particularly since there is more chance of this being able to utilise rail corridors in Cambridge.

Public transport links to the proposed new stations at Chesterton and Addenbrooke's should have a higher priority compared to car access and parking facilities in order to minimise long distance commuting and to protect local amenity.

The City Council supports the extension of the core traffic scheme. However, this extension should not be associated with additional cycle bans as this situation would be detrimental to cycle usage.

## **CHAPTER 9 – STRATEGY FOR THE CAMBRIDGE SUB-REGION**

### **Paragraph 9.9 – Vision for the Cambridge Sub-region**

#### **OBJECT**

The existing Strategy is inadequate as it currently stands (paragraph 9.9). It fails to provide a positive vision for the type of place Cambridge is to become over the Structure Plan period to 2016 or for how its future after 2016 is to be secured. In these respects the message given in paragraph 9.24 is to be preferred. Neither does it do justice to the importance of the built environment and urban green spaces to existing and future quality of life or to the importance of Cambridge as a centre for education.

A separate positive vision is needed, starting with a focus upon the City itself and moving out across the Sub-region.

The vision for Cambridge should be based upon the concept of a central core, with four nodal sub-centres; one to the north, east, south and west, linked together by high quality public transport. Each of these sub-centres should have a distinct role and character. The vision should refer to the need for sustainable city growth and the opportunity that this will provide for restructuring land uses within the City and the creation of important new landscapes offering improved public access and high visual and biodiversity quality together with opportunities to link urban and rural open space. Reference should be made to the opportunities for urban expansion to accommodate a range of uses, and to alleviate the current housing crisis in a sustainable manner thus creating a viable future for both the City and the wider sub-region. The future direction of the City growth will be shaped by a new Green Belt that will provide a quality setting to the City and protect rural areas from unsustainable growth. It may be helpful to represent this vision in the form of a diagram for inclusion in the Structure Plan.

More specifically, paragraph 9.9 fails to provide any guidance for the long-term development of the City beyond 2016 and so, when taken together with the provisions of paragraph 9.28, could result in a general peripheral expansion of the City to the detriment of its environment, amenity, the provision of new infrastructure and good planning. Paragraph 9.9 j) should be deleted and replaced with:

'Provides flexibility for development beyond 2016 by additional capacity from the large- scale eastern expansion of Cambridge. The rate of growth is to be continually monitored and planning and investment programmes will be adjusted according to the emerging needs of the Sub-region'.

### **Policy P9/2 – Housing Distribution Cambridge Sub-region**

#### **OBJECT**

The 6,500 target for the built up area of Cambridge depends to a significant degree upon development on the east side of the Cambridge Northern Fringe. If this did not proceed there could be pressure for higher densities on other sites or for more Green Belt land releases. The results of the Urban Capacity study currently

underway will inform our submission to the Structure Plan Examination in Public regarding this figure.

The reference in the policy and in paragraph 9.18 to at least 30% of the new housing being affordable etc., should be amended to make it consistent with the wording in Policy P5/4.

The reference to housing growth south of Cambridge being limited on the grounds that it is likely to lead to long distance commuting should be deleted. On this basis no new housing should be permitted within a 20-minute cycle ride of Cambridge Station or at Waterbeach, Ely, St Neots or Huntingdon. Furthermore it is not clear if this is a policy reference intended to restrain commuting to London or into Cambridge. If it is the former it is illogical; if the latter it is unsustainable.

It would also be helpful to include reference in the Plan to the need for additional housing around the sub-region, especially in and close to Cambridge, to cater for the demand for housing that has been, and will be, generated by the employment growth in the City of Cambridge.

### **Paragraphs 9.22 to 9.29**

#### **OBJECT**

Entitling a section of the Structure Plan 'Green Belt', which is concerned with the expansion of Cambridge is misleading and betrays a desire to favour the rural over the urban. Delete title 'Green Belt' between paragraphs 9.22 and 9.23 and replace it with 'Sustainable City Growth'. Reorder paragraphs to put paragraphs 9.24 and 9.25 first.

### **Policy P9/3a – Green Belt**

#### **Policy P9/3b – Review of Green Belt Boundaries**

#### **OBJECT**

The principal underpinning these policies is supported, which is that the development needs of Cambridge cannot be met without a review of the existing Green Belt to provide for a more sustainable pattern of future development.

However, the provisions of policy P9/3a could frustrate the review of the Green Belt as required by RPG if its provisions are to apply to the review itself as opposed to the post review period. The current wording is very restrictive and negative; it would be better to phrase this policy in a more positive manner. Confusion is caused by P9/3b where it states: 'In determining the boundaries of the areas to be released from the Green Belt the Local Planning Authorities will:

- Retain any areas required to maintain the essential purposes of the redefined Green Belt as set out in P9/3a'

The City Council believes that this means that the provisions of P9/3a only apply after the completion of the Green Belt review but it could also be taken to mean that the review itself is to be guided by the provisions of P9/3a.

This wording is confusing and introduces factors which go beyond those set down in Regional Planning Guidance 6 that refers to 'relevant green belt purposes' (policy 24). The five purposes for including land with green belts are set out paragraph 1.5 of PPG2. Recommend the deletion of the first bullet point of P9/3b and its

replacement with: 'retain any areas fulfilling relevant green belt purposes as referred to in RPG6 and as set out in paragraph 1.5 of PPG2 (1995)'.

### **Policy P9/3c – Location and Phasing of Development Land to be Released from the Green Belt**

#### **OBJECT**

The principal underpinning this policy is supported, which is that the development needs of Cambridge cannot be met without a review of the existing Green Belt to provide for a more sustainable pattern of future development.

However it's meaning is unclear in places and could be improved. At the top of the second column of the policy it refers to the 'fundamental purposes of the Green Belt' when these are nowhere defined in the Structure Plan. If the intention is to refer back to policy P9/3a this should be stated. However that could not be supported by the City Council as it could be used to oppose any long term solution to the growth of Cambridge beyond 2016 which does not rely on further general peripheral expansion all around the City but which rather concentrates development to the east. 'Relevant green belt purposes' is the terminology used in Regional Planning Guidance 6 (Policy 24) whilst the purposes for including land in green belts is set out in paragraph 1.5 of PPG2. Therefore, delete 'whilst maintaining the fundamental purposes of the Green Belt' and replace it with 'whilst continuing to fulfil relevant green belt purposes as referred to in RPG6 and as set out in paragraph 1.5 of PPG2 (1995)'.

The proposed joint study of the eastern expansion option referred to in the policy and in paragraph 9.26 cannot be hamstrung by requiring it to be done by all three local authorities when one does not want to cooperate. Furthermore its wording needs to be amended to be consistent with the proposed changes to policy P9/3c. Amend paragraph 9.26 to read 'Realisation of the vision will require a clear view of the long-term developments within a redefined inner Green Belt boundary and will require careful phasing. An early study will be commissioned to define the contribution which land to the east of Barnwell Road can make whilst fulfilling relevant green belt purposes'. Delete remaining text.

### **Paragraph 9.24**

#### **OBJECT**

We object to the wording of the last sentence because we consider that master plans are imperative to the development of these expanded communities. Therefore we suggest that the word 'will' is substituted for the word 'may'.

### **Paragraph 9.28**

#### **OBJECT**

This indicates that enough land should be released from the Green Belt in the next Local Plan reviews of the Cambridge and South Cambridgeshire Local Plans to match that provided for to 2016 (6,000 in Cambridge and 2,000 in South Cambridgeshire). This assertion cannot be supported other than in the context of the findings of the eastern expansion study and the availability of Cambridge Airport for development. The City Council is opposed to an ongoing process of peripheral expansion which would be to the detriment of its environment, amenity, the provision of new infrastructure and good planning. The following sentence should be added to

the end of the paragraph: 'It is expected that such capacity could only be found from the development of Cambridge Airport and land further to the east of the City'.

### **Policy P9/4 – New Settlement**

#### **OBJECT**

It is proposed to build a new settlement at Longstanton/Oakington with an ultimate capacity of 8,000-10,000 homes, and 6,000 by 2016. A start on site by 2006 is called for. The settlement will include employment and other land uses appropriate to its size. The provision of necessary infrastructure including public transport links will be set out in a masterplan. The County Council chose this location for the new settlement after assessing alternatives including the eastern expansion of the City and Waterbeach. The eastern expansion was not a leading contender for the period before 2016 due to doubts about the availability of the Airport site. Longstanton/Oakington was preferred over Waterbeach because it was judged to be marginally superior on a wide range of criteria.

The County considered transport to be a key factor in their choice of location with Longstanton/Oakington preferred because of its greater certainty of delivery. The testing of this decision will rely on detailed expert evidence to the Structure Plan EiP.

It remains the case that the eastern expansion of Cambridge remains the preferred option for the City Council to accommodate the new settlement growth target identified in the Structure Plan. It recognises however that the timescale for delivery of large-scale development on the airport site is uncertain at present because of the need to relocate the airport business, and it therefore accepts that a new settlement may be necessary within the Plan period. However, the merits of Oakington/Longstanton in comparison with the other potential sites, especially as regards transport, have not yet been satisfactorily established and the City Council is therefore unable to endorse this or any other specific location for the new settlement at this stage. For these reasons it may support a new settlement in the Cambridge Sub-Region but not yet at any specific location. It will be concerned to test the advantages and disadvantages of alternative locations in respect of their relationship with Cambridge through the Structure Plan EiP. In particular it will expect the EiP to consider the following criteria to assist in its assessment of alternative new settlement locations:

- To what degree does the development minimise the generation of car journeys especially to Cambridge locations?
- To what degree is the development able to access/deliver high quality public transport to, into and through Cambridge?
- To what degree will the development tend to improve the quality of life of residents of Cambridge and the sub-region in terms of housing affordability and access to open space?
- To what degree is the development compatible with the Sustainable Development Strategy Objectives set out in Chapter 1?
- To what degree will the development help to secure the boundary of the Cambridge Green Belt post 2016?

### **Policy P9/6 – Economic Regeneration of Chatteris**

#### **OBJECT**

We are not convinced that Chatteris should be included within the Cambridge sub-region, particularly in view of its poor transport links to Cambridge. In our opinion, Littleport has a better case for inclusion in the sub-region, especially due to its location on the railway line to Cambridge.

### **Policy P9/7 – Promotion of Clusters**

#### **OBJECT**

Comments on cluster development and expansion have been set out in our comments on Policy P2/4 which are applicable to the whole Structure Plan area. Any changes made in regard to Policy P2/4 should be reflected in Policy P9/7.

### **Policy P9/8 – Selective Management of Employment Development**

#### **OBJECT**

The principle behind this policy is supported but there are concerns about the detailed wording of the policy. First, it is unclear as to the geographical applicability of the policy in between the statements in paragraphs 9.44 and 9.45, the reference to Cambridge in P9/8c) and to the market towns in the concluding policy section. Second, it is too strict a policy for much of the Cambridge Sub-region and could hamper growth. Third, it fails to give recognition to the regional role of Cambridge in the Eastern Region.

It is recommended that the policy and supporting text be amended as follows:

Reword P9/8c to read: 'the provision of office or other development providing an essential service for Cambridge as a local, sub-regional or regional centre'. The supporting text should define what is meant by the words 'essential service'.

Delete the concluding policy section starting 'Employment development....'

Reword paragraph 9.44 to read 'Employment land within the inner boundary of the revised Cambridge Green Belt will be reserved for development which can demonstrate a clear need to be located in Cambridge in order to serve local, sub-regional or regional requirements. Firms that do not meet these criteria will be encouraged to locate elsewhere in the Sub-region.'

Make other consequent changes to the supporting text including the deletion of paragraph 9.45.

### **Policy P9/9 – Infrastructure Provision**

#### **SUPPORT**

This policy establishes a sub-regional approach to the provision of the infrastructure needed to support the development strategy including the collection and disbursement of planning obligations via a joint partnership mechanism as proposed by the 'Implementing the Cambridge Sub-Regional Strategy' report of October 2001 which has been formally endorsed by the City Council. The proposed changes to the planning system arising from the Planning Green Paper are likely to enable such an approach.

### **Policy P9/10 – Cambridge Sub-Region Transport Strategy**

#### **OBJECT**

There is insufficient linkage between the development / land use strategy of the plan and its transport strategy and transport infrastructure proposals. The transport strategy for the sub-region needs to look to the long term beyond 2016. Before putting forward transport infrastructure schemes, there should have been an assessment made of the additional travel needs that the urban expansions of Cambridge are likely to generate and from there a modelling of different transport infrastructure scenarios, based on a combination of public transport and car traffic generation models (as conducted in the CHUMMS study for the A14 corridor). This has been partially done for the Southern Fringe and more of this work will be needed for each quadrant of the City where development is being proposed in time for it to be examined at the EiP. The outcome of these studies could reveal a need for a different development strategy and or for a different balance of transport infrastructure than that given in Policy P9/10. This work is also required to identify when these improvements should take place in regard to the phasing and scale of development being proposed in each quadrant of the City. The speed at which this work can be done will determine when the infrastructure can be provided and so will be crucial to the pace of development on the City fringe. Please also see our comments in Chapter 8 and paragraph 9.9.

### **Policy P9/11 – Retail Provision in Cambridge**

#### **Paragraph 9.53**

##### **OBJECT**

The policy on retail provision refers to 'major Sub-regional shopping provision' whilst the supporting text in paragraph 9.55 refers to major shopping provision thus introducing an element of confusion which could have implications for the urban extensions. It is recommended that the following changes are made to clarify this situation: Delete the words 'Sub-regional' from Policy P9/11 so that it would read 'There will be no further need or requirement for major shopping provision in the Structure Plan period...'

#### **Paragraphs 9.23 and 9.57**

##### **OBJECT**

Paragraph 9.23 sets a maximum of 10,000 sq m. of comparison retail floorspace to be provided in Cambridge on the sites to be released from the Green Belt and to housing areas being supported by necessary facilities including shopping. It would be more appropriate to move this from paragraph 9.23 dealing with the Green Belt to paragraph 9.57 which deals with retail provision in Cambridge. Furthermore some additional flexibility will be required to accommodate extra provision at Cambridge Airport given the potential scale of development there and further to the east.

Paragraph 9.57 would then read as follows: 'There will be a need for shopping provision the new settlement (see Policy P9/4) and in the Cambridge urban expansions (See Policy P9/3c). This should be of an appropriate scale to meet the local needs of its residents, but not have an adverse impact on any of the established centres covered by Policy P3/1'. Any retail component in the Cambridge urban expansions should not exceed 10,000 sq metres of comparison floorspace subject to the appropriate level and nature of retail provision on the Cambridge Airport site being dependent upon the outcome of the joint study of the eastern expansion of Cambridge referred to in Policy P9/3c.'Make appropriate alterations to paragraph 9.23.

**Additional Comment**

OBJECT – Major Urban Regeneration Opportunities within Cambridge

The plan says nothing about the major urban regeneration opportunities within Cambridge around the railway station and on the Cambridge Northern Fringe (East), which includes Chesterton Sidings in South Cambridgeshire. These areas are suitable for intensive mixed-use development which would be of a strategic scale. Reference to them should be made in the supporting text relating to Policy P9/1 dealing with the development strategy for the Cambridge Sub-region.

**Cambridge Inset Map**

OBJECT

The inset map is deficient in the following matters which need to be addressed. First, by showing the existing Green Belt boundary in detail it will be seriously misleading when parts are taken out through Local Plan reviews. Second, the RTS notation should be extended to provide linkages to the expansion sites to the west via lands to be removed from the Green Belt, to the east to serve the Airport and points east and to the south to serve Addenbrooke's. Third, the map appears to show that heavy rail is to be reinstated on the St Ives line, if this is not the case the RTS route in this northern quadrant will need to be redrawn. Fourth, the inset gives no recognition to the development potential of either of the Cambridge Northern Fringe (East) or of the lands around Cambridge railway station which should both be identified as strategic sites for mixed use urban regeneration (see also our comment in relation to Policy P2/3). Fifth, Cambridge Airport should be identified as a strategic site for employment development (as it is in paragraph 2.27).

**CHAPTER 10 - STRATEGY FOR PETERBOROUGH AND NORTH CAMBRIDGESHIRE**

No comments.

**CHAPTER 11 – KEEPING TRACK OF PROGRESS**

SUPPORT – Provision of a structure to monitor the effectiveness of the Plan

We welcome the provision of a structure to monitor the effectiveness of the Plan. We would comment that a coordinated approach to monitoring is needed within the County, preventing duplication of work by both the County Council and District authorities that could also lead to differences in figures for the same or similar indicators.

OBJECT – Long and complex policies

The policies throughout the Structure Plan would appear to be long and complex, and therefore it is likely to be difficult to accurately monitor the policies in their own right. The measurement of the effectiveness of specific policies does not appear to be addressed. We object due to the lack of commitment to monitor the effectiveness of individual policies.

**Table 11.1**

OBJECT

It is difficult to comment constructively upon the Indicators when the targets are still to be developed. We object due to lack of clarity.