



NORTH WEST CAMBRIDGE AREA ACTION PLAN

SELF ASSESSMENT OF SOUNDNESS & STATEMENT OF CONSULTATION

2008

PREPARED JOINTLY BY CAMBRIDGE CITY COUNCIL & SOUTH
CAMBRIDGESHIRE DISTRICT COUNCIL

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1. INTRODUCTION

Purpose of the Statement

- 1.1 This statement has been developed to provide information relating to how the North West Cambridge Area Action Plan is in accordance with the 'Tests of Soundness' (see Part I of this statement and Appendix A) and to meet the requirements of regulation 28 (1) (c & d) of the Town and Country Planning (Local Development) (England) Regulations 2004 (hereafter referred to as 'The Regulations') (See Part II of this statement).
- 1.2 The purpose of Part I of this statement is to provide a self assessment of how the North West Cambridge Area Action Plan meets the nine tests of soundness as outlined below. In developing this consideration has been given to the Planning Advisory Service Self-Assessment toolkit. The tests of soundness, as set out in paragraph 4.42 of Planning Policy Statement 12, are:

Procedural

- Test I - The Area Action Plan has been prepared in accordance with the Local Development Scheme;
- Test II – The Area Action Plan has been prepared in compliance with the Statement of Community Involvement (SCI), or with the minimum requirements set out in the Regulations where no SCI exists;
- Test III – The plan and its policies have been subject to Sustainability Appraisal;

Conformity

- Test IV – It is a spatial plan which is consistent with national planning policy and in general conformity with the Regional Spatial Strategy for the region, or the Spatial Development Strategy if in London, and it has properly had regard to any other relevant plans, policies and strategies relating to the area or to adjoining areas;
- Test V – The Area Action Plan has had regard to the authorities' community strategies;

Coherence, consistency & effectiveness

- Test VI – The strategies/policies/allocations in the plan are coherent and consistent within and between Development Plan Documents prepared by the authorities and by neighbouring authorities, where cross boundary issues are relevant;
 - Test VII – The strategies/policies/allocations represent the most appropriate in all the circumstances, having considered the relevant alternatives, and they are founded on a robust and credible evidence base.
 - Test VIII – There are clear mechanisms for implementation and monitoring;
 - Test IX – The Plan is reasonably flexible to enable it to deal with changing circumstances.
- 1.3 Part II of this report is the Statement of Consultation. In essence, the statement sets out the following information for each stage of consultation:

Issues & Options Consultation (Regulation 25)

- The bodies, both statutory and other stakeholders, consulted as part of the consultation;
- How these bodies were consulted;
- A summary of the main issues raised as part of the consultation; and
- How these issues have been addressed in the Area Action Plan.

Pre-Submission Consultation (Regulation 26)

- The number of representations made to the consultation;
- A summary of the main issues raised as part of this consultation; and
- How these issues have been addressed in the Area Action Plan.

PART I: SELF ASSESSMENT OF SOUNDNESS

2 BACKGROUND TO THE NORTH WEST CAMBRIDGE AREA ACTION PLAN & COMPLIANCE WITH THE TESTS OF SOUNDNESS

Introduction

- 2.1 The Cambridgeshire and Peterborough Structure Plan (2003) identifies a number of locations on the edge of Cambridge for development to 2016 and beyond. In North West Cambridge, one of the locations identified is land between Madingley Road and Huntingdon Road. The land lies within both Cambridge City and South Cambridgeshire District Council areas and good planning requires the two authorities to work together on a joint plan to ensure a comprehensive, high quality development. Work on the Area Action Plan started in October 2005.
- 2.2 The Area Action Plan for North West Cambridge identifies land to be released from the Cambridge Green Belt to contribute towards meeting the development needs of the University of Cambridge. It establishes an overall vision and objectives to achieve this. It also sets out the policies and proposals to guide the development as a whole. The site will provide approximately 2,000 to 2,500 dwellings of which 50% will be affordable housing for University Key Workers. 2,000 units of student accommodation will also be provided, along with employment development and a new local centre, which will act as a focus for the development.
- 2.3 In accordance with Planning Policy Statement 12 (PPS12) all Local Development Documents, such as the North West Cambridge Area Action Plan, must be soundly based in terms of their content and the process by which they are produced. The policies and proposals in the Area Action Plan will be tested thoroughly during an independent examination, the purpose of which is, in part, to determine whether the document is sound.
- 2.4 There is no legal definition of 'sound' but in this context it is taken to mean 'showing good judgement' and 'able to be trusted'. The presumption is that a document is sound unless it is shown to be otherwise at examination. The Area Action Plan will be considered to be sound if it meets the Tests of Soundness as detailed in the following sections, which cover issues of procedure, conformity and coherence, consistency and effectiveness. The purpose of the following sections of this statement is to provide a self assessment of the Area Action Plan's performance against these Tests Of Soundness.

Tests I and II - Conformity with the Local Development Scheme and Statement of Community Involvement

- 2.5 The Area Action Plan will form part of the Development Plan for Cambridge City and South Cambridgeshire District Councils, and as such has been

identified in the Councils' Local Development Schemes (LDS). The Area Action Plan has been produced in accordance with the milestones established in these schemes, with submission on the 19 May being slightly ahead on the LDS milestone date of June 2008.

- 2.6 South Cambridgeshire District Council has yet to produce a Statement of Community Involvement. PPS12 states that "where the local planning authority has yet to produce a Statement of Community Involvement, it must comply with the minimum requirements set out in the Regulations and ensure the community is able and encouraged to participate throughout the preparation process of Local Development Documents." Throughout the process of preparing the Area Action Plan, the Council has met the minimum requirements for consultation/participation, as set out in the Regulations, and detailed in Part II of this document.
- 2.7 Cambridge City Council has an adopted Statement of Community Involvement¹ (SCI), and as such consultation, which is detailed in Part II below, has been carried out in accordance with the information set out in the SCI. A copy of this document will be sent to the Secretary of State on submission of the Area Action Plan, along with the other documents outlined in section 28(1) of the Regulations.

COMPLIANCE WITH TESTS OF SOUNDNESS

Paragraph 2.5 above shows that the North West Cambridge AAP meets Test of Soundness (i) – Produced in accordance with the Local Development Scheme.

Evidence: Cambridge City Council Local Development Scheme (March 2007)
South Cambridgeshire District Council Local Development Scheme (July 2007)

Paragraphs 2.6 – 2.7 shows that the North West Area Action Plan meets Test of Soundness (ii) – Compliance with the Statement of Community Involvement.

Evidence:

- Cambridge City Council Statement of Community Involvement (2007)
- Part II of this document
- Correspondence with consultees
- Committee Reports

¹ Cambridge City Council (2007), Statement of Community Involvement: A Consultation Strategy for Planning in Cambridge.

Test III - Sustainability Appraisal

- 2.8 In accordance with the Planning and Compulsory Purchase Act 2004, the Area Action Plan has been subject to Sustainability Appraisal (SA) at all stages of its development. The SA process also incorporates the requirement of the European SEA Directive (Directive 2001/42/EC), which came into force in England on the 21st July 2004.
- 2.9 The purpose of the SA is to test the policies and proposals contained within the Area Action Plan against economic, social and environmental objectives. Where appropriate, the recommendations of the SA reports have been incorporated into the Area Action Plan. At each stage of consultation, the SA was made available for public consultation in accordance with legislation and guidance.

COMPLIANCE WITH TESTS OF SOUNDNESS

Paragraphs 2.8 – 2.9 show that the North West Cambridge Area Action Plan meets Test of Soundness (iii) – Subject to Sustainability Appraisal

Evidence:

- Issues & Options Interim SA Report (June 2006)
- North West Cambridge Area Action Plan Site Footprint Assessment (2007)
- Sustainability Appraisal of the North West Cambridge Area Action Plan – Preferred Options Stage (September 2007)
- Sustainability Appraisal of the North West Cambridge Area Action Plan – Submission Draft Stage (March 2008)

Tests IV and V - National and Regional Context

- 2.10 PPS12 makes it clear that spatial planning goes beyond traditional land-use planning to bring together and integrate policies for the development and use of land with other policies and programmes which influence the nature of places and how they function. The Area Action Plan can, by this definition, therefore be considered to be a spatial plan as it brings together a range of topic areas to provide a strategic plan to guide development, the provision of appropriate services and infrastructure and Masterplanning at North West Cambridge.
- 2.11 The Government has identified the Cambridge Area as falling within the London-Stansed-Cambridge-Peterborough Growth Area in its Sustainable Communities Plan. The Area Action Plan has been prepared in accordance with national, regional and local policies. The location is identified in Policy P9/2c of the Cambridgeshire and Peterborough Structure Plan (2003) as one where land should be released from the Green Belt for housing and mixed-use development and reserved for predominantly

University-related uses. This policy is consistent with current Regional Planning Guidance 6 (RPG6) as well as the emerging Regional Spatial Strategy for the East of England and has been saved as of 27th September 2007. In accordance with section 30(1) of the Regulations, a request will be made to the East of England Regional Assembly regarding conformity with the Regional Strategy on the same day that the Area Action Plan is submitted to the Secretary of State.

- 2.12 With regards to the national context, this is set out in Planning Policy Statements, Planning Policy Guidance Notes, Circulars and other advice from Central Government. In accordance with the requirements set out in Planning Policy Statement 12 and its guidance paper, policies in the Area Action Plan are in conformity with national planning policies, although to ensure clarity they do not repeat the advice given in these documents. The Government Office for the East of England (GO-East), as well as other key statutory Consultees, have been consulted on all stages of the Area Action Plan and have made no representations regarding fundamental inconsistencies with national planning policy.
- 2.13 The Area Action Plan has also had regard to various other strategies prepared by other bodies, such as the regional housing and economic strategies, waste strategies and transport plans and the Councils' Community Strategies. The Area Action Plan has also had regard to Cambridge City and South Cambridgeshire's Community Strategies. These community strategies, prepared respectively by the Cambridge Local Strategic Partnership and South Cambridgeshire Local Strategic Partnership, set overall visions for improving quality of life for people living in Cambridge City and South Cambridgeshire over the long-term and identify areas for action in the short-term. The North West Cambridge Area Action Plan will play an important role in securing those parts of Community Strategies that relate to development or the use of land and buildings.

COMPLIANCE WITH THE TESTS OF SOUNDNESS

Paragraphs 2.10 – 2.12 show that the North West Cambridge Area Action Plan meets Test of Soundness (iv) – Conformity with national planning policy and the Regional Spatial Strategy

Evidence:

- Planning Policy Statements/Planning Policy Guidance Notes/Circulars
- Government Office for the East of England Representations
- Correspondence from the East of England Regional Assembly
- Regional Planning Guidance 6 for East Anglia (RPG6)
- East of England Plan – The Secretary of State's Proposed Changes and Further Proposed Changes to the Draft Revision to the Regional Spatial Strategy for the East of England
- Regional Economic Strategy
- Regional Housing Strategy
- Cambridgeshire & Peterborough Structure Plan (2003)
- Cambridgeshire Transport Plan 2001 – 2006
- Cambridgeshire Waste Local Plan

COMPLIANCE WITH THE TESTS OF SOUNDNESS

Paragraph 2.13 shows that the North West Cambridge Area Action Plan meets Test of Soundness (v) – have regard to the Community Strategies

Evidence:

- Cambridge Local Strategic Partnership (2004), A Community Strategy for Cambridge
- The Community Strategy for South Cambridgeshire (2004)
- Cambridge Local Strategic Partnership (2008), Cambridge Sustainable Community Strategy
- South Cambridgeshire Sustainable Community Strategy (2008)

Test VI - Coherence and Consistency with other Development Plan Documents

- 2.14 The Councils are confident that the policy framework of the Area Action Plan is coherent and consistent with its spatial vision and objectives, which are themselves derived from identified social, economic and environmental issues facing the Cambridge area.
- 2.15 The Area Action Plan must be in conformity with Development Plan Documents prepared by the Councils as part of their Local Development Frameworks. As of yet, Cambridge City Council does not have an adopted Core Strategy. Policies 9/2, 9/3, and 9/7 of the Local Plan refer to development at North West Cambridge. Policy 9/1 of the Local Plan allows for further policy/guidance to be prepared for land at North West Cambridge. It should be noted that when the Area Action Plan is adopted, Policy 9/7, Proposal Site's 9.07 and 9.11 of the Local Plan will be superseded. Cambridge City Council and South Cambridgeshire District Council have recently adopted the Cambridge East Area Action Plan, which was prepared jointly to provide planning policy guidance for another urban extension to Cambridge.
- 2.16 South Cambridgeshire District Council adopted its Core Strategy in January 2007. The Area Action Plan is considered to be in general conformity with the Core Strategy, in particular policy ST/2 which gives preference for new housing on the edge of Cambridge. South Cambridgeshire District Council has also adopted a number of other development plan documents including three Area Action Plans, Development Control Policies DPD and the Proposals Map. The Site Specific Policies DPD was also submitted to the Secretary of State at the same time as the above plans and is currently undergoing examination. It is important that all documents that make up the Local Development Framework are read alongside each other, for example, the Area Action Plans and Site Specific Policies set out locationally

specific policies, whilst the Core Strategy and Development Control Policies provide district-wide policies.

- 2.17 All adjacent Districts have been consulted at all stages in the development of the Area Action Plan. At no stage have any concerns been expressed that the plan would conflict with the aspirations of these authorities.

COMPLIANCE WITH THE TESTS OF SOUNDNESS

Paragraphs 2.14 – 2.17 show that the North West Cambridge Area Action Plan meets Test of Soundness (vi) – Policies are coherent and consistent.

Evidence:

- Cambridge City Local Plan, 2006
- South Cambridgeshire Core Strategy, 2007
- South Cambridgeshire LDF Documents
- Consultation correspondence with adjoining districts

Test VII - Consideration of Issues and Relevant Alternatives

- 2.18 The North West Cambridge Area Action Plan is designed to address a range of social, environmental and economic issues. These issues have been highlighted from the outset in the Cambridge and South Cambridgeshire Community Strategies and the Issues and Options and Preferred Options Consultation documents. From the consultation responses received, it is considered that all of the key issues have been identified.
- 2.19 The Issues and Options Report identified a range of options for each of the key issues on site for consultation. The scope for strategic choices in particular was limited by the specificity of policies in the Regional Planning Guidance (RPG6) and the Cambridgeshire & Peterborough Structure Plan 2003. As a result of the Issues and Options Consultation and information contained in the various background documents that form the evidence base, the options were refined down to a preferred option and an audit trail was developed to highlight the reasons for choosing particular options and rejecting other options. This audit trail (Volume 2 of the Preferred Options Report) was made available as part of the Preferred Options consultation. An updated version that includes the results of the Preferred Options consultation and any changes to the Submission Draft Area Action Plan is contained in Appendix G of this document. The Councils are confident that the North West Cambridge Area Action Plan has been produced in a thorough and iterative manner. On the basis of evidence including local aspirations, the policies represent the most appropriate approach for this site.

COMPLIANCE WITH THE TESTS OF SOUNDNESS

Paragraphs 2.18 – 2.19 show that the North West Cambridge Area Action Plan meets Test of Soundness (vii) – Policies are most appropriate in all circumstances, are founded on a robust and credible evidence base, and relevant alternatives were considered.

Evidence:

- Planning Policy Statements/Planning Policy Guidance Notes/Circulars
- Legislation
- Government Office for the East of England Representations
- Regional Planning Guidance (RPG6) for the East of England
- East of England Plan – The Secretary of State’s Proposed Changes and Further Proposed Changes to the Draft Revision to the Regional Spatial Strategy for the East of England
- Cambridge Local Strategic Partnership (2004), A Community Strategy for Cambridge
- The Community Strategy for South Cambridgeshire (2004)
- Cambridge Local Strategic Partnership (2008), Cambridge Sustainable Community Strategy
- South Cambridgeshire Sustainable Community Strategy (2008)
- Cambridge City Local Plan, 2006
- South Cambridgeshire Core Strategy, 2007
- North West Cambridge Development of Preferred Options, Preferred Options Volume 2, October 2007
- Supporting Documents
- Sustainability Appraisal of the North West Cambridge Area Action Plan – Submission Draft Stage (March 2008)
- Annual Monitoring Reports
- Committee Reports

Test VIII – Implementation and Monitoring

- 2.20 The North West Cambridge Area Action Plan includes separate chapters dealing with implementation and monitoring. These sections include policies dealing with Phasing and Need and Infrastructure Provision, the Housing Trajectory and Core and Local Output Indicators for North West Cambridge. These indicators will inform the production of the Councils’ Annual Monitoring Reports. Monitoring provides information on the performance of policy, the delivery of development and impacts on the environment. It will help the local planning authorities to assess whether their plans remain sound or whether adjustments need to be made to continue to meet the plan’s objectives.

2.21 Cambridgeshire Horizons are assisting the local authorities with mechanisms to ensure prompt and efficient delivery of the major developments and necessary infrastructure. There is a recognised urgency to ensure that plans are in place to increase the rate of housing development and in particular to bring forward the major developments to meet the needs of the Cambridge area. Various partnership working arrangements have been in place for the major developments since around the time of the adoption of the Structure Plan for most of the major developments. These include Member Reference Groups, Officer Steering Groups and topic groups to facilitate further partnership working with the main stakeholders on key issues such as community facilities and drainage. In the case of North West Cambridge, an initial joint Member, Officer and University Working Group was replaced by a Joint Member Reference Group, Joint Working Group, Officer Steering Group and several topic groups. The Joint Working Group includes both the University of Cambridge and David Wilson Estates, who are the developer for an urban extension in an adjacent part of North West Cambridge between Huntingdon Road and Histon Road (the NIAB site), in order to ensure a holistic approach to the development of this quarter of the City. A Cambridge Fringe Sites Delivery Board, chaired by Cambridgeshire Horizons, has also focussed on North West Cambridge at alternate meetings. This approach will help the landowners/developers to develop the plans and strategies required by the various policies of the Area Action Plan, with full and early input from the local authorities and key stakeholders to ensure they are capable of being approved and delivered.

COMPLIANCE WITH THE TESTS OF SOUNDNESS

Paragraphs 2.20 – 2.21 show that the North West Cambridge Area Action Plan meets Test of Soundness (viii) – Clear mechanisms are in place for implementation and monitoring.

Evidence:

- Submission Draft North West Cambridge Area Action Plan
- Annual Monitoring Reports

Test IX - Flexibility

2.22 The North West Cambridge Area Action Plan forms part of the Cambridge City Council and South Cambridgeshire District Council Local Development Frameworks. The composition of these frameworks as a series of documents allows them to be kept up to date, as those parts of the framework that require review or replacement can be changed without requiring a review of the entire framework. However, it is important that the documents that make up the Local Development Framework are read alongside each other.

2.23 In terms of style, format and content, the Area Action Plan has been prepared to provide a balance between flexibility and providing a sufficient level of detail to make clear the requirements for North West Cambridge to assist in speeding up the planning application process and delivery. The Area Action Plan plans for development holistically, including development beyond 2016. This approach will ensure that the document is able to address the vision and objectives for Cambridge and South Cambridgeshire, based on the issues and challenges faced by the Cambridge Area.

COMPLIANCE WITH THE TESTS OF SOUNDNESS

Paragraphs 2.22 – 2.23 show that the North West Cambridge Area Action Plan meets Test of Soundness (ix) – Plan is flexible to deal with changing circumstances.

Evidence:

- Submission Draft North West Cambridge Area Action Plan (Monitoring Chapter)
- Annual Monitoring Reports

PART II: REGULATION 28 SUBMISSION STATEMENT

3. ISSUES AND OPTIONS CONSULTATION (REGULATION 25)

- 3.1 Consultation on the North West Cambridge Issues and Options Report took place for six-weeks between the 25th September and the 6th November 2006. The document was sent to a wide range of consultees, including local organisations and interest groups as well as Statutory Consultees as listed in Appendix B. In accordance with the Regulations (Regulation 24), these bodies subsequently became 'DPD Bodies' and have been consulted on each subsequent round of consultation on the Area Action Plan.
- 3.2 Although not a requirement of Regulation 25 of the Town and Country Planning Regulations 2004, the Councils agreed that as the AAP would have a significant impact on the area, it was important to engage the public as well as the specific and general consultation bodies (or key stakeholders). This would also be consistent with the emphasis on early public participation in the plan making process. The public were therefore advised by press releases and formal public notices in the press and invited to comment on the issues and options raised by the AAP, and copies of the AAP were also sent to a number of public libraries. A copy of the notice of consultation is provided in Appendix C. In addition, a summary leaflet was delivered to 10,342 households in the part of the City between Huntingdon Road and Madingley Road and in the villages of Coton, Girton and Histon/Impington.
- 3.3 Three exhibitions were held to assist in engaging the public in the Area Action Plan process, as outlined in the table below. These were manned by Officers of Cambridge City Council, South Cambridgeshire District Council and the County Council. The exhibitions also included the University (who showed their emerging Masterplan), David Wilson Estates (who showed their then emerging planning application on land between Huntingdon Road and Histon Road), and Cambridgeshire Horizons.

Table 1: Details of Exhibitions Held for the Issues & Options Consultation

Date & Time	Exhibition Location
Friday October 6 th 2006, 2-8.30pm	The Pavilion, Girton Recreation Ground, Girton
Tuesday, October 10 th 2006, 2-8.30pm	The Pavilion, University Sports Ground, Wilberforce Road, Cambridge
Monday, October 23 rd 2006, 2-8.30pm	The Auditorium, Fitzwilliam College, Storey's Way, Cambridge

- 3.4 The Councils also set up an interactive website to assist access to the document and to facilitate making responses online. A total of 701 representations were received to the Issues and Options Consultation, with

70% of these being submitted via the interactive website. The breakdown of these representations is shown in the table below.

Table 2: Breakdown of representations received to the Issues & Options Consultation.

219 Supports	291 Objections	191 Comments
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Summary of the main issues raised and how these have been dealt with

Site Footprint

- 3.5 It was clear from the responses to the Issues and Options Report that the site footprint of the development at North West Cambridge was one of the most important issues for Consultees. In the responses, the University had indicated that it supported Option 10.1, which had been based on its 2005 draft masterplan but that it could accommodate most of its requirements on the slightly lower site footprint set out in Option 10.2. It also put forward an alternative site for consideration. On the other hand, local Parish Councils and residents groups favoured the smaller scale development in Option 10.5. It was clear that none of the published Options fully met the requirements of all key consultees. The Sustainability Appraisal also indicated that there were a number of conflicts which remained unresolved in these Options.
- 3.6 Given the significance of the site footprint, a considerable amount of further work was carried out in order to address the way forward for the draft Area Action Plan. Site assessment criteria were developed in order to assess the merits of the five site footprint options presented in the Issues and Options Report. The draft site assessment criteria were sent to local key stakeholders, including Cambridgeshire County Council, the University of Cambridge, local Parish Councils, local interest groups and residents associations for consultation, which ran from the 23rd April to the 4th May 2007. As a result, a number of refinements were made to the criteria, although there was general support for the approach being taken. A further five options (A-E) were also developed and assessed using the site assessment criteria, and were also subject to Sustainability Appraisal. As a result of this work, the Councils concluded that site option E should be carried forward to the Preferred Options Report. Full details of this work can be found in the background document to the Area Action Plan "NW Cambridge Area Action Plan Site Footprint Assessment".

Further Issues

- 3.7 Of the other representations made, the most significant number of representations relate to transport, the provision of a secondary school, and whether its playing fields should be located in the Strategic Gap, the

provision of renewable energy and sustainable drainage. A summary of the main points raised in relation to these and how these were dealt with is provided in the table below. Further details of the way in which responses were dealt with in the drafting of the Preferred Options Report is provided in Volume 2 of the Submission Draft Area Action Plan and Appendix G of this statement.

Table 3: Summary of the Main Issues Raised in Relation to the Issues & Options Consultation.

OPTION	KEY ISSUES	PREFERRED APPROACH
Option 13.1: All purpose route within Green Corridor	<ul style="list-style-type: none"> • This would encourage people to travel by car & is not supported; • There should be no increase in general road capacity; • Should be restricted to cycling & public transport; • Would spoil the green corridor; • Contrary to the approach being advocated on the NIAB site; • Route needs to be of urban form if it is to function properly; • Will have an uncertain impact on the transport network in the NW quadrant 	Pursue Option 13.2
Option 13.2: New all purpose route linking Madingley Rd & Huntingdon Rd	<ul style="list-style-type: none"> • There should be no increase in general road capacity; • Will have an uncertain impact on the transport network in the NW quadrant 	Pursue Option 13.2
Option 13.3: New orbital link limited to cyclists & public transport	<ul style="list-style-type: none"> • Failure to provide road capacity does not encourage use of other modes of transport by those for whom it is impractical; • Slower speeds & safe crossings are required for pedestrians & cyclists; • Cycling should be given high priority with road crossings; • Draft Transport Strategy shows there is not high demand for orbital movements and new roads should be designed to serve the development while discouraging their use as an orbital route; • Draft Strategy also highlights the need for direct walking, cycling and public transport links; • Draft Transport Strategy concludes orbital link should cater for all modes of transport, although will need to mitigate the desire for rat-running; • Preferred option must be based on an assessment of the evidence & input from key stakeholders 	Pursue Option 13.2
Option 13.4: Orbital route limited to	<ul style="list-style-type: none"> • Failure to provide road capacity does not encourage use of other modes of transport by those for whom it is impractical; 	Pursue Option 13.2

OPTION	KEY ISSUES	PREFERRED APPROACH
cyclists & public transport designed with regard to slower speeds & safe crossings	<ul style="list-style-type: none"> • This denies the benefits to other drivers of reducing congestion in the City; • Draft Transport Strategy concludes orbital link should cater for all modes of transport, although will need to mitigate the desire for rat-running 	
Option 13.5: Provision of north facing slip roads	<ul style="list-style-type: none"> • This would further exacerbate traffic problems; • This is not a sustainable approach to development; • There has never been any technical evidence to support this scheme; • Draft Transport Strategy shows the potential benefits of this scheme are negligible when compared to provision of an orbital link; • The need for such a scheme has not been demonstrated; • There are no plans to provide such slip roads; • The Council has a duty to support the provision of sustainable transport as a priority over the production of new road schemes 	Pursue option 13.6
Option 13.6: No new slip roads	<ul style="list-style-type: none"> • This would not enhance travel links from the South Cambridge area and Cambourne in particular 	Pursue option 13.6
Option 13.7: Cycle links	<ul style="list-style-type: none"> • Should include reference to linking cycle routes to all road links to ensure sustainable development; • Policy should state where the links are to (should explicitly state to Cambridge and all other large developments) • All cycle routes should be designated cycle paths (not shared-use) and designed to the highest Sustrans/DfT standards; • Needs to include reference to provision of secure and convenient residential cycle parking 	Pursue option 13.7
Option 14.3: University site suitable for a secondary school	<ul style="list-style-type: none"> • It would be at the very fringe of its catchment area; • Would consume too much land; • Concern about the absence of a justification in planning terms for locating a secondary school within the North West quadrant; • Emerging preference for a site between Huntingdon Road & Histon Road; • Development does not generate the need for a new secondary school 	Pursue option 14.4
Option 14.4: University site not a suitable location for a secondary school	<ul style="list-style-type: none"> • Concern about the absence of a justification in planning terms for locating a secondary school within the North West quadrant; • Must be planned in conjunction with the NIAB site 	Pursue option 14.4

OPTION	KEY ISSUES	PREFERRED APPROACH
Option 14.5: No school playing fields to be located in the strategic gap	<ul style="list-style-type: none"> No justification for objection given 	Pursue neither option, however consider locating playing fields unrelated to the Secondary School in the strategic gap
Option 14.6: School playing fields in the Strategic Gap	<ul style="list-style-type: none"> Needs to be some flexibility in relation to other uses on the site; Would introduce urban elements inappropriate to the open space separating Cambridge and Girton; Would object unless they are also made available for significant public usage. If not it would denote an undesirable fragmentation of public green space 	Pursue neither option, however consider locating playing fields unrelated to the Secondary School in the strategic gap
Option 18.1: 10% renewable energy	<ul style="list-style-type: none"> The policy is too weak; The suggestion that housing developments could provide 10% or indeed 20% renewable energy is strongly questioned; Renewable energy issues should not stifle regeneration and development 	Pursue option 18.2 in combination with 18.3 & 18.4 subject to amendments
Option 18.2: 20% renewable energy	<ul style="list-style-type: none"> Current policies require 10% and it is considered unreasonable to require a much higher target for this development; Will local planning authorities support the provision of large wind turbines on the site; The suggestion that housing developments could provide 10% or indeed 20% renewable energy is strongly questioned; Renewable energy issues should not stifle regeneration and development 	Pursue option 18.2 in combination with 18.3 & 18.4
Option 18.3: Renewable Energy & CHP	<ul style="list-style-type: none"> The environmental advantages and financial viability of CHP are to a large extent dependant on the size and timing of demand & residential development might provide a reliable base load for CHP 	Pursue option 18.2 in combination with 18.3 & 18.4
Option 18.4: District Heating Scheme	<ul style="list-style-type: none"> The plan should not specify a policy requirement in advance of a feasibility study and testing; Make it clearer that the 20% renewable energy obligation applies with a district heating scheme if it is found that a combined heat and power scheme is not suitable 	Pursue option 18.2 in combination with 18.3 & 18.4
Option 20.1: Storm Water Drainage	<ul style="list-style-type: none"> Drainage plans should seek to actively decrease rainwater input to the Washpit; Should include a statement that SuDs should not affect the SSSI and wet areas; Does not consider the wider catchment area (catchment wide study needed); SuDS challenged as a suitable solution 	Pursue option 20.1 subject to amendments
Option 20.2: Maintenance	<ul style="list-style-type: none"> Too early to prescribe the means by which water bodies and watercourses will be managed 	Pursue option 20.2 subject to

OPTION	KEY ISSUES	PREFERRED APPROACH
of water bodies		amendments
Option 20.3: Councils to maintain water bodies	<ul style="list-style-type: none"> • Too early to prescribe the means by which water bodies and watercourses will be managed 	Pursue option 20.2 subject to amendments
Option 20.4: Anglian water to maintain water bodies	<ul style="list-style-type: none"> • Too early to prescribe the means by which water bodies and watercourses will be managed 	Pursue option 20.2 subject to amendments
Option 20.5: University to maintain water bodies	<ul style="list-style-type: none"> • Too early to prescribe the means by which water bodies and watercourses will be managed 	Pursue option 20.2 subject to amendments
Option 20.6: Water conservation	<ul style="list-style-type: none"> • Policy is not strong enough (mandatory grey water recycling & rainwater capture); • Include targets for reduction of water use; • Need to ensure no adverse effects on the water environment and biodiversity 	Pursue option 20.6 subject to amendments

Sustainability Appraisal

Interim Sustainability Appraisal Report

- 3.8 It is a requirement of the Planning and Compulsory Purchase Act (2004) for all planning policy documents to undergo a Sustainability Appraisal in order to determine their impact on social, economic and environmental objectives. The first stage in this process is to determine the scope of the Sustainability Appraisal and to set out the Sustainability Appraisal Framework, which will be used to assess the AAP.
- 3.9 Guidance produced by the Office of the Deputy Prime Minister in 2005 (Sustainability Appraisal of Regional Spatial Strategies and Local Development Documents) confirms that one Scoping Report can be prepared for several Local Development Documents provided that it gives sufficient information at the level of detail required for each of the documents concerned. An addendum can then be produced for each individual document, to introduce the purpose and objectives of the document in question and to identify any specific sustainability issues and objectives that should be taken into account in the Sustainability Appraisal.
- 3.10 Both Cambridge City Council and South Cambridgeshire District Council have produced separate Scoping Reports² for the SA of their Local Development Frameworks. For the purposes of the North West Cambridge Area Action Plan, it was decided to draw upon these and to identify specific

² Cambridge Local Development Framework SA Scoping Report March 2005, South Cambridgeshire District Council SA Scoping Report, January 2006

sustainability issues relating to North West Cambridge by way of a Scoping Report Addendum.

- 3.11 The Scoping Report Addendum was sent out for consultation between the 21st August to the 19th September 2006. Consultation was carried out with the four SEA Consultation Bodies (the Environment Agency, Natural England, The Countryside Agency and English Heritage) and other key stakeholders. This consultation enabled these bodies to comment on the appropriateness of the objectives, indicators, baseline assessment and issues/problems. No changes were considered necessary as a result of this consultation.
- 3.12 The next stage of the SA process was to appraise the options presented in the Issues and Options Report. The role of the SA is to help inform the decision maker when developing the draft Area Action Plan on what tradeoffs are likely to be required and what the associated environmental, social and economic impacts are likely to be. To this end, the Issue and Options Report was appraised and reported in the interim Sustainability Appraisal Report prepared by Scott Wilson (2006). This document was made available for consultation at the same time as the Issues and Options Report.
- 3.13 A total of 9 representations were received to the interim Sustainability Appraisal, and these were mainly concerned with the process by which the Area Action Plan was carried out and the assumptions made by the appraisal. As the SA was carried out by independent consultants in order to inform the preparation of the draft Area Action Plan, it was felt that no changes should be made to the SA as a result of this consultation.

4. DEVELOPMENT OF PREFERRED OPTIONS

- 4.1 Following on from the Issues and Options Consultation, the Councils prepared the North West Cambridge Area Action Plan Preferred Options Report, which took the form of a draft Area Action Plan (Volume 1) and a document recording the development of the preferred options and the reasons for rejecting alternative options (Volume 2). Volume 1 also contained a Pre-Submission Proposals Map and a Housing Trajectory.
- 4.2 In drawing up the Preferred Options Report account was taken of national, regional and local policy, Issues and Options representations, the Sustainability Appraisal, local circumstances and the available evidence base. Drafting of the Report was also informed by the binding Inspectors' Reports into the South Cambridgeshire Local Development Framework, which have emphasised the need for conciseness and in the case of the Northstowe Area Action Plan, clarified the level of policy detail appropriate for an Area Action Plan for a large development.

5. PREFERRED OPTIONS CONSULTATION (REGULATION 26)

- 5.1 The Preferred Options Report was subject to Pre-Submission public participation from the 22nd October to the 3rd December 2007, and representations were invited either in support or objection to the policies set out in Volume 1.
- 5.2 As mentioned in paragraph 3.1 above, the bodies identified for consultation at the Issues and Options stage, subsequently became 'DPD Bodies' and, in accordance with the regulations, were sent all the relevant consultation documents, as outlined in the letter contained in Appendix D. In addition the public were advised of the consultation by press releases and formal public notices in the press and invited to comment on the policies contained in the draft Area Action Plan. Copies of the Area Action Plan were also sent to a number of public libraries. A copy of the notice of consultation is provided in Appendix E. The consultation documents, including the statement of the 'proposals matters', were made available in the following locations:
- Online at the City Council's website (www.cambridge.gov.uk) and at South Cambridgeshire District Council's website (www.scambs.gov.uk);
 - At Cambridge City Council's Environment and Planning Reception and at South Cambridgeshire Hall, Cambourne during normal office hours; and
 - At libraries in Cambridge City.
- 5.3 In addition, a summary leaflet was delivered to 10,342 households in the part of the City between Huntingdon Road and Madingley Road and in the villages of Coton, Girton and Histon/Impington. This leaflet provided the details of three exhibitions, which were held to assist in engaging the public in the Area Action Plan process, as outlined in the table below. These were manned by Officers of Cambridge City Council, South Cambridgeshire District Council and the County Council and outlined the key sections of the Area Action Plan.

Table 4: Details of the Exhibitions for the Preferred Options Consultation

Date and Time	Venue
Tuesday 30 th October 2007, 2-8.30pm	Girton Pavilion, Cambridge Road, Girton
Thursday 8 th November 2007, 2-8.30pm	Ante Room, New Hall College, Huntingdon Road, Cambridge
Tuesday 13 th November 2007, 2-8.30pm	University Sports Pavilion, Wilberforce Road, Cambridge

- 5.4 An interactive website was set up in order to facilitate the submission of representations. A total of 590 representations were submitted and a breakdown of these is given in table 5 below. 80% of representations were submitted via the interactive website.

Table 5: Breakdown of representations received to the Preferred Options Report

130 Supports	460 Objections
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Summary of the main issues raised and how these were dealt with

5.5 Table 6 below sets out the main issues raised as part of the consultation on the Preferred Options Report and the Councils’ response to the issues raised.

Table 6: Key Issues Raised During Preferred Options Consultation

Issue	Councils’ Response
Site & Setting	
Objections from local residents that the Preferred Option is too limited and would result in over-development with higher densities which would adversely impact on residential amenity and the Ascension Parish Burial Ground - support therefore for the University’s site footprint set out in Option 10.1.	Policy NW2 sets out a number of overarching development principles that will guide development, with the aim that development takes account of its surroundings, including existing buildings, open spaces and existing urban and village edges to ensure that development does not harm local amenity and where possible brings benefits to the area. Matters of detail will be dealt with in the Masterplanning and planning application stages. No changes to the AAP.
Lower densities and building heights with more green open spaces needed on edges of the development where it abuts existing properties	This is dealt with in the overarching development principles (NW2) that will guide development. It will be for the Masterplanning and planning application stages to take this forward in designing the development to achieve appropriate landscaping on the edge of development and to safeguard the amenity of existing properties. Masterplanning will also consider how best to protect the character of the existing features of interest including the Ascension Parish Burial Ground. No changes to the AAP.
The site footprint is insufficient to meet the needs set out in other policies within the AAP or the future needs of the University, and would result in a poor and inefficient development configuration; the developable area identified is inadequate for 2,500 homes and student housing, research & development buildings and	The Councils’ have carried out a final ‘health check’ on the site boundary prior to submission, testing it against the plan’s objectives. This has led to modest amendments being made to the site footprint boundary in South Cambridgeshire, which increases the site footprint whilst retaining a green foreground setting to Cambridge provided by the slope of land rising from the Washpit Brook. This allows

neighbourhood facilities	for an increase in the developable area of 3.9 hectares, taking the total developable site area to approximately 73 hectares and the total housing capacity to 2,325 dwellings, which remains within the range sought by the University. Amend the site footprint of the Area Action Plan.
Support for the Strategic Gap but confusion over its purpose.	Amend the first sentence of paragraph 3.7 to provide clarification.
Housing	
Two storey houses should be provided adjacent to the site edges with 30 metre long gardens to provide wildlife sanctuaries and to respect local character and residential amenity.	Disagree that this should be the case as such an inflexible policy is not justified. Policy wording already states that development will be of an appropriate form and scale where it adjoins existing housing. The protection of amenity and character cannot only be achieved in the ways proposed and it is proper to allow future masterplanners and designers to have some flexibility in meeting this requirement. No change to the Area Action Plan.
Inclusion of words 'at least 50% affordable housing' is unsound and not supported by the evidence.	Agree that the Local Plan Inspector did agree that a 50% target for this site was appropriate having regard to the viability evidence. However the policy qualifies its reference to 50% affordable housing being provided by stating that account will be taken of costs and viability, it cannot therefore be termed inflexible. Amend the Area Action Plan by deleting the words 'at least'. Amend supporting text (para 4.6) to better reflect the Cambridge Local Plan Inspector's Report.
Concerns regarding affordable housing distribution in small groups or clusters and the proposal to locate student housing in a separate and distinct quarter as set out in Policy NW7.	Intermingling of affordable and market housing is standard planning practice and is supported by PPS3. Amend the Area Action Plan to clarify what is meant by small groups or clusters. With regards to student housing, agree that as over half the student housing would be for post-graduates who can have cars, the case for a separate student quarter is less convincing. Amend the Area Action Plan to reflect this.
Employment	
The split between academic uses and research is arbitrary, greater flexibility	In order to plan positively for the future of the area more detail is needed on the likely mix of

<p>should be allowed in order to take full advantage of opportunities when they arise.</p>	<p>uses. In the absence of more detailed evidence this split has had the advantage of going through the Inquiry Process for the Cambridge Local Plan and maintains predominantly University-related uses in the employment uses on the site.</p> <p>A change has been made to the split in light of a recalculation of figures</p>
<p>Transport</p>	
<p>The link road will primarily be for access to the site but it will also offer an alternative access to the strategic road network.</p>	<p>The prime function of the road is to provide access to the development, with the proviso that this does not have adverse traffic impacts or effects upon amenity. The location and design of the route will take into account the factors raised in this objection (proximity to the strategic gap, SSSI etc)</p> <p>No change to the Area Action Plan.</p>
<p>A road will only be possible if impacts on amenities including the green/strategic gap and the historic environment are acceptable.</p>	<p>Agree that this is a key issue, paragraph 6.6 makes it clear that a road will only be possible if impacts on amenity are acceptable. These impacts would include minimising the effects upon green spaces and the historic environment through design, route location and landscaping as part of the Masterplanning process.</p> <p>No change to the Area Action Plan.</p>
<p>The design of new roads should give priority to public transport, pedestrians and cyclists.</p>	<p>The design of the new road, together with other policies in the AAP should give priority to public transport, cyclists and pedestrians.</p> <p>No change to the Area Action Plan.</p>
<p>Madingley Rise could provide access to development to the east of the site and will help to distribute traffic evenly to the local road network (through the University Observatories site on Madingley Road).</p>	<p>The intention is to minimise the number of access points consistent with the form of development proposed, but this does not prevent access through the University Observatories if this is justified.</p> <p>Amend wording of paragraph 6.5 to clarify this.</p>
<p>Community Services and Facilities</p>	
<p>No reference to need for health care facilities.</p>	<p>Agree that there should be reference to healthcare provision in the AAP.</p> <p>Amend wording of paragraph 7.9.</p>
<p>1% contribution to public art should be a target, not a minimum requirement as this could have significant impact on viability.</p>	<p>Agree that this policy should be consistent with other planning policy guidance and seek a cost equal to 1% of the construction cost of the development.</p> <p>Amend Policy NW22 to reflect this.</p>

Natural Resources	
Levels are far from a high degree of sustainability. Code level 5 should be the absolute minimum for residential.	This would not be consistent with national policy, which states that such policies should have regard to viability of the development and the delivery of affordable housing. Code Level 4 represents a 44% improvement in energy/carbon performance than part L of Building Regulations. Of the 2,250 dwellings proposed, 1,700 will be brought forward at a minimum of Code Level 5. No change to the Area Action Plan.
An approach that delivers Code level 4 up to 2016 and Code level 6 beyond 2016 would provide a more realistic delivery path.	The Councils' approach is consistent with National and Regional Planning Policy. If CHP is found to be viable at this site this will result in considerable carbon emission reduction and assist in meeting the specified Code levels. No change to the Area Action Plan.
There is a need for greater clarity and certainty in the proposed approach, particularly clarification of the relationship between Policy Options NW24 and NW29.	Amend the Area Action Plan to combine policies NW24, NW25 and NW29 in order to ensure clarity.
Policies should reflect recent development in strategic management of water resources and the Catchment Wide Studies now being developed by the Environment Agency.	Level of detail required is too detailed for the Area Action Plan, which is intended to give a strategic overview to development. This level of detail will need to be included in the Flood Risk Assessment, which will be submitted with the outline planning application and will be subject to consultation with the Environment Agency. No change to the Area Action Plan.
Recent survey work on the 350m culvert carrying the Award Drain beneath the B1049 in Histon and Impington has amplified grave concerns over flood risk and structural soundness.	Level of detail required is too detailed for the Area Action Plan, which is intended to give a strategic overview to development. This level of detail will need to be included in the Flood Risk Assessment, which will be submitted with the outline planning application and will be subject to consultation with the Environment Agency. No change to the Area Action Plan.
Delivery	
Construction waste must not be placed in mounds or beams near the boundary where it will diminish the amenity of neighbouring houses or in such a way as to create surface water or sub surface runoff from the site.	Amend part b of Policy NW30 to provide more clarity with regards to local urban character and landscape character.

<p>The University has already demonstrated its needs case for residential housing provision and student housing.</p>	<p>In accordance with Structure Plan policy P9/2c, land should be released from the Green Belt for predominantly University related uses and only brought forward when the University show a clear need for land to be released. Housing is not the only element of the site and due to the site's close proximity to the West Cambridge site, it is important that as development comes forward, the University can satisfactorily demonstrate the need for the development and that it cannot reasonably be met elsewhere. A needs statement will be required.</p> <p>No change to the Area Action Plan.</p>
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Sustainability Appraisal

- 5.6 The Preferred Options report was subject to Sustainability Appraisal, which tested both the Objectives of the draft Area Action Plan and the policies themselves in order to assess them in terms of their accordance with sustainability principles. The Sustainability Appraisal consultants, Scott Wilson, carried out an initial appraisal of the draft Area Action Plan prior to it being made available for public consultation, in order to allow the Councils the opportunity to amend the draft plan where considered appropriate. Further details of this are outlined in table 7 below and were also included in the audit trail provided by Volume 2 of the Preferred Options Report.

Table 7: Sustainability Appraisal Recommendations and Councils' Response

Preferred Policy Option Reference Number	Sustainability Appraisal Recommendations	Councils' Response	Policy amended?
NW2	The main area for change is in strengthening some of the principles already in place, and adding slight amendments to other Development Principles:		
	Long-term protection of the Green Belt should be included	Disagree. This is covered by national planning guidance.	No
	The biodiversity of the site needs to be appraised as soon as possible.	Noted	No

	Principle 3 or 4 should be amended to include light and light pollution	Already covered by NW2 part 3 (k, l and n) and paragraph 2.8 although NW2 part 4 has been strengthened to include a specific reference to lighting.	Yes
	Principle 2 (j) should be amended to "Provide integrated refuse and recycling facilities <i>and reduce the amount of waste produced through good design.</i> "	Agree.	Yes
	Principle 2 (f) should be amended to say "Enhance and protect the biodiversity..."	Agree in principle.	Yes although recommended wording not used.
	Principle 3 (n) should be amended to say "On biodiversity, protected species, archaeological..."	Disagree. Planning permission will not be granted where the proposed development or associated mitigation measures would have an unacceptable adverse impact on biodiversity etc. Biodiversity is an all-embracing term therefore any adverse impact on protected species would be considered as the policy stands.	No
NW4	Policy should be reworded to read: "to ensure separation is maintained between Cambridge and Girton village and to provide a central open space for biodiversity, landscape, recreation and amenity, whilst ensuring a cohesive and sustainable form of development.	Agree in principle.	Yes although recommended wording not used.
NW7	Background paragraph 4.9 should be amended to clarify the University's position on 'car free', and in particular their policy for this site.	Disagree as this is adequately covered in paragraph 6.21.	No
NW9	Local employees accessing their place of work by sustainable means of transport is of strategic importance.	Noted.	No
NW11	The Policy as it stands sets a high level of modal split. This should,	This is to allow for consistency with the	No

	dependant on implementation be set at a higher level and this should be considered this is with particular reference to the 37% modal split highlighted in the supporting text.	Cambridge East Area Action Plan and allow for any over estimate of the potential modal split.	
NW12	Car free should apply to the market housing and University buildings in addition to the 'essentially car free' University accommodation. This is recommended as the most sustainable option.	Noted. The policy advocates reducing the need to travel as much as possible but in this out of centre location it cannot be 100% car free.	No
	Traffic assessments may be necessary as part of the development proposal must include consideration of whether the scheme could induce new traffic movements.	Noted. The transport assessment would take this into consideration and therefore it does not need to be covered in the policy.	No
NW13	It will be at the detail level that it will be possible to gauge the true level and type of impact on landscape character, and furthermore to ascertain the impacts of light, noise and air pollution. Therefore any application should consider Landscape Impacts as part of its scope	Noted. Policy NW2 covers such general principles.	No
NW19	The policy should be expanded to promote car free development for all of the land uses designated on the site. This is recommended as the most sustainable option.	Noted. Policy NW11 advocates reducing the need to travel as much as possible but in this out of centre location it cannot be 100% car free.	No
NW20	Part 1 of the policy has no mention of ensuring high quality services and facilities. Suggest rewording thus: "The development will provide an appropriate high quality level and type of services and facilities in suitable locations ..."	Agree in principle.	Yes although recommended wording not used.

NW21	Part 2 of the Policy should be reworded to make clearer what it is hoping to achieve. Suggest the addition of an e.g.: “Where appropriate, those services and facilities delivered by the community or voluntary sector (e.g. faith facilities) will be provided through...”	Agree in principle.	Yes although recommended wording not used.
	There were no negative impacts identified by the assessment. One recommendation is that, although the Policy promotes public transport access, it will be important to ensure that this enables access to the centre for all elements of the community. This should be mitigated through NW2 (1 (b)).	Noted.	No
NW22	Most detailed mitigation for this policy should be implemented through the Masterplan. Recommend that the policy or policy background include integration of public engagement requirements.	Agree.	Yes – supporting text amended.
NW23	The supporting text paragraph 8.1 should be amended to, “many open space uses are not mutually exclusive”.	Agree.	Yes
NW24	The policy background text should be amended to promote a strategic approach to locating all open and green space encouraging the use of pedestrian and cycle routes	Noted.	No
	The policy should be rephrased to ensure the highest possible standards are aspired to, unless it can be proven that they are not reasonable for technological, economical or environmental reasons.	Agree.	Yes
NW25	There should be a clearer distinction between the CSH and BREEAM standards. CSH applies to residential development, taking over from EcoHomes whereas BREEAM will apply to all other developments. This split needs to be distinct and clear.	Agree.	Yes

	<p>To avoid confusion between climate change mitigation (reduction in CO₂) and adaptation (flood defences) the last sentence of paragraph 9.1. should be amended to read:</p> <p><i>“North West Cambridge will need to play its part in helping to reach this goal, balancing the overall increased emissions due to the scale of the development, with the opportunities that new development offers for reducing carbon emissions, through such measures as sustainable design and the provision of decentralised and renewable energy sources.”</i></p>	Agree.	Yes
	<p>The supporting text makes an important link between adapting to future increased temperatures, but at the same time reducing emissions, therefore also acting to mitigate climate change. However, it is thought that ‘air conditioning’ or ‘active cooling systems’ could be substituted for ‘active heating and cooling systems’, in order to add to clarity.</p>	Disagree as the supporting text refers only to climate change and both heating and cooling systems contribute to this.	No
	<p>This Policy refers to sustainable design, but could also be used to promote sustainable construction. Amend Part B to read</p> <p><i>“...sustainable design and construction in line with...”</i></p>	Agree.	Yes
	<p>The compatibility with the requirements for levels of the CSH needs to be checked. Also, as with the previous Policy, a clear distinction between residential and other uses, and their respective requirements needs to be made.</p>	Disagree as this sets a minimum standard for the development as a whole.	No

NW26	Part 1 of the Policy recognises that some developments will not be able to feasibly meet the 20% on-site renewables requirement. In order to ensure that all development results in carbon reduction benefits it is suggested that Part 1 of the Policy be extended to state that: Where a development can demonstrate that generating on-site renewables is not viable, then there is a requirement to demonstrate how a similar reduction in carbon emissions will be achieved through energy conservation (in addition to energy conservation required through any other Policy).	Disagree as energy conservation is already required under Policy NW24 and will still be a requirement if Policy NW25 cannot be met.	No
	There needs to be a clearer hierarchy in Part 2 of the Policy, as CHP can be fuelled by biofuels, just as a DHS. A possible hierarchy could be: <ul style="list-style-type: none"> 1. CHP fuelled by biomass 2. CHP fuelled by gas 3. District heating fuelled by biomass District heating fuelled by gas	Agree in principle.	Yes although recommended wording not used and added to the supporting text rather than policy.
	It is also recommended that priority be made for energy demand reduction first, then renewable technology second, as reduction of energy demand is higher up the energy hierarchy and will result in lower overall GHG emissions.	Disagree as both go hand in hand.	No
	Part 2 of the Policy should be reworded to increase clarity. It could be stated that: “The SuDS will seek to hold water on the site, ensuring that it is released to surrounding water courses at an equal, or slower, rate than is the case prior to development.”	Agree.	Yes

NW27	In order to increase clarity, Part 4 of the Policy could be reworded to state that: "Any surface water drainage scheme will need to be capable of reducing the down stream flood risk associated with storm events as well as normal rainfall events under future climate change scenarios."	Agree in principle.	Yes although recommended wording not used.
	It could be beneficial to refer to integrated approaches to the treatment of wastewater that include grey water recycling as part of sustainable design and construction (promoted by Policy NW24).	Noted. This Policy already forms parts of an integrated water strategy for North West Cambridge.	No
NW28	Part 2 of the Policy could be reworded to add to clarity. This could read: "No development shall commence until the written agreement of the local planning authorities has been secured stating that organisations with sufficient powers, funding, resources, expertise and integrated management are legally committed to maintain and manage all surface water systems on the North West Cambridge site in perpetuity.	Agree.	Yes
	Reference should be made to the type of monitoring, such as ecological/biological/hydrological conditions into the future to ensure that good conditions are being maintained.	Disagree as this will form part of the written agreement.	No
NW29	This Policy should be internally coherent with Policy NW24 and the Code for Sustainable Homes in terms of standards and timescale.	This is already the case as the percentages are based on the Code for Sustainable Homes (as compared to the 2005/06 industry standard)	No

NW30	The supporting text refers to water conservation measures reducing 'the overall demand for water'. This is not strictly true as the development will in fact increase overall demand for water in what is already a water stressed region. The Policy should aim to reduce per capita demand for water.	Agree	Yes
	Paragraph 2 of the supporting text refers to 'improving the efficiency of water supply'. This should be changed to 'water use'.	Agree	Yes
	The final sentence of paragraph 9.18 should read 'adverse affect on biodiversity, or the wider water environment, in accordance with the Water Framework Directive'.	Agree	Yes
	The Policy should include a requirement for all construction traffic to use the most effect and sustainable access to the site.	This is covered in the supporting text to the Policy – paragraph 10.5.	No
NW31	The Policy should make explicit the requirement to link providing high quality habitat (including the planting of trees of local genetic stock) that is strategically located in order to reduce habitat fragmentation with improving the quality of open space and green space.	Noted.	No
NW32	Reference should be made to the strategic aim of phasing and to the nature of receptors exposed to impacts during the construction of the development (i.e. current and future residents).	This is covered by the Policy NW30 and the supporting text – paragraph 10.4.	No
NW33	To ensure the comprehensiveness of the list of types of infrastructure for which contributions will be sought 'energy infrastructure' could be added to the list in paragraph 10.13	Agree.	Yes

5.7 Consultation on the Sustainability Appraisal was carried out for six-weeks at the same time as consultation on the Preferred Options Report. A total of 26 representations were received to the Sustainability Appraisal, 2 in Support and 24 in Objection. The majority of these objections were in relation to the key issues identified and the findings of the Sustainability Appraisal. As the Sustainability Appraisal was carried out by independent consultants in order to inform the preparation of the draft Area Action Plan,

it was felt that no changes should be made to the SA as a result of this consultation.

Appropriate Assessment

- 5.8 In accordance with Article 6(3) of the European Directive 92/43/EEC on the Conservation of Natural Habitats and Wild Fauna and Flora, a Habitats Regulations Assessment is required for all local development documents in order to assess the potential effects of a proposed plan or project both alone and in combination with other plans and projects, on one or more Natura 2000 or Ramsar sites. There are four stages to this process: Screening, Appropriate Assessment, Assessment of Alternative Solutions and Compensatory Measures. If the screening stage concludes that are likely to be no significant impacts on European sites then there is no requirement to proceed to the stage of Appropriate Assessment.
- 5.9 In order to meet the requirements of Article 6(3), the North West Cambridge Area Action Plan Preferred Options Report was subject to a Screening Assessment. Consultation was carried out with Natural England, who are the statutory nature conservation body for Appropriate Assessment. Natural England supported the Screening Assessment's conclusion that policies in the North West Cambridge Area Action Plan Preferred Options Report were unlikely to have significant impacts upon the European Sites located within and in the vicinity of South Cambridgeshire District and Cambridge City, and that an Appropriate Assessment is therefore not required for this document. A copy of the letter from Natural England is included in Appendix F.
- 5.10 The Screening Assessment was made available as a supporting document during the Preferred Options consultation.

6. SUBMISSION DRAFT AREA ACTION PLAN (REGULATION 28)

- 6.1 Following on from the Preferred Options Consultation, the Councils have now prepared the Submission Draft Area Action Plan, with the intention to submit this to the Secretary of State for Examination. In preparing the Submission Draft Area Action Plan the Councils have carried out a health check of the site footprint, bearing in mind the representations received to the Preferred Options Consultation, and this has led to amendments being made to the site footprint. A number of other changes have been made to the Area Action Plan in order to provide clarity as shown in Table 6. The audit trail provided as Volume 2 of the Preferred Options Report has been brought up to date and can be found in Appendix G.
- 6.2 The Submission Draft Area Action Plan will now be made available for a six-week period of public consultation from the 19th May until the 30th June 2008. The Submission Draft Area Action Plan identifies land to be released from the Green Belt in order to contribute towards meeting the needs of the

University of Cambridge. It also identifies land to be returned to the Cambridge Green Belt to the North of Madingley Road and land to provide green separation between Cambridge and Girton. It establishes an overall vision and objectives to achieve this and sets out policies and proposals to guide the development as a whole, along with a Proposals Map and the Housing Trajectory.

Sustainability Appraisal

- 6.3 The Submission Draft Area Action Plan has been subject to a Sustainability Appraisal. This appraisal assessed the changes being made to the Area Action Plan as a result of the Preferred Options Consultation in order to assess the significance of the change. Any changes that were considered 'major' were compared against the findings of the Sustainability Appraisal of the Preferred Options Report to determine whether or not there was any change to the outcomes of the appraisal, including the cumulative impacts of the plan. Three of the proposed changes were considered to be major and to affect the outcome of the plan, two relating to Policy NW7 (Balanced and Sustainable Communities) and one relating to Policy NW22 (Public Art). Changes to Policy NW7 were found to have positive impacts on the Sustainability Objectives allowing for greater social integration. The change to Policy NW22 was felt to have a negative impact on the level of investment in key community services and infrastructure, although the appraisal did acknowledge that the proposed change was consistent with other planning policy guidance. The findings of the appraisal have not led to any changes being made to the Submission Draft Area Action Plan.
- 6.4 The Sustainability Appraisal also considered two alternative site footprints that were put forward during the Preferred Options Consultation. In order to ensure that the footprints were adequately and fairly considered, they were assessed in the same way as all other site footprint options. The Councils carried out a final "health check" on the site footprint boundary before submission, testing it against the AAP objectives. This proposed relatively modest amendments to the site footprint boundary in South Cambridgeshire, which increases the site area but retains a green foreground setting to Cambridge provided by the slope of land rising from the Washpit Brook. This has also been subject to Sustainability Appraisal.
- 6.5 In accordance with the Regulations the Sustainability Appraisal will be made available for consultation at the same time as the Submission Draft Area Action Plan.

Appropriate Assessment

- 6.6 As mentioned in paragraphs 5.8 – 5.10 above, the Preferred Options Report has been subject to an Appropriate Assessment Scoping Report, the conclusion of which was that the Area Action Plan was unlikely to have

significant impacts upon the European Sites located within and in the vicinity of South Cambridgeshire District and Cambridge City, and that an Appropriate Assessment would therefore not be required. It is not felt that the changes that have been made in the preparation of the Submission Draft Area Action Plan are sufficient enough to have an impact on the findings of the original Appropriate Assessment.

Appendix A: Tests of Soundness Self Assessment Checklist

Test of Soundness	Section of the Statement in which dealt with
Procedural Tests	
i. In accordance with Local Development Scheme	Part I, Paragraph 2.5
ii. Compliance with the Statement of Community Involvement	Part I, Paragraph 2.6 – 2.7
iii. Subject to Sustainability Appraisal	Part I, Paragraphs 2.8 – 2.9
Conformity Tests	
iv. Conformity with national planning policy and the Regional Spatial Strategy	Part I, Paragraphs 2.10 – 2.12
v. Regard to the Community Strategies	Part I, Paragraph 2.13
Coherence, consistency and effectiveness	
vi. Policies are coherent and consistent	Part I, Paragraphs 2.14 – 2.17
vii. Policies are most appropriate in all circumstances, are founded on a robust and credible evidence base and relevant alternatives were considered	Part I, Paragraphs 2.18 – 2.19
viii. Clear mechanisms for implementation and monitoring	Part I, Paragraphs 2.20 – 2.21
ix. Plan is flexible to deal with changing circumstances	Part I, Paragraphs 2.22 – 2.23

Appendix B: Consultees for North West Cambridge (DPD Bodies)

Category	Organisation
Statutory Consultees	146 x Parish Councils GO-East Highways Agency South Cambridgeshire District Council Cambridgeshire County Council East of England Regional Assembly English Nature (Natural England) The Countryside Agency (Natural England) English Heritage Network Rail Environment Agency East of England Development Agency NTL Mobile Operators Association The Norfolk, Suffolk and Cambridgeshire Strategic Health Authority National Grid Transco Plc National Grid Npower Renewables EDF Energy Anglian Water Services Cambridge Water Company Cambridgeshire Horizons BT Openreach Newsite Uttlesford District Council Forest Heath District Council East Cambridgeshire District Council Essex County Council Hertfordshire County Council Huntingdonshire District Council St Edmundsbury Borough Council Suffolk County Council Peterborough City Council
Transport	Stagecoach in Cambridgeshire
Residents Associations	Bulstrode Gardens Residents Association Castle Community Action Group Clerk Maxwell Road Residents Association CRONC Gough Way Residents Association Huntingdon Road Residents Association LAMP (Leaseholders Association of Manor Place & Malcolm Place) Millington Road Residents Association NAFRA 19 Acre Field Residents Association New Pinehurst Residents Association North Newnham Residents Association

Old Pinehurst Residents Association
 Tavistock Road & Stratfield Close Residents Association
 Windsor Road Residents Association (WIRE)
 Girton Planning Action Group

Local Strategic Partnership	Cambridge Local Strategic Partnership South Cambridgeshire Local Strategic Partnership
Business	Cambridgeshire Chamber of Commerce Cambridge Chamber of Commerce Business Link for Cambridgeshire The Home Builders Federation Confederation of British Industry - East of England Institute of Directors - Cambridgeshire Branch
Councillors	City Councillors (x 42) South Cambridgeshire Councillors (x 57) County Councillors (for the City (x14) and South Cambridgeshire (x16)) MPs (Lansley/Paice/Howarth)
Sports/Recreation/Tourism	Sport England East Arts Council England East Sports Development Officer - Cambridge City Council Sports Development Officer - South Cambs DC The Ramblers Association
Environment/Conservation Groups	Renewables East The RSPB Eastern England Regional Office The Wildlife Trust The British Wind Energy Association* Cambridge Friends of the Earth Cambridgeshire Local Access Forum* Cambridge Preservation Society Campaign to Protect Rural England (CPRE) West Cambridge Preservation Society
Land Owners/Developers	University of Cambridge Estates Management and Building Service NIAB (c/o Bidwells)
Additional Consultees	Royal Mail
Housing	The Housing Corporation - Eastern Region

Health Organisations	Cambridge City Primary Care Trust South Cambridgeshire Primary Care Trust Cambridge University Hospitals NHS Foundation Trust
Education	The Vice Chancellor's Office, University of Cambridge Mayfield Primary School (Head Teacher and 18 x Governors (via the Clerk of the Governors) The Bursars' Committee
Faith Groups	Jehovah's Witnesses in Bedfordshire/Cambridgeshire* Cambridge Inter-Faith Group The Church of England Ely Diocese East of England Faiths Council
Diversity (Race, Gender, Age, Disability)	Age Concern Cambridgeshire The East Anglian Gypsy Council Cambridge Ethnic Community Forum Minority Ethnic Network of the Eastern Region (MENTER) Cambridgeshire Race Equality & Diversity Service Access Officer, Cambridge City Council Cambridge Council for Voluntary Services
Community Services	Cambridgeshire Constabulary Cambridgeshire Fire and Rescue Services The East Anglian Ambulance Service
Voluntary Organisations	Transport 2000 Cambridgeshire & West Suffolk Cambridge Cycling Campaign British Horse Society The Bridleways Group

Appendix C: Formal Notice of Issues and Options Consultation (as published in the Cambridge Evening News on the 18th September 2006)



Cambridge City Council
South Cambridgeshire District Council

Local Development Framework

North West Cambridge Area Action Plan Issues & Options Report

Notice of Arrangements for Public Consultation on the Issues & Options Report
(Regulation 25 of the Town and Country Planning (Local Development) (England) Regulations 2004)

Now is your opportunity to take part in deciding what planning policies should guide development in this area.

Cambridge City Council and South Cambridgeshire District Council have jointly produced the North West Cambridge Area Action Plan Issues & Options Report. This document sets out the various options available to guide development on land in Cambridge City and South Cambridgeshire between Madingley Road and Huntingdon Road.

The six-week consultation period for the Issues & Options Report is **Monday 25th September to Monday 6th November 2006.**

The Issues & Options Report is available for inspection at the following locations:

- Online at the City Council's website (www.cambridge.gov.uk) and at South Cambridgeshire District Council's website (www.scambs.gov.uk);
- At Environment and Planning Reception in The Guildhall Cambridge during normal office hours (9.00am – 5.00pm Monday to Thursday, 9.00am – 4.30pm Friday)
- At South Cambridgeshire Hall, Cambourne during normal office hours (8.30am – 5.00pm Monday to Friday)
- At the Central Library, Lion Yard, Cambridge during normal opening hours (9.00am – 7.00pm Monday to Friday, 9.00am – 5.30pm Saturday)
- At the following Libraries and Access Points in South Cambridgeshire during normal opening hours: Bar Hill, Bottisham, Cambourne, Cambridgeshire County Council, Cherry Hinton, Comberton, Cottenham, Fulbourn,

Gamlingay, Great Shelford, Histon, Huntingdon, Linton, Papworth Everard, Sawston, Swavesey, Waterbeach, Willingham,

You can also view exhibitions and speak to representatives of the Councils as follows:

- Friday 6th October, 2–8.30pm, The Pavilion, Girton Recreation Ground, Girton;
- Tuesday 10th October, 2-8.30pm, The Pavilion, University Sports Ground, Wilberforce Road, Cambridge; and
- Monday 23rd October, 2-8.30pm, The Auditorium, Fitzwilliam College, Storey's Way, Cambridge.

The Issues & Options Report can also be purchased at a cost of £10 (not including postage and packing). Please contact either the Environment and Planning Reception for Cambridge City Council at The Guildhall, Cambridge (Tel: 01223 457200) or South Cambridgeshire District Council, South Cambridgeshire Hall, Cambourne (Tel: 01954 713183).

Comments should be made using:

- The Online Response Form, which is available on the City Council's website and South Cambridgeshire's website (as above); or
- The Printed Response Form available at the City Council's Environment and Planning Reception (as above) or South Cambridgeshire District Council (as above)

Please submit your comments by **5.00pm on Monday 6th November 2006**.

Completed Printed Response Forms should be sent to:

- Simon Payne, Director of Environment and Planning, Cambridge City Council, The Guildhall, Cambridge, CB2 3QJ; or
- Steve Hampson, Executive Director, South Cambridgeshire District Council, South Cambridgeshire Hall, Cambourne Business Park, Cambourne, Cambridge, CB3 6EA

Any representations submitted in relation to the Issues & Options Report may also be accompanied by a request to be notified of future stages in the production of the Area Action Plan, including its submission to the Secretary of State for independent examination and subsequent adoption. If you wish to be notified, please inform us of the address at which you would like the notification to be sent, if different to that on the Response Form, by writing to the Planning Policy Team, Cambridge City Council at the address below or email policysurveys@cambridge.gov.uk or ldf@scambs.gov.uk.

For further information, please contact the Planning Policy team at Cambridge City Council as follows:

Tel: 01223 457200
Fax: 01223 457109

Email: policysurveys@cambridge.gov.uk

Alternatively you can contact the Planning Policy Team at South Cambridgeshire District Council as follows:

Tel: 01954 713183

Fax: 01954 713152

Email: ldf@scambs.gov.uk

Simon Payne
Director of Environment and Planning
Cambridge City Council
The Guildhall
Cambridge
CB2 3QJ

Steve Hampson
Executive Director
South Cambridgeshire District Council
South Cambridgeshire Hall
Cambourne Business Park
Cambourne,
Cambridge, CB3 6EA



To: North West Cambridge Consultees

16th September 2007

Our Ref: ASDB110

Dear Consultees,

Consultation on the North West Cambridge Area Action Plan Preferred Options

Cambridge City Council and South Cambridgeshire District Council have been working together to produce an Area Action Plan to guide development on land in Cambridge City and South Cambridgeshire between Madingley Road and Huntingdon Road. Between September and October 2006 we asked for comment on the issues and options for the site. These have now been considered and have helped the Councils prepare a draft Area Action Plan (technically this is called a Preferred Options Report).

The Preferred Options Report is comprised of two volumes. Volume 1 is a draft Area Action Plan and contains the vision, objectives, development principles and policies to guide development. Volume 2 sets out the background to each policy included in the draft Area Action Plan and explains why it was chosen. The draft Area Action Plan is now subject to public consultation for a six-week period from:

Monday 22nd October and Monday 3rd December 2007

During this time formal representations can be submitted to the draft Plan and these will, where appropriate, help inform the preparation of the Submission draft North West Cambridge Area Action Plan, which will be submitted to the Secretary of State for Public Examination in June 2008.

The new plan making system requires a Sustainability Appraisal to be carried out on the Area Action Plan and this appraisal to be made available for public comment at the same time as the draft Area Action Plan. This is done as to ensure

that the preferred options for the Area Action Plan can be considered against social, environmental and economic impacts. As such, the following documentation has been prepared for consultation:

- Sustainability Appraisal of the North West Cambridge Area Action Plan Preferred Options Report

The following background documents, which can be found on the CD included with this letter, have also helped to inform the preparation of the Preferred Options draft document:

- Site Footprint Assessment;
- North West Cambridge Transport Study;
- Junction Access Study onto Huntingdon Road;
- North West Cambridge Area Action Plan Green Belt Landscape Study
- Habitats Directive Assessment

Also included with this letter is the draft Area Action Plan (Volumes 1 and 2), the formal notice of consultation, and the Non-Technical Summary of the Sustainability Appraisal. The formal notice of consultation provides information about where the draft Area Action Plan can be inspected and how to submit representations.

Please send us any representations using the Online Response Form on the Councils' websites (www.cambridge.gov.uk or www.scamb.gov.uk/ldf). This is the Councils' preferred method for receiving representations. However, if you are unable to use the interactive service, printed Response Forms are available from the Councils using the contact details at the end of this letter. There is a Guidance Note to help you fill in the form.

All completed Response Forms need to be received by the Councils by:

5:00 pm on Monday 3rd December 2007.

Representations received after this date cannot be accepted. Please do not rely on sending an email or fax on the last day of the consultation period as we are unable to guarantee the availability of this service.

If you require further assistance please do not hesitate to contact either the Planning Policy team at Cambridge City Council on (Tel: 01223 457200) or the Planning Policy Team at South Cambridgeshire District Council on (Tel: 01954 713183).

Yours sincerely



David Roberts
Planning Policy Manager

Enclosures (4):

North West Cambridge Area Action Plan Preferred Options Report
Formal Notice of Consultation
Sustainability Appraisal Non Technical Summary
CD

Appendix E: Formal Notice of Preferred Options Consultation (as published in the Cambridge Evening News on the 19th October 2007)



Cambridge City Council
South Cambridgeshire District Council
Local Development Framework



North West Cambridge Area Action Plan Preferred Options Report
Planning and Compulsory Purchase Act 2004
(Regulation 26 of the Town and Country Planning (Local Development) (England) Regulations 2004)

Notice of Arrangements for Pre-Submission Public Participation on the North West Cambridge Draft Area Action Plan Preferred Options Report

Cambridge City Council and South Cambridgeshire District Council have been working together to produce an Area Action Plan to guide development on land in Cambridge City and South Cambridgeshire between Maddingley Road and Huntingdon Road. Following on from initial consultation between September and November 2006, a Preferred Options Report has now been produced, which sets out the vision, objectives, development principles and policies to guide development.

The six-week consultation period for the Preferred Options Report is **Monday 22nd October to Monday the 3rd December 2007.**

The Preferred Options Report, its associated Sustainability Appraisal and relevant supporting documents (North West Transport Study, Green Belt Landscape Study, Site Footprint Assessment and the Junction Access Study) are available for inspection at the following locations:

- Online at the City Council's website (www.cambridge.gov.uk) and at South Cambridgeshire District Council's website (www.scambs.gov.uk/ldf);
- At Environment and Planning Reception in The Guildhall, Cambridge during normal office hours (9.00am – 5.00pm Monday to Thursday, 9.00am – 4.30pm Friday)
- At South Cambridgeshire Hall, Cambourne during normal office hours (8.30am – 5.00pm Monday to Friday)
- At libraries in Cambridge City.

You can also view exhibitions and speak to representatives of the Councils as follows:

- Tuesday 30th October, 2–8.30pm, The Pavilion, Girton Recreation Ground, Girton;
- Thursday 8th November, 2-8.30pm, Ante-Room, New Hall College, Huntingdon Road, Cambridge;
- Tuesday 13th November, 2-8.30-pm, University Sports Pavilion, Wilberforce Road, Cambridge.

The Preferred Options Report can also be purchased at a cost of £15 (not including postage and packing), while the accompanying Sustainability Appraisal can be purchased at a cost of £10 (not including postage and packing). Please contact either the Environment and Planning Reception for Cambridge City Council at The Guildhall, Cambridge (Tel: 01223 457200) or South Cambridgeshire District Council, South Cambridgeshire Hall, Cambourne (Tel: 01954 713183).

Comments should be made using:

- The Online Response Form, which is available on the City Council’s website and South Cambridgeshire’s website (as above); or
- The printed Response Form available at the City Council’s Environment and Planning Reception (as above) or South Cambridgeshire District Council (as above)

Please submit your comments by **5.00pm on Monday 3rd December 2007**.

Completed printed Response Forms should be sent to:

- Simon Payne, Director of Environment and Planning, Cambridge City Council, The Guildhall, Cambridge, CB2 3QJ; or
- Gareth Jones, Corporate Manager (Planning & Sustainable Communities), South Cambridgeshire District Council, South Cambridgeshire Hall, Cambourne Business Park, Cambourne, Cambridge, CB23 6EA

Any representations submitted in relation to the Preferred Options Report may also be accompanied by a request to be notified of future stages in the production of the Area Action Plan, including its submission to the Secretary of State for independent examination and subsequent adoption. If you wish to be notified, please inform us of the address at which you would like the notification to be sent, if different to that on the Response Form, by writing to the Planning Policy Team, Cambridge City Council at the address below or email policysurveys@cambridge.gov.uk or ldf@scambs.gov.uk.

For further information, please contact the Planning Policy Team at Cambridge City Council as follows:

Tel: 01223 457200

Fax: 01223 457109

Email: policysurveys@cambridge.gov.uk

Alternatively you can contact the Planning Policy Team at South Cambridgeshire District Council as follows:

Tel: 01954 713183
Fax: 01954 713152
Email: ldf@scambs.gov.uk

Simon Payne
Director of Environment and Planning
Cambridge City Council
The Guildhall
Cambridge
CB2 3QJ

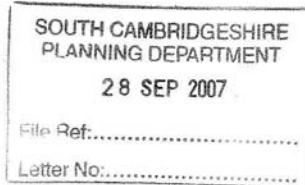
Gareth Jones
Corporate Manager (Planning &
Sustainable Communities)
South Cambridgeshire District Council
South Cambridgeshire Hall
Cambourne Business Park
Cambourne,
Cambridge, CB23 6EA

Appendix F: Letter from Natural England Re: Appropriate Assessment

Our ref: LA.SDC.06

26 September 2007

Alison Talkington
Senior Planning Policy Officer
South Cambridgeshire District Council
South Cambridgeshire Hall
Cambourne Business Park
CAMBOURNE
Cambridge CB3 6EA



Four Counties Team
Beds Cambs Essex & Herts
Ham Lane House Ham Lane
Orton Waterville
Peterborough PE2 5UR

T 01733 405850
F 01733 405860

Dear Alison

**South Cambridgeshire LDF Habitat Regulations Assessment – North
West Cambridge Area Action Plan – Preferred Options Draft**

Thank you for your consultation dated 5 September 2007 on the above Habitats Regulations Assessment, which includes the two documents comprising the (i) Habitats Directive Assessment, and (ii) Appendix 4 – Habitats Directive Assessment Screening Matrix.

We have just a few corrections/amendments to be added to the Habitats Directive Screening Matrix which are as follows:

Page 9:

Reasons for designation as SAC

(CG3 *Bromopsis erecta* and CG5 *Bromopsis erecta* – *Brachypodium pinnatum*....

Page 16:

Impact on protected species outside the protected sites

The conservation objectives relate to plant species and communities, invertebrates, great crested newts and spined loach. The development of land....

Page 23:

Impact on protected species outside the protected sites

The conservation objectives relate to plant species and communities, invertebrates, great crested newts and spined loach. Due to the distance of the site from the new urban quarter there is likely to be no significant effect, along or in combination... land....

Why these effects are not considered significant

..it is not considered that there is likely to be a significant impact on the conservation objectives....

Page 29:

Impact on protected species outside the protected sites

The conservation objectives relate to plant species and communities, great crested newts and spined loach. Due to the distance of the site from the proposed new urban extension to Cambridge there is likely to be no significant effect.

Page 43:

Reason for designation as SAC

(MG4 *Alopecurus pratensis*-*Sanguisorba officinalis*)

Page 44:

Impacts on protected species outside the protected sites

..Due to the distance of the site from North West Cambridge there is considered to be no effect. The development of land...

In addition, for general information regarding impacts on water quality and quantity (summarised in the Screening Matrix), it is possible that some existing abstraction licences could be causing affects on sensitive wetland SSSIs. This matter is being addressed through the Asset Management Planning Process (AMP) and Restoring Sustainable Abstraction (RSA) initiative of the Environment Agency.

Otherwise, with respect to available guidance and incorporating the recommended revisions highlighted here, we consider the screening matrix and accompanying documentation has been well prepared and I can confirm that Natural England considers South Cambridgeshire District Council has undertaken the screening process in accordance with the current requirements of the Habitats Regulations.

Again, Natural England would expect that proposed developments are fully supported by provision of sufficient green infrastructure in accordance with the publication 'A Green Infrastructure Strategy for the Cambridge Sub Region' (The Landscape Partnership, 2006) and for Cambridge proposals 'The Nature Conservation Strategy – Enhancing Biodiversity (Cambridge City Council, 2006). On this basis **Natural England support the conclusion that policies in the North West Cambridge Area Action Plan – Preferred Options Draft are unlikely to have significant impacts upon the European Sites located within and in the vicinity of South Cambridgeshire District and Cambridge City, and that an Appropriate Assessment is therefore not required for this document.**

I hope these comments may be useful to your Authority.

Appendix G: Audit Trail

Vision, Objectives & Development Principles

AAP Policy NW1: Vision

Summary of Issues and Options consulted on:

One option for the Vision for the Area was consulted on:
Option 7.1: Provides a draft vision for the development.

Summary of results of Issues and Options Community Involvement:

Option 7.1:

7 objections	6 supports	4 comments
--------------	------------	------------

- Focus too much on the city;
- Plan too dominated by commercial uses;
- Development at expense of residents needs;
- New landscaped edge will not enhance setting of the City;
- Inappropriate to meet the City's wider housing needs here;
- Fails to cover wider sustainability and environmental issues;
- Should emphasise the role of the University in supporting further development of the Cambridge sub-region;
- Fails to ensure separation of Girton

New Options Arising Following Issues and Options Community Involvement:

Not applicable.

Summary of Initial Sustainability Appraisal of Issues and Options:

The option is presented in the form of a vision statement. The vision outlines what the councils hope to achieve by the implementation of the Area Action Plan. To achieve the vision the plan must successfully guide the implementation of a range of planning guidance in a sustainable manner. As the detail of the plan will not be known until later in the plan making process, beyond this Issues & Options stage, the assessment of this option returns unknown outcomes. However, the vision appears consistent with the SA economic objectives but less information on environment and social aspects are provided.

Approach to Preferred Options:

The vision is not intended to be all encompassing but rather to concentrate on key aspects of the development. The vision remains as proposed in the Issues & Options Report but adds references to the role of the City and Sub-Region in higher education and research and to the development contributing to meeting needs before 2021 as requested by the University.

Pursue Option 7.1.

Any Changes resulting from Draft Final Sustainability Report:

- *Sustainability Appraisal Recommendation:*

None proposed

Summary of Preferred Option:

Option 7.1 has been taken forward in Preferred Option NW1 as amended by the addition of references proposed above.

Summary of Results of Preferred Options Community Involvement:

Policy NW1:

8 objections	2 supports
--------------	------------

- Impact on the purposes of the Cambridge Green Belt, needs explicit reference to preservation of the wider historic character of Cambridge and to the specific historic interest of the site and its surroundings
- Need for a highly sustainable development
- Loss of open spaces
- Continuing need for University/College development outside the AAP boundary
- Impact upon Girton and flooding
- Too much emphasis given to meeting University needs at expense of existing communities
- Support for the proposal to address University needs to 2021 and beyond

Alternative Options Resulting from Preferred Options Consultation:

Not applicable.

Response:

- Importance of Green Belt accepted and care has been taken to select an appropriate boundary
- Revise last sentence of Vision to read: "A revised Green Belt and a new landscaped urban edge will preserve the unique character of Cambridge, enhance its setting and maintain the separate identity of Girton village."
- The development is aiming for best practice performance in terms of sustainability
- The development will add to the public open space in the City and in South Cambridgeshire

- The Plan recognises need to maintain a separate identity for Girton and to not worsen downstream flood risks
- The primary purpose of the development is to meet the needs of Cambridge University.

Any Changes Resulting from the Final Sustainability Appraisal:

None proposed.

Tests of Soundness:

Procedural:

- (i) In accordance with Local Development Scheme
- (ii) Compliance with Statement of Community Involvement*
- (iii) Subjected to Sustainability Appraisal

Conformity:

- (iv) with national planning policy and Regional Spatial Strategy
- (v) regard to the Community Strategies**

Coherence, consistency and effectiveness:

- (vi) Policies are coherent and consistent
- (vii) Policies are most appropriate in all circumstances, are founded on a robust and credible evidence base, and relevant alternatives were considered
- (viii) Clear mechanisms for implementation and monitoring
- (ix) Plan is flexible to deal with changing circumstances

*The document has been prepared in accordance with Cambridge City Council's adopted SCI and the minimum regulations set out in The Town and Country Planning (Local Development) (England) Regulations 2004.

** As a joint plan, it should have regard to the Community Strategies of both Councils

Conclusions:

Policy NW1 has been taken forward in the Submission Draft AAP and is considered to be sound.

Vision, Objectives & Development Principles

Policy NW2: Development Principles

Summary of Issues and Options consulted on:

Two options relating to development principles were consulted on:

Option 16.1: Archaeological interests to be taken into account.

Option 17.1: Development to achieve an overall increase in biodiversity.

Summary of results of Issues and Options Community Involvement:

Option 16.1:

2 supports

- No key issues arose in consultation for this option

Option 17.1:

2 objections	9 supports	3 comments
--------------	------------	------------

- The Avenue of Chestnut Trees bordering the 19 Acre Field must be preserved;
- There is no specific safeguard of the SSSI at Travellers Rest Pit;
- All loss of habitats must be kept to a minimum.

New Options Arising Following Issues and Options Community Involvement:

Not applicable.

Summary of Initial Sustainability Appraisal of Issues and Options:

Option 16.1

This measure is overall deemed to have positive environmental benefits relative to the absence of such measures. The extent or significance of such positive impact would be dependent on how the findings of such an investigation are used and how such information would inform any development plans and preferred option mitigation measures.

Option 17.1

This strategy would overall have positive benefits on biodiversity, conservation of habitats and people's access to wildlife, relative to no such strategy being in place. However, the significance and extent of such positive impacts is unknown since preferred options are unknown and the extent to which such a strategy could mitigate against any adverse impacts of these is uncertain at this stage.

Approach to Preferred Options:

Policy NW2 provides essential policy guidance on a number of important issues that are not otherwise addressed in the AAP.

Parts a) to e) of policy NW2 provide positive guidance on how North West Cambridge should be planned and developed. They reflect the vision and objectives for the development, national policy guidance, the location of the site and its importance to the landscape setting of Cambridge. Various studies, (most recently the Inner Green Belt Boundary Study (2002), and the North West Cambridge, AAP Green Belt Landscape Study (2006), including those informing the Structure Plan confirm that the area between Maddingley Road and Huntingdon Road is important to the setting of Cambridge and specifically to its Green Belt setting.

Parts f) to j) of policy NW2 incorporate the essential elements of options 16.1 and 17.1, without incorporating excessive detail and so leave flexibility for future masterplanning. They provide more detailed guidance on the outcomes expected of development at NW Cambridge. References to biodiversity, historic landscape and geological features are consistent with national guidance and also reflect the importance of the existing SSSI, existing biodiversity interests and retained elements of the historic landscape. Part h) requires the development to be accessible to all and to provide good access to public transport. Part g) requires a high quality landscape framework both externally and internally to the development, whilst parts i) and j) seek to ensure that crime is minimised and that planning for waste and recycling is considered from the beginning and not as a later add-on.

Parts k) to s) and part 4) of policy NW2 are intended to incorporate essential protections to matters of importance both to the locality and the wider area. They reflect the highly visible location, which forms the edge of the historic city of Cambridge, its location close to the busy M11, which is a source of noise, vibration and air pollution, and the residential character of adjoining development in Cambridge and in Girton. Land downstream of the development is at risk of flooding as shown in the South Cambridgeshire Strategic Flood Risk Assessment. A number of trees on the site are protected by Tree Preservation Orders such as the double line of chestnut trees bordering the 19-Acre Field. Other trees of significance should also be protected both as an aid to internal landscape design quality and to reflect their part of the historic landscape.

Any Changes resulting from Draft Final Sustainability Report:

- Sustainability Appraisal Recommendation

The main area for change is in strengthening some of the principles already in place, and adding slight amendments to other Development Principles:

1. Long-term protection of the Green Belt should be included;
2. The biodiversity of the site needs to be appraised as swiftly as possible;

3. Principle 3 or 4 should be amended to include light and pollution;
4. Principle 2(j) should be amended to “Provide integrated refuse and recycling facilities and reduce the amount of waste produced through good design”;
5. Principle 2(f) should be amended to say “Enhance and protect the biodiversity...”; and
6. Principle 3(n) should be amended to say “On biodiversity, protected species, archaeological ...”

- *Councils’ Response:*

1. Disagree. This is covered by national planning guidance. Policy unchanged;
2. Noted. No change to policy required;
3. Disagree. This is already covered by NW2 part 3 (k, l & n) and paragraph 2.8, although NW2 part 4 has been strengthened to include a specific reference to lighting;
4. Agree. Policy altered;
5. Agree. Policy altered although recommended wording not used; and
6. Disagree. Planning permission will not be granted where the proposed development or associated mitigation measures would have an unacceptable adverse impact on biodiversity etc. Biodiversity is an all-embracing term therefore any adverse impact on protected species would be considered as the policy stands. Policy unchanged.

Summary of Preferred Option:

A combination of options 16.1 and 17.1 have been taken forward in Preferred Option NW2, which adds further policy guidance concerning matters of importance, which are not addressed elsewhere in the AAP as set out in the response above.

Summary of Results of Preferred Options Community Involvement:

Policy NW2:

16 objections	11 supports
---------------	-------------

- Further detailed transport assessments needed
- Visual impact of the M11 needs to be reduced
- Concern over impact on setting of Girton College (a listed building) and on appreciation of the City at a key gateway into Cambridge
- Historic landscape and existing trees, shrubs and hedges should be protected
- Need to minimise crime on site
- AAP should give primacy to protection of residential amenity
- Need to consider peace and tranquillity of the Ascension Parish Burial Ground
- Flood risk issues

- Existing roads already overloaded
- Light pollution to be avoided and particularly regarding the Astronomical Observatories
- Support from Cambridge University, and regarding the mixed-use proposal, for a healthy community, for biodiversity aspects, for a high quality landscape setting, for safe and convenient access for all, for measures to minimise crime, for protection of residential amenity, on archaeological, historic landscape and geological interests, on adjacent conservation areas, on protected trees

Alternative Options Resulting from Preferred Options Consultation:

Not applicable

Response:

- Further transport assessments will be carried out at masterplanning and planning application stages
- M11 mitigation landscaping should not detract from the setting of the City.
- Existing planning guidance exists to protect the setting of listed buildings, but criteria r) could usefully be amended to include reference to listed buildings as well as to conservation areas
- There is no evidence to support a blanket approach to the protection of existing trees, hedges and shrubs
- Criteria i) is concerned to minimise opportunities for crime
- Criteria k) is intended to protect residential amenity
- The Ascension Burial Ground has been included within an extended Conservation Area which will allow the impact of developments upon it to be taken into account
- The policy does not say that an increase in flood risk will be acceptable
- Planning permission would not be granted for a development where a Transport Assessment shows it to have unacceptable impacts upon the transport system
- Agree that light pollution should be minimised, and that the fourth sentence of paragraph 2.8 should be amended to read: "The Lighting Strategy should also consider the impact of outdoor lighting from the development on the operation of the Institute of Astronomy Observatory at Madingley Road, with a view to minimising any negative impacts"

Any Changes Resulting from the Final Sustainability Appraisal:

None proposed.

Tests of Soundness:

Procedural:

- (i) In accordance with Local Development Scheme

- ✓ (ii) Compliance with Statement of Community Involvement*
- ✓ (iii) Subjected to Sustainability Appraisal
- Conformity:
- ✓ (iv) with national planning policy and Regional Spatial Strategy
- ✓ (v) regard to the Community Strategies**
- Coherence, consistency and effectiveness:
- ✓ (vi) Policies are coherent and consistent
- (vii) Policies are most appropriate in all circumstances,
 ✓ are founded on a robust and credible evidence base, and relevant alternatives were considered
- ✓ (viii) Clear mechanisms for implementation and monitoring
- ✓ (ix) Plan is flexible to deal with changing circumstances

*The document has been prepared in accordance with Cambridge City Council's adopted SCI and the minimum regulations set out in The Town and Country Planning (Local Development) (England) Regulations 2004.

** As a joint plan, it should have regard to the Community Strategies of both Councils

Conclusions:

Policy NW2 has been amended and taken forward in the Submission Draft AAP and is considered to be sound.

Vision, Objectives & Development Principles

Policy NW3: Implementing the Area Action Plan

Summary of Issues and Options consulted on:

It was considered that there were no options for the subject of consultation at the Issues & Options stage.

Summary of results of Issues and Options Community Involvement:

Not applicable.

New Options Arising Following Issues and Options Community Involvement:

Not applicable.

Summary of Initial Sustainability Appraisal of Issues and Options:

Not applicable.

Approach to Preferred Options:

The approach proposed in policy NW3 accords with best practice and national guidance. Masterplanning is required to ensure the development of a high quality and sustainable community for the long-term that will complement Cambridge and provide for the growth of the University. Masterplanning is a requirement of Structure Plan policy P9/2c.

Any Changes resulting from Draft Final Sustainability Report:

- *Sustainability Appraisal Recommendation:*

None proposed.

Summary of Preferred Option:

Policy NW3 should be taken forward as the proposed option as it accords with best practice and national guidance.

Summary of Results of Preferred Options Community Involvement:

Policy NW3:

19 objections	1 supports
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- There should be consultation with local residents on the Masterplan production and two members of the 19-acre field residents' association should be members of all committees considering the Masterplan;
- Further detailed transport assessment should be carried out as part of the Masterplan, this should be included in the policy; and
- Support for the policy from the University including a desire to work collaboratively with the Councils on Masterplan production.

Alternative Options Resulting from Preferred Options Consultation:

Not applicable.

Response:

- The Council has an adopted policy towards community participation in the planning process in its Statement of Community Involvement. This states how and when the City Council will involve the community and key stakeholders in preparing, altering and reviewing its plans and guidance for future development, and how and when it will involve the community in planning applications. It would not be appropriate to depart from this adopted policy in the AAP. The AAP cannot amend the Council Constitution or democratic practices with regard to membership of its policy and regulatory committees. Most meetings of City Council Committees are open to the public but members of the public not as elected members of that Committee with voting rights;
- The Transport Assessment will be a critical part of the planning process subsequent to the adoption of the AAP. Add a new paragraph to the travel section to read: " A Transport Assessment will be required alongside the planning application to allow the travel impact to be properly assessed and adequately mitigated. This will include mitigation against environmental impacts, such as noise, pollution and impact on amenity and health."; and
- The support for the need for a Masterplan is welcomed, although it will need to reflect the final form of the AAP. It is helpful that the University as the major landowner/developer wishes to work in collaboration with the Councils.

Any Changes Resulting from the Final Sustainability Appraisal:

None proposed.

Tests of Soundness:

Procedural:

- (i) In accordance with Local Development Scheme
- (ii) Compliance with Statement of Community Involvement*
- (iii) Subjected to Sustainability Appraisal

Conformity:

- ✓ (iv) with national planning policy and Regional Spatial Strategy
- ✓ (v) regard to the Community Strategies**

Coherence, consistency and effectiveness:

- ✓ (vi) Policies are coherent and consistent
- ✓ (vii) Policies are most appropriate in all circumstances,
are founded on a robust and credible evidence base, and relevant alternatives were considered
- ✓ (viii) Clear mechanisms for implementation and monitoring
- ✓ (ix) Plan is flexible to deal with changing circumstances

*The document has been prepared in accordance with Cambridge City Council's adopted SCI and the minimum regulations set out in The Town and Country Planning (Local Development) (England) Regulations 2004.

** As a joint plan, it should have regard to the Community Strategies of both Councils

Conclusions:

Policy NW3 has been amended and taken forward in the Submission Draft AAP and is considered to be sound.

Site and Setting

Policy NW4: Site and Setting

Summary of Issues and Options consulted on:

5 site footprint options were consulted on:

Option 10.1 - The preferred option of Cambridge University covering the largest footprint, which extends closest to the M11 and furthest down the slope which runs down to Washpit Brook, which runs roughly parallel to the M11 in this area. This option has a large circular central open space on the strategic gap through the development. It would fully meet the University's development aspirations, as set out in the Issues & Options Report.

Option 10.2 – An alternative configuration of the site which is contained at the top of the slope broadly on the 20m contour and includes additional land further south. It has a slightly smaller, but broadly comparable, footprint to 10.1. The footprint has a broad strategic gap but no circular central open space.

Option 10.3 – An option drawn from the recommendations of a Green Belt Landscape Study for this area prepared by David Brown Associates and Richard Morrish Associates (May 2006), which contains development at the top of the slope broadly on the 20m contour and excludes land further south which is identified as being of historic landscape importance. It includes a strategic gap running broadly north south towards Madingley Road

Option 10.4 – Similar to Option 10.3 but with the strategic gap running northeast-southwest to link out towards open countryside out to and beyond the M11.

Option 10.5 – The smallest site footprint with development contained close to the existing built up area of Cambridge.

Summary of results of Issues and Options Community Involvement:

Option 10.1:

9 objections	6 supports	5 comments
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Cambridge University supported this option, as it would meet its development needs/aspirations in full. Many of the objections to this option, including from Girton and Histon & Impington Parish Councils centred around the development paying no attention to the purpose of the Green Belt, the sensitive landscape setting of Cambridge as a compact City and the historical value of the site. Concern was raised about the loss of important views and the loss of biodiversity and substantial areas of habitat. An increase in traffic as a result of the

development was also highlighted as a concern, along with questions about the ability of parts of the site to function due to their proximity to the M11.

Option 10.2:

11 objections	1 support	6 comments
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Cambridge University commented that this option would meet most of its development needs/aspirations. A major concern in relation to this option was that the fragmentation of the development would dissipate the potential for a thriving local centre as well as making public transport provision through the site less sustainable. The strategic gap was criticised for being contrived and of limited value, failing to maintain sufficient separation between Cambridge and Girton. Concerns were again raised about the loss of Green Belt land as well as the effect on areas of both ecological and historical value, with a loss of biodiversity and habitat. Objections were also raised in relation to the prominence of development on the plateau, poor landscape setting and the nature of transport links.

Option 10.3:

11 objections	4 supports	5 comments
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Concerns have been raised that this option would far too severely restrict the use of an urgently needed site in Cambridge and provide less growth capacity for the University. Development under this option would either lead to a substantial reduction in the development capacity of the site or lead to an increase in development densities and heights in order to deliver the University's aspirations. Concerns have been raised that this would lead to unsustainably dense development and an intensification of development that would lead to the coalescence between Cambridge and Girton. Other concerns are that the density of development would lead to a dominance of apartment blocks rather than houses and would also rule out the possibility of plots being made available to self-builders. Concerns remain over the loss of the Green Belt, the affect of the development on important views of key features of the landscape, loss of land deemed important to the setting of Cambridge and the detrimental impact on the SSSI, while others feel that the benefits in terms of setting of the city are not significant. An added concern is that the development would provide no noise buffer for Girton.

Option 10.4:

12 objections	1 support	6 comments
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Concerns have been raised that this option would far too severely restrict the use of an urgently needed site in Cambridge and provide less growth capacity for the University. Development under this option would either lead to a substantial reduction in the development capacity of the site or lead to an increase in development densities and heights in order to deliver the University's aspirations.

Concerns have been raised that this would lead to unsustainably dense development and an intensification of development that would lead to the coalescence between Cambridge and Girton. Other concerns are that the density of development would lead to a dominance of apartment blocks rather than houses and would also rule out the possibility of plots being made available to self-builders. In terms of public transport, concerns are raised that under this option it would be difficult to create a legible public transport route from the main part of the development towards the Madingley Road Park & Ride site. Concerns remain over the loss of the Green Belt, the affect of the development on important views of key features of the landscape, loss of land deemed important to the setting of Cambridge, the detrimental impact on the SSSI and the awkward layout of the strategic gap, while others feel that the benefits in terms of setting of the city are not significant.

Option 10.5:

11 objections	6 supports	6 comments
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Concerns have been raised that this option would lead to an overly dense and unsustainable development on a small portion of the site and lose an opportunity to open the site to the public and create an attractive built fringe and that this would not make good use of land released from the Green Belt. Concerns raised in relation to Options 10.3 and 10.4 are mirrored for this option, i.e. that the density of development would lead to a dominance of apartment blocks rather than houses and would also rule out the possibility of plots being made available to self-builders. Concerns are also raised that this option would be contrary to the requirements of the Structure Plan in that it does not maximise the use of land close to the urban edge, that it would cause difficulties in delivering elements of the draft East of England Plan as it restricts development from taking place in South Cambridgeshire and, that by preventing development in South Cambridgeshire, it would not be able to help deliver some of the 1,000 dwelling shortfall identified by the Inspector examining the South Cambridgeshire Core Strategy DPD. In not meeting the University's needs it is also felt by some objectors that this option would fall entirely short of serving the urgent need for key worker housing for University staff and that as adequate provision of services and facilities would not be met in the vicinity it could further increase the need to travel. There is a continuing concern from some objectors that this option still represents loss of Green Belt, while others feel that the benefits in terms of setting of the city are not significant.

New Options Arising Following Issues and Options Community Involvement:

None of the site options consulted upon performed sufficiently well against the 2 key tests of meeting the University's needs and protecting the Green Belt setting of Cambridge that they could be recommended as the preferred site.

In order to try and identify a site footprint that could better meet the 2 key tests of meeting the University's needs and protecting the Green Belt setting of Cambridge,

the Joint Officer Team developed two additional Options derived from those consulted upon, Sites A and B. The aim of these new options was to try to protect the Green Belt setting by keeping development generally to the 20m contour on the Washpit Brook valley slope (as recommended in the David Brown Landscape Study) but to compensate elsewhere to increase the site footprint to more closely match the University's needs/aspirations. This was achieved by including more land in the southwest part of the site and narrowing the green gap through the development between the two sections of the development. Two alternative approaches to the width of the strategic gap are identified, but otherwise the sites are very similar.

The University put forward an additional option submitted as part of the University's response to the Issues & Options consultation; Option C. It pulls development to a limited extent up the slopes of the Washpit Brook valley but still well below the 20m contour. This Option has been endorsed by the University's North West Cambridge Committee.

Through partnership working with the University on the issue of the site, the University raised concerns about the Councils' emerging site options A and B in terms of the scale of the development footprint, the importance of the slope in protecting the setting of Cambridge and whether these options provided an appropriate site configuration to ensure a sustainable form of development, particularly at the north western part of the site.

Through this process, the University also informally submitted a further variant, Option D, which is similar to Option C but, like Option A maintains the green gap to a constant and narrow width instead of opening out as in the previous University preferred Options 10.1 and C. In comparison to C, option D also presents a more indented outer boundary towards the west.

At the meeting of the Joint Member Reference Group on 29 June 2007, a further Option, subsequently referred to as Option E, emerged and was recommended by the Group to the two Councils as a deliverable outcome. The outer boundary of Option E is similar to Options A and B. However, it varies from those options in its treatment of the strategic gap; this is retained at 200m immediately south of Huntingdon Road but then extends into a larger central open space in a similar fashion to 10.1. Just south of this central green space it then narrows to 100m as it runs towards Madingley Road.

Site Options A to E were subject to detailed site assessments using the same assessment criteria as site options 10.1 to 10.5.

Summary of Initial Sustainability Appraisal of Issues and Options:

Options 10.1 to 10.5:

The relative sustainability of the options is dependent on the balance between the degree of land take and provision of employment opportunities. Although options

10.1 and 10.2 meet the development aspirations of the University, the impact on the character, setting and landscape of Cambridge and Girton is more extensive. Option 10.5 performs well against landscape, ecological and historical interest impacts. Providing the affordable housing requirement is fulfilled in option 10.5 the main area of underperformance is the lack of employment opportunities due to reduced provision of research facilities. Design specifications for option 10.1 could reduce light pollution impact and for options 10.1 to 10.4 could reduce the prominence of buildings on the top of the ridge. Mitigation measures could reduce the resource impact of options 10.1 and 10.2, e.g. use of recycled aggregates, water efficiency measures and energy efficiency.

Cumulative, synergistic and indirect impacts: The cumulative environmental impact of options 10.1 and 10.2 will have greater significance on the immediate local environment in terms of biodiversity, loss of open space and character, setting and landscape. The significant cumulative impact for Option 10.1 lies with the character, setting and landscape, due to: the proximity of the option to the M11; the loss of the sweep of land which is important to the setting of Cambridge and the adverse impact on the character and setting of Girton. The significant cumulative impact for option 10.2 lies with biodiversity and natural heritage impacts due to the amount of land take and the loss of greenbelt fields in the south of the site. Mitigation measures such as building design will decrease the impact of option 10.2 on the landscape, particularly buildings on the higher areas of the site such as the ridge. Option 10.5 will have a cumulative economic impact through the potential loss of employment opportunities both within the proposed research facilities and the services that the larger land take options could accommodate more widely.

Options A to E:

All five options will have negative impacts from loss of open space and green belt land. Options C and D result in greater land take than Options A, B and E. Options A, B and E increase the threat to cultural heritage due to the south west part of the site being in close proximity to sensitive historical features.

All five options are likely to impact on views particularly of Girton. Options C and D obstruct views of the site along the whole side of the development due to the site traversing the 20m contour. Options A, B and E traverse the 20m contour to the south west of the site. Consideration of heights and mass of buildings and landscaping and impact on perception of green belt gap will all be important considerations in order to minimise cultural impacts of all of the options.

Options C and E, and to a lesser extent Option B, perform better than Options A and D, with regards to prevention of the merging of Girton and the new development as a larger area is left as part of the strategic gap. This could also have benefits for protection of the SSSI. In addition, the confinement of options A, B and E to be largely above the 20m contour should marginally reduce the loss of green belt land to the west of the development, in comparison to Options C and D.

All five options are likely to have negative effects on water stress and energy use. The impacts could be mitigated through inclusion of water and energy use efficiency measures into the development.

All five options perform well against economic and social objectives as the options meet the aspirations of the University, provide affordable housing and a local centre. However, the implications of the development on employment creation and transport, including private car use, will depend on the details of the designs for each option. Impacts on health and social inclusion will also depend on the detailed design of each option.

Approach to Preferred Options:

The Councils undertook a detailed and systematic assessment of the sites that were subject to consultation in the Issues & Options document in September 2006, taking into account the strategic context for the identification of this location in the Structure Plan for predominantly University-related uses and the requirements of a review of the Green Belt in locations on the edge of Cambridge. This process is fully documented in the supporting document to the AAP, "Site Footprint Assessments".

Various studies, including those informing the Structure Plan, confirm that the area between Madingley Road and Huntingdon Road is important to the Green Belt setting of Cambridge. Notwithstanding, the Structure Plan proposes the release of land from the Green Belt in this location specifically to meet the long-term needs of the University. Given this, the two key criteria (in no particular order) can be considered to be:

- Satisfying the needs of the University
- Maintaining the purposes of the Cambridge Green Belt.

A set of site assessment criteria was prepared, drawn from the Issues & Options report Vision and Objectives for NW Cambridge, to ensure that the full range of considerations was taken into account in the assessments that are necessary to lead to a quality and sustainable development. These were subject to focused consultation with key stakeholders including the County Council, Cambridge University, and local Parish Councils and residents groups. The detailed assessments of the 5 options consulted on, 10.1 to 10.5, identified that all those options are capable of being developed but none are able to completely satisfy all the criteria each having a different mix of advantages and disadvantages.

The site footprint assessments have therefore tested the 2 key criteria alongside a variety of other criteria. Those assessments have indicated that there are no absolute constraints on any particular site footprint for matters such as air quality, noise, drainage, and ecology. There are other factors that are relevant to take into account alongside meeting the University's needs and impact on the Green Belt, such as the need to ensure that a sustainable form of development can be

achieved, historic landscape impacts and connectivity within the development. However, these do not have the same weight in terms of strategic policy.

None of the site options consulted upon perform sufficiently well against the 2 key tests of meeting the University's needs and protecting the Green Belt setting of Cambridge that the joint officer team, comprising planners, urban designers and landscape officers of both Councils, was able to recommend one of them as the preferred site. The particular issues were that Option 10.1 as preferred by the University as best meeting its development needs/aspirations, has a greater impact on the Green Belt setting of Cambridge because it brings development further down the slope and in relatively close proximity to the M11. Conversely, Option 10.3, which was suggested by the Green Belt Landscape Study as the largest site option that retains a "workable" Green Belt setting to Cambridge, provides significantly less land than sought by the University.

Whilst none of the site options would be large enough to fully meet the University's needs, which for housing have been demonstrated to be significantly more than they seek in this location, and there is therefore no specific land area that should be sought for the site footprint, there is a strategic objective to provide land for the needs of the University and therefore to provide as large a site as is appropriate in this sensitive location on the edge of Cambridge consistent with maintaining the Green Belt setting of the City.

Therefore, a number of further site footprint options were identified during the assessment process as set out in the earlier section, Options A to D, and these were also tested against the same site assessment criteria and subjected to Initial Sustainability Appraisal in the same way as the options consulted on.

Sites A and B are hybrid options developed by officers which sought to retain development at the top of the slope in the most sensitive northern and middle parts of the outer boundary, but to allow more development on lower lying land to the north of the Park & Ride site. They also maintain the full gap of 200m on the Huntingdon Road frontage but include a reduced strategic gap further south of 100m and 200m respectively to maximise the development footprint but also to help provide better community cohesion than the University's original preferred site which had a large central open space.

Sites C & D were put forward by the University at the consultation stage and during the assessment of options respectively. They pull back development slightly from Washpit Brook but not as far as the 20m contour. In these options the University moved away from such a large open space and narrowed the central open space as demonstrated by Options C and D.

There were also discussions with the University's officers during the assessment process and to assist that process, additional work has been prepared by consultants for Cambridge University and shared with the Councils on ecological issues, air quality and noise, and some views modelling of site options.

In particular, the views modelling helps to provide an impression of the potential difference in impact on the Green Belt setting of Cambridge of the different site footprints. The views modelling must be treated with a certain amount of caution, but it helps to provide a consistent comparison of the relative impacts from key middle distance views from the west and local views from the M11 and public footpaths. It shows each footprint with a wall of development on the boundary 4 storeys high. Clearly this is not how development would actually appear and there would be some breaks in building line and variation in built form. However, that is true of all site options and this approach provides a consistent approach for broad comparative purposes.

The University considers that there is a minor perceived difference between options and does not consider that the views from the M11 are an important issue because they consider they are fleeting views from fast moving vehicles. This setting was identified by the recent Cambridge Local Plan Inspector's Report as an important factor and that "the M11 should have an open space buffer because at present the M11 runs largely through countryside west of Cambridge" (Inspector's Report paragraph 2.7).

The joint officer team concluded that the recommended site footprint should be retained broadly at the top of the slope that runs down from a plateau towards the M11, because development that extends down the slope would have an unacceptable harmful impact on the immediate Green Belt setting of Cambridge.

The officer team has investigated options to secure the maximum site footprint, in order to go as far as possible towards meeting the University's stated needs/aspirations. The team recommended site Option A to the North West Cambridge Joint Member Reference Group (JMRG) meeting on 29 June 2007.

The site footprint includes a lower lying area of land to the north of the Madingley Road Park & Ride and closer to the M11, where development can be more effectively screened and where it will have less impact on Green Belt setting, even though this area has some features of historic landscape interest. It also goes closer to potentially important wildlife habitats but only where the ecological advice is that these interests can be successfully mitigated. The footprint in Option A also narrowed down the strategic gap south of Huntingdon Road running through the development to maximise the footprint whilst retaining this important structural feature to help ensure a more integrated and sustainable new community.

At the JMRG meeting, City Members raised concerns that there should be a large scale open space within the site in the strategic gap running through the development to reflect the character of Cambridge, more akin to the large open space proposed in the University's 10.1. This would be larger than that required by the Councils' open space standards and would be of a strategic scale serving a wider area of this part of the city. It would benefit by being shielded by development from the M11 and so would provide a space of high amenity value.

A further site option was subsequently developed with Lead Members of the two Councils that is based on Option A but with a larger central open area – Option E.

The site footprint of Option E is 69ha, compared with the University's original preferred site of 77ha, and the alternative it suggested for discussion through the process of 75ha (Option D). However, the University commented in its representations to the Issues & Options report that site 10.2 that had a footprint of 68ha "has a sufficient developable area to meet the University's needs in terms of housing, academic and commercial research floorspace". It is therefore of an order that could accommodate the University's stated needs/aspirations. It should also be remembered that none of the site options, including 10.1 can fully meet the University's stated needs/aspirations for housing for its own staff and therefore there is no specific target figure for the site footprint.

The University has expressed concerns that the shape of the site in Option E would not be capable of delivering an appropriate form of development, particularly at the NW part of the site where it is relatively narrow in order to retain development around the 20m contour. However, urban design officers of both Councils have confirmed their view that the recommended site can be developed satisfactorily and demonstrated this through an illustrative masterplan (in the "Site Footprint Assessments" document).

The joint officer team took full account of the strategic requirement to ensure that the site footprint is maximised to help meet the needs/aspirations of the University into the future. However, the team considered that this must be balanced against the long-term protection of the Green Belt, as required by the Structure Plan, a key purpose of which is to maintain and enhance the quality of the setting of Cambridge.

Site footprint Option E is considerably more extensive than would be the case if it were not for the priority being given by the Structure Plan and by both Councils to the needs of the University, in the light of the importance of the University to Cambridge. Indeed, there would be no land released from the Green Belt for development in this location, through either as already the case through the Cambridge Local Plan or as proposed in the Area Action Plan.

The meeting of Cambridge City Council's Environment Scrutiny Committee on 10 July 2007 resolved, and the Executive Councillor for Climate Change and Growth then approved, the following:

"That the City Council is not sympathetic to the report's analysis of the landscape setting nor to the imperative of preserving the setting of the city in the manner recommended in the report. Furthermore, the City Council does not accept that such considerations override the needs of the University or the urban design requirements set out in the criteria. In particular, the City Council is keen to ensure that achieving green space internal to the development, and shielded from the visual and auditory impact of the M11 Motorway, should be a primary objective. Nevertheless,

the City Council acknowledges the strength of the South Cambridgeshire District Council feeling on the landscape setting issue and that, while the City Council is in favour of Option 10.1, it recognises that the only way to proceed is reluctantly to endorse the site footprint and Green Belt boundary as set out in paragraphs 3.2.2 –3.2.5 [of the officer report] and shown in the map of Option E, subject to taking legal advice about the planning law relating to joint working after which the final decision as between favouring Option 10.1 or Option E will be taken by the Executive Councillor following consultation with the Chair and the Spokesperson of the Scrutiny Committee.”

Regarding the issue of joint working, the legal advice received by the City Council was that at independent examination it would not in practice be possible for the City Council to promote one option as sound and meanwhile to try to canvas another alternative option. The City Council’s Executive Councillor subsequently decided that Option E should be taken forward.

South Cambridgeshire District Council held a Special meeting of Council on 17 July 2007 where the recommendation of Option E was agreed for the reasons set out in the joint officer report.

Any Changes resulting from Draft Final Sustainability Report:

- *Sustainability Appraisal Recommendation:*

Policy should be reworded to read:

“to ensure separation is maintained between Cambridge and Girton village and to provide a central open space for biodiversity, landscape, recreation and amenity, whilst ensuring a cohesive and sustainable form of development.

- *Councils’ Response:*

Agree. Policy altered.

Summary of Preferred Option:

The site footprint was the most difficult aspect of the consideration of representations made on the Issues & Options consultation document. The challenge facing the Councils was to decide the most appropriate site footprint which balances the strategic priority for the release of land from the Green Belt to meet the needs/aspirations of the University into the long term, in a sustainable urban extension to Cambridge, with the need to maintain an appropriate Green Belt setting to the historic city.

There is a need under the new plan making system for a clear and defensible evidence base. The supporting documents to the Preferred Options Draft AAP provide a detailed evidence base.

The Councils have a different view on the interpretation of the Green Belt setting of Cambridge and the weight to be given to the University's needs/aspirations and the need for a large central open space as a focus for the development. However, in the interests of moving forward the preparation of a joint Area Action Plan to enable development to come forward as swiftly as possible where the University has or can demonstrate a need, and notwithstanding the strong views expressed by both Councils in relation to land both in and outside their respective administrative areas, they have agreed a preferred site footprint to take forward for public participation.

There will be an opportunity for interested parties that may have concerns that the footprint is too small, too large or the wrong shape, to take the opportunity to make representations at the Preferred Options consultation that provide evidence to support any concerns about the preferred site footprint. Any such concerns should be progressed through making objections to the policy for the preferred site in the draft Area Action Plan, and as part of that objection to promote as an alternative any of the sites previously considered by the Councils or to put forward any other alternative site for consideration when the Councils are deciding the AAP for submission.

Any interested party that remains unhappy about the submitted plan will then have the opportunity to have any objections to the AAP heard at a Public Examination in front of an independent Inspector who will decide the final form of the AAP.

Option E has been taken forward in preferred option NW4, as outlined above.

Summary of Results of Preferred Options Community Involvement:

Policy NW4:

23 objections	1 supports
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- Objections from local residents that the Preferred Option is too limited and would result in over-development with higher densities which would adversely impact on residential amenity and the Ascension Parish Burial Ground; support therefore for the University's site footprint set out in Option 10.1
- Lower densities and building heights with more green open spaces needed on edges of the development where it abuts existing properties
- The concept of the development of the strategic gap and the central open space is supported although reference to the necessary protection of the Travellers Rest pit SSSI is sought.
- The site footprint is insufficient to meet the needs set out in other policies within the AAP or the future needs of the University, and would result in a poor and inefficient development configuration; the developable area identified is inadequate for 2,500 homes and student housing, research & development buildings and neighbourhood facilities

Alternative Options Resulting from Preferred Options Consultation:

In response to the Preferred Options consultation, the University submitted an alternative site footprint.

This latest proposal is based upon a revision to option 10.1, the new proposal:

- Amends the development boundary on the M11 edge widening the landscaped buffer between the M11 and development to establish a wider "green foreground" to the new urban edge of Cambridge;
- Carefully considers existing ecological corridors on the site including existing hedgerows to be maintained and integrated throughout the development; inclusion of SuDs Corridors; and retention of habitat and foraging grounds for great crested newts and badgers on site;
- Continuing the integration of student housing and residential development, though now concentrated nearer to existing collegiate facilities in Girton in the northern portion of the site; and
- The development of specific principles of development for each of the key open spaces within the scheme, including the strategic gap between Girton & Cambridge and the landscaped M11 edge.

Response:

- The preferred site footprint takes into account a wide range of interests including the degree to which the University's needs can be met and the importance of the Green Belt purposes in this location. Indeed, this area was identified during the preparation of the Cambridgeshire Structure Plan as performing important Green Belt functions such that it should not be released for general development. However, in the light of evidence of need presented by the University, a lack of suitable alternative locations, and the importance of the University of Cambridge, the Structure Plan identified that land should be released from the Green Belt between Madingley Road and Huntingdon Road specifically to help provide for the University's long term development needs, and only brought forward for development when the need arises.
- Policy NW2 sets out a number of overarching development principles that will guide the development of North West Cambridge, with the aim that development takes account of its surroundings, including existing buildings, open spaces and existing urban and villages edges to ensure that development does not harm local amenity and where possible brings benefits to the area. It will be for the subsequent masterplanning process and planning application stages to take this forward in designing the development to achieve appropriate landscaping on the edge of the development and to safeguard the amenity of existing properties. Masterplanning will also consider how best to protect the character of existing features of interest including the Ascension Parish Burial Ground.
- Disagree as the necessary protection of the Travellers Rest pit SSSI is considered in policy NW 2 part f which states that development proposals

should, as appropriate to their nature, location, scale and economic viability protect and enhance the biodiversity of the site and incorporate historic landscape and geological features. Furthermore, paragraph 2.8 specifically states that studies may be required to consider how best to incorporate the Travellers Rest Pit SSSI into the development. However, any study should not just address noise and air pollution concerns that may arise but should cover a full range of potential adverse impacts.

- Delete reference to “noise and air pollution concerns” in paragraph 2.8 and replace with a broader reference to “any adverse impacts”.
- The Councils have looked again at the site footprint to provide a final “health check” on the site boundary before submission testing it against the AAP objectives. This proposed relatively modest amendments to the site footprint boundary in South Cambridgeshire, which increase the site area but retain a green foreground setting to Cambridge provided by the slope of land rising from the Washpit Brook. It essentially proposes that the developable area increases by around 3.9 hectares, taking the total developable site area to approximately 73 hectares and the total housing capacity to 2325 dwellings which remains within the range sought by the University.

Any Changes Resulting from the Final Sustainability Appraisal:

None proposed.

Tests of Soundness:

Procedural:

- (i) In accordance with Local Development Scheme
- (ii) Compliance with Statement of Community Involvement*
- (iii) Subjected to Sustainability Appraisal

Conformity:

- (iv) with national planning policy and Regional Spatial Strategy
- (v) regard to the Community Strategies**

Coherence, consistency and effectiveness:

- (vi) Policies are coherent and consistent
- (vii) Policies are most appropriate in all circumstances, are founded on a robust and credible evidence base, and relevant alternatives were considered
- (viii) Clear mechanisms for implementation and monitoring
- (ix) Plan is flexible to deal with changing circumstances

*The document has been prepared in accordance with Cambridge City Council’s adopted SCI and the minimum regulations set out in The Town and Country Planning (Local Development) (England) Regulations 2004.

** As a joint plan, it should have regard to the Community Strategies of both Councils

Conclusions:

Policy NW4 has been amended and taken forward in the Submission Draft AAP and is considered sound.

Housing

Policy NW5: Housing Supply

Summary of Issues and Options consulted on:

One housing density option was consulted upon

- Option 11.2 – Higher housing densities will be located away from existing housing and close to the main public transport routes and services and facilities. Lower densities and other College, University or research related buildings with extensive green settings will be located adjacent to existing housing.

Summary of results of Issues and Options Community Involvement:

Option 11.2:

9 objections	3 supports	2 comments
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- Focus should be on reduced impacts on the countryside and overall setting of the City not just areas adjacent to developments;
- Should be located adjacent not close to public transport routes;
- High density housing is not conducive to a healthy life;
- Concern about loss of private open space & the extent to which public open space can provide a viable alternative;
- A good number of lower density houses would add to the overall quality of the area;
- This option is contrary to established Green Belt purposes;
- College and University or related research buildings should not be located adjacent to existing housing;
- Option does not allow potential residents to use a more readily accessible means of transport in terms of their being close to main public transport routes;
- It will be important to provide sufficient informal open space close to areas of high housing density.

New Options Arising Following Issues and Options Community Involvement:

Not applicable.

Summary of Initial Sustainability Appraisal of Issues and Options:

The construction of higher density buildings away from existing buildings will be beneficial for integration with existing buildings and result in a less visually cluttered and displeasing landscape than there may otherwise have been. However placing these buildings in proximity to areas with biodiversity interest may also have negative effects. To avoid these effects the requirement of development to undergo

ecological assessment and daylight assessment should be considered for inclusion within the DPD.

Approach to Preferred Options:

Government policy is for the achievement of higher residential densities in the most accessible locations, particularly close to services and facilities or with good public transport access to them. The Structure Plan requires at least 40 dph in such locations but significantly higher densities in planned new communities. As a new urban extension to Cambridge where a focus on sustainable travel modes is a priority, and particularly having regard to the high proportion of dwellings proposed for University staff and students (some of whom will have the opportunity to travel sustainably to work in nearby University and related developments both on the site and in West Cambridge to the south of Madingley Road) the proposed average net density of 50 dph is appropriate and reasonable in policy terms. Whilst there may be sensitive areas within the site where lower than the average would be appropriate, there will also be opportunities for higher densities on the public transport corridors and in and close to the local centre. The final net density of development in particular parts of the site will be determined through the masterplanning process, and this will include consideration of the most appropriate form of development where it adjoins existing residential properties. The scale and form of development, together with the siting of roads, footpaths and areas of open space are all important aspects to be considered in relating the new development to existing houses, and is not simply about crude overall densities. It would not be an efficient use of the site if development densities were necessarily to reflect adjoining developments, particularly with respect of the large detached properties in large gardens fronting Huntingdon Road. For example large detached residential properties may have very similar characteristics in terms of visual amenity to a terrace of town houses or an apartment building, which may have a higher density in terms of number of units within a single built footprint. Whilst the preferred option was agreed, the proposed AAP policy clarifies this point and replaces lower densities close to existing housing with development of an appropriate scale and form where it adjoins existing housing.

Any Changes resulting from Draft Final Sustainability Report:

- *Sustainability Appraisal Response:*

None proposed.

Summary of Preferred Option:

Option 11.2 has been taken forward in preferred option NW5, the proposed average net density of 50 dph is appropriate and reasonable in policy terms. The proposed AAP policy replaces lower densities close to existing housing with development of an appropriate scale and form where it adjoins appropriate housing to recognise that this is the relevant consideration in terms of protecting residential amenity of existing properties.

Summary of Results of Preferred Options Community Involvement:

Policy NW5:

4 objections	0 supports
--------------	------------

- Two- storey houses to be provided adjacent to site edges with 30 metre gardens adjacent to residential in interests of residential amenity and wildlife
- Density of at least 50 dph is too high, local infrastructure will not cope and the development will not be sustainable
- Higher densities should be not be 'at' public transport stops but with easy access to them
- A vast superstore will be needed
- NW5 should also refer to Collegiate housing needs
- Provision for students at North West Cambridge should not prejudice proposals for student housing elsewhere in Cambridge

Alternative Options Resulting from Preferred Options Consultation:

Not applicable

Response:

- Residential amenity can be protected without an inflexible approach to edge development adjacent to existing residential
- Smaller gardens can function effectively as wildlife havens
- Future masterplanning will have to take account of residential amenity and local character issues
- The evidence is that infrastructure needs can be accommodated
- No large superstore will be needed, only local shops are proposed
- Agree that the policy wording could be refined, clarify that higher densities are appropriate close to public transport stops rather than at them

Any Changes Resulting from the Final Sustainability Appraisal:

None proposed.

Tests of Soundness:

Procedural:

- (i) In accordance with Local Development Scheme
- (ii) Compliance with Statement of Community Involvement*
- (iii) Subjected to Sustainability Appraisal

Conformity:

- ☑ (iv) with national planning policy and Regional Spatial Strategy
- ☑ (v) regard to the Community Strategies**

Coherence, consistency and effectiveness:

- ☑ (vi) Policies are coherent and consistent
- ☑ (vii) Policies are most appropriate in all circumstances,
☑ are founded on a robust and credible evidence base, and relevant alternatives were considered
- ☑ (viii) Clear mechanisms for implementation and monitoring
- ☑ (ix) Plan is flexible to deal with changing circumstances

*The document has been prepared in accordance with Cambridge City Council's adopted SCI and the minimum regulations set out in The Town and Country Planning (Local Development) (England) Regulations 2004.

** As a joint plan, it should have regard to the Community Strategies of both Councils

Conclusions:

Policy NW5 has been amended and taken forward in the Submission Draft AAP and is considered to be sound.

Housing

Policy NW6: Affordable Housing

Summary of Issues and Options consulted on:

One affordable housing option was consulted upon:

- Option 11.1 – The target will be to secure 50% affordable housing.

Summary of results of Issues and Options Community Involvement:

Option 11.1

4 objections	1 support	3 comments
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- Term affordable housing misleading – replace with Key Worker;
- Provision needs to take account of viability;
- Requirement for affordable housing should be indicative and open to negotiation.

New Options Arising Following Issues and Options Community Involvement:

Not applicable.

Summary of Initial Sustainability Appraisal of Issues and Options:

The option is generally considered sustainable, having negligible environmental and economic effects. Affordable housing should also be of a high quality standard, the proposed mitigation should be significant to ensure that quality is not sacrificed for affordability and as a result producing environmental problems. The text around the option indicates need for key worker housing for people working for the university. The option therefore will not result in socially rented accommodation being provided, which excludes some members of the population from the development.

Approach to Preferred Options:

Affordable housing is the appropriate overall term to use, which by definition includes housing for key workers. The draft AAP should however make clear that on this site, the type of affordable housing sought will specifically be that to meet the needs of Cambridge University and College key workers. The 50% target is derived from the viability evidence prepared on behalf of Cambridge University and considered at the Cambridge Local Plan Public Inquiry in 2005 and which resulted in a change to the affordable housing requirement from the previous proposed target of 70%. It therefore has an evidence base and has recently been considered by an independent Inspector. There is therefore no justification for

changing from the specific requirement and creating uncertainty. Option 11.1 is not a plan policy but rather an option and the actual AAP policy will be written to conform to the guidance given in PPS3 Housing for affordable housing, which specifically requires account to be taken of various factors including viability. This is also consistent with the approach taken recently in the Inspectors' Reports for the South Cambridgeshire Development Control Policies and Northstowe Area Action Plan DPDs.

Any Changes resulting from Draft Final Sustainability Report:

- *Sustainability Appraisal Recommendation:*

None proposed.

Summary of Preferred Option:

Option 11.1 has been taken forward in preferred option NW6, it is consistent with the approach currently set out in the Cambridge Local Plan for the part of this site in Cambridge City, and the viability evidence considered by the independent Inspector as part of the Local Plan Inquiry. The draft AAP policy will clarify that affordable housing must be for University and College key workers and that development viability will be a relevant consideration.

Summary of Results of Preferred Options Community Involvement:

Policy NW6:

3 objections	3 supports
--------------	------------

- Inclusion of words 'at least 50% affordable housing' is unsound and not supported by the evidence
- Cambridge Local Plan Inspector set a target of 40% affordable housing
- Wording is too inflexible
- Support affordable housing as likely to generate fewer car trips
- Support inclusion of College key workers

Alternative Options Resulting from Preferred Options Consultation:

Not applicable

Response:

- Agree because the Cambridge Local Plan Inspector considered the viability evidence and did not include words such as 'at least' and 'or more'
- Policy takes viability and other factors into account and is not inflexible
- The equivalent Cambridge Local Plan policy set a 50% target, the objection from the Bursars Committee is incorrect

- Delete the words 'at least' from the first sentence of the policy
- Amend paragraph 4.6 to make it clear that the University could provide more than 50% affordable housing if it wanted to

Any Changes Resulting from the Final Sustainability Appraisal:

None proposed.

Tests of Soundness:

Procedural:

- (i) In accordance with Local Development Scheme
- (ii) Compliance with Statement of Community Involvement*
- (iii) Subjected to Sustainability Appraisal

Conformity:

- (iv) with national planning policy and Regional Spatial Strategy
- (v) regard to the Community Strategies**

Coherence, consistency and effectiveness:

- (vi) Policies are coherent and consistent
- (vii) Policies are most appropriate in all circumstances, are founded on a robust and credible evidence base, and relevant alternatives were considered
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Conclusions:

Policy NW6 has been amended and taken forward in the Submission Draft AAP and is considered to be sound.

Housing

Policy NW7: Balanced and Sustainable Communities

Summary of Issues and Options consulted on:

3 balanced and sustainable community options were consulted upon:

- Option 11.3 – Components of housing (student, University Key Worker and market) mixed and integrated across the site.
- Option 11.4 – Student accommodation as a separate University Quarter, whilst University Key Worker and market housing mixed and integrated across the site.
- Option 11.5 – Student accommodation and University Key Worker housing as a separate University Quarter.

Summary of results of Issues and Options Community Involvement:

Option 11.3:

3 objections	1 support	1 comment
--------------	-----------	-----------

- Student accommodation should be located in a dispersed manner in the centre of the site and fringe facing the M11;
- Development should be restricted to teaching accommodation & housing for students and key workers as opposed to market housing;
- Normal objectives for housing mix are not relevant here;
- Appropriate distribution of housing mix should be determined as a response to identified needs at the time of development

Option 11.4:

2 objections	3 supports	2 comments
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- Development should be restricted to teaching accommodation & housing for students and key workers as opposed to market housing;
- This might undermine the marketability of market housing;
- Normal objectives for housing mix are not relevant here;
- Appropriate distribution of housing mix should be determined as a response to identified needs at the time of development

Option 11.5:

2 objections	1 support	1 comment
--------------	-----------	-----------

- Development should be restricted to teaching accommodation & housing for students and key workers as opposed to market housing;

- Normal objectives for housing mix are not relevant here;
- Appropriate distribution of housing mix should be determined as a response to identified needs at the time of development

New Options Arising Following Issues and Options Community Involvement:

Not applicable.

Summary of Initial Sustainability Appraisal of Issues and Options:

Option 11.4 performs best and strikes a balance between enabling the student population to live in a distinct area, whilst not completely separating the University population from the market housing. Whether the student population is undergraduate or postgraduate and the design and planning of the housing will determine the extent of the sustainability issues outlined above. (NB. See errata to Initial Sustainability Appraisal)

Approach to Preferred Options:

The creation of sustainable, inclusive, mixed communities is one of the Government's key strategic housing policy objectives as set out in PPS3 Housing at paragraphs 9, 20, and 37, and in its policy statement 'Delivering Affordable Housing' of November 2006 which states that the Government believes everyone should have the opportunity of a decent home, which they can afford, within a sustainable mixed community. Amongst the benefits of pursuing such an approach are that it will avoid the creation of areas of monocultural housing with its implications for social cohesion and exclusion and enable the provision of the key worker housing to be delivered with greater certainty because of its having to at least come forward with the open market housing rather than at some later date.

Whilst student housing is better provided primarily in a separate University quarter because it has different characteristics and needs, the University and College Key Worker Housing should be mixed and integrated with the market housing across the site consistent with Government policy.

Pursue option 11.4.

Any Changes resulting from Draft Final Sustainability Report:

- *Sustainability Appraisal Recommendation*

Background paragraph 4.9 should be amended to clarify the University's position on 'car free', and in particular their policy for this site.

- *Councils' Response*

Disagree as this is adequately covered in paragraph 6.21. Policy unchanged.

Summary of Preferred Option:

Option 11.4 has been taken forward in preferred option NW7, it provides for student accommodation as a separate University Quarter to reflect its different characteristics and needs, and requires University Key Worker and market housing mixed and integrated across the site consistent with Government policy and to secure a mixed and balanced community.

Summary of Results of Preferred Options Community Involvement:

Policy NW7:

5 objections	2 supports
--------------	------------

- Height, form and densities of development adjoining existing residential to be similar to that residential and increase away from those boundaries
- Concerns re affordable housing distribution, meaning of the word 'small'
- No justification for concentrating students in a University quarter
- Housing mix should apply to the market housing as well as to the affordable housing
- Support for provision of lifetime homes, and for affordable housing because it will generate fewer car trips

Alternative Options Resulting from Preferred Options Consultation:

Not applicable

Response:

- Concerns about height, density and form are matters for policy NW5, and are further considered at paragraph 4.5 of the Preferred Options Report, such an inflexible approach is not justified
- Intermingling of affordable and market housing is common practice locally and conforms to national planning policy
- Add an explanation of the word 'small' in respect of housing clusters to paragraph 4.9 (of between 6 and 25 dwellings)
- Agree that student housing should be able to be provided in each phase of the development because this will smooth delivery, because over half is likely to be for post-graduates who can own cars and who may have families and because there is little recent history of residential amenity being affected by proximity to College student housing. Amend part 1 of the policy to read: "Affordable housing will be intermingled with the market housing in small groups or clusters, whilst the student housing can be provided in a number of groups distributed across each phase of development".

Any Changes Resulting from the Final Sustainability Appraisal:

None proposed.

Tests of Soundness:

Procedural:

- (i) In accordance with Local Development Scheme
- (ii) Compliance with Statement of Community Involvement*
- (iii) Subjected to Sustainability Appraisal

Conformity:

- (iv) with national planning policy and Regional Spatial Strategy
- (v) regard to the Community Strategies**

Coherence, consistency and effectiveness:

- (vi) Policies are coherent and consistent
- (vii) Policies are most appropriate in all circumstances, are founded on a robust and credible evidence base, and relevant alternatives were considered
- (viii) Clear mechanisms for implementation and monitoring
- (ix) Plan is flexible to deal with changing circumstances

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** As a joint plan, it should have regard to the Community Strategies of both Councils

Conclusions:

Policy NW7 has been amended and taken forward in the Submission Draft AAP and is considered to be sound.

Employment and University Uses

Policy NW8: Employment Uses

Summary of Issues and Options consulted on:

2 employment uses options were consulted upon:

Option 12.1 - Employment development at North West Cambridge will be limited to teaching and research institutions of the University.

Option 12.2 - Employment development at North West Cambridge will include a mix of commercial research as well as teaching and research institution of the University.

Summary of results of Issues and Options Community Involvement:

Option 12.1:

1 objection	2 supports	1 comment
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- The Structure Plan identifies the site as a Strategic Employment Location.

Option 12.2:

4 objections	5 supports	
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- Inclusion of commercial uses would generate additional traffic and undermine the viability of mixed use developments elsewhere;
- Numerous alternative sites exist for commercial research and development.

New Options Arising Following Issues and Options Community Involvement:

Not applicable.

Summary of Initial Sustainability Appraisal of Issues and Options:

Option 12.2 performs better in economic terms relative to option 12.1. It should be considered, however, that in balancing the use of Greenfield land with development, that the most efficient use of the land is chosen and a decision must be made whether this includes further development of the flagship sector. Option 12.1 will not increase demand for additional housing to the extent of option 12.2. Note that housing is a key issue in the area and the priority of the development.

Approach to Preferred Options:

The principle of limited further employment growth which includes a mix of commercial research in addition to University teaching and research buildings

would be acceptable. The linking of academic University buildings and commercial research buildings has the benefit of encouraging working relationships between academic research and the commercial sector, benefiting the higher education cluster and Cambridge's economy.

Any Changes resulting from Draft Final Sustainability Report:

- *Sustainability Appraisal Recommendation:*

None proposed.

Summary of Preferred Option:

Option 12.2 has been taken forward in preferred option NW8 as it encourages better working relationships between the University of Cambridge and commercial research, benefiting the higher education cluster.

Summary of Results of Preferred Options Community Involvement:

Policy NW8:

2 objections	2 supports
--------------	------------

- Support for the preferred option as worded;
- Objection to the inclusion of commercial uses; and
- Objection to the 10 year limit on occupancy conditions as inadequate.

Alternative Options Resulting from Preferred Options Consultation:

Not applicable.

Response:

Planning Policy Guidance Note 4 states that development plans must take account the needs of industry and commerce while at the same time wider objectives in the public interest. These needs include links with other businesses.

One of the reasons for the successful local economy in Cambridge is the close relationships between business and the University. Allowing commercial research to operate alongside the University, providing they firms can demonstrate a special need for this location, will help the economy of Cambridge.

Draft Planning Policy Statement 4, which will replace Planning Policy Guidance Note 4 in due course also refers to the need to "Recognise, and positively plan for, the benefits that can accrue when certain types of businesses locate within proximity of each other or with other compatible land uses such as universities and hospitals".

It is appropriate to include commercial uses at North West Cambridge.

Planning Policy Guidance Note 4 paragraph 29 states that occupancy conditions should be imposed only in special circumstances and only for "a short period (no more than 10 years)". Circular 11/95 also has 10 years as being a suitable maximum period for an occupancy condition. This is to ensure that fair competition is not unduly hindered by the planning process and industry is able to respond to economic demand.

This period of time is accepted practice in the Cambridge area for applying occupancy conditions on employment developments, and to extend it only on this site would not be justified.

The 10 year limit on occupancy conditions is reasonable and adequate.

Any Changes Resulting from the Final Sustainability Appraisal:

None proposed.

Tests of Soundness:

Procedural:

- (i) In accordance with Local Development Scheme
- (ii) Compliance with Statement of Community Involvement*
- (iii) Subjected to Sustainability Appraisal

Conformity:

- (iv) with national planning policy and Regional Spatial Strategy
- (v) regard to the Community Strategies**

Coherence, consistency and effectiveness:

- (vi) Policies are coherent and consistent
- (vii) Policies are most appropriate in all circumstances, are founded on a robust and credible evidence base, and relevant alternatives were considered
- (viii) Clear mechanisms for implementation and monitoring
- (ix) Plan is flexible to deal with changing circumstances

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** As a joint plan, it should have regard to the Community Strategies of both Councils

Conclusions:

Policy NW8 has been taken forward in the Submission Draft AAP and is considered to be sound.

Employment and University Uses

Policy NW9: Employment Uses in the Local Centre

Summary of Issues and Options consulted on:

It was considered that there were no options for the subject of consultation at the Issues & Options stage.

Summary of results of Issues and Options Community Involvement:

- Not applicable.

New Options Arising Following Issues and Options Community Involvement:

Not applicable.

Summary of Initial Sustainability Appraisal of Issues and Options:

Not applicable.

Approach to Preferred Options:

While the main employment uses on the site will be for D1 educational uses and research that is associated with the University, it will also be appropriate to have small scale employment uses as a part of the local centre. This small-scale employment will help provide job opportunities for local residents, as well as increasing the vitality and viability of the local centre, by increasing pedestrian activity throughout the day and the number of people that will use local shops.

The floorspace of 300m² has been chosen as below this limit the Councils would not normally seek to impose occupancy conditions on new employment development in line with the policy of selective management of the economy. Therefore if new employment developments at North West Cambridge within the local centre do not exceed this limit, they will not compromise the policy of discriminating in favour of uses that need to be within Cambridge.

Any Changes resulting from Draft Final Sustainability Report:

- *Sustainability Appraisal Recommendation*

Local employees accessing their place of work by sustainable means of transport is of strategic importance.

- *Councils' Response:*

Noted. Policy unchanged.

Summary of Preferred Option:

Policy NW9 has been taken forward as the preferred option as small scale employment development will be appropriate in the local centre.

Summary of Results of Preferred Options Community Involvement:

Policy NW9:

0 objections	0 supports
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- Not applicable.

Alternative Options Resulting from Preferred Options Consultation:

Not applicable.

Response:

Not applicable.

Any Changes Resulting from the Final Sustainability Appraisal:

None proposed.

Tests of Soundness:

Procedural:

- (i) In accordance with Local Development Scheme
- (ii) Compliance with Statement of Community Involvement*
- (iii) Subjected to Sustainability Appraisal

Conformity:

- (iv) with national planning policy and Regional Spatial Strategy
- (v) regard to the Community Strategies**

Coherence, consistency and effectiveness:

- (vi) Policies are coherent and consistent
- (vii) Policies are most appropriate in all circumstances, are founded on a robust and credible evidence base, and relevant alternatives were considered
- (viii) Clear mechanisms for implementation and monitoring
- (ix) Plan is flexible to deal with changing circumstances

*The document has been prepared in accordance with Cambridge City Council's adopted SCI and the minimum regulations set out in The Town and Country Planning (Local Development) (England) Regulations 2004.

** As a joint plan, it should have regard to the Community Strategies of both Councils

Conclusions:

Policy NW8 has been taken forward in the Submission Draft AAP and is considered to be sound.

Employment and University Uses

Policy NW10: Mix of Uses

Summary of Issues and Options consulted on:

It was considered that there were no options for the subject of consultation at the Issues & Options stage.

Summary of results of Issues and Options Community Involvement:

- Not applicable.

New Options Arising Following Issues and Options Community Involvement:

Not applicable.

Summary of Initial Sustainability Appraisal of Issues and Options:

Not applicable.

Approach to Preferred Options:

It was felt appropriate to limit the amount of commercial and sui generis research institutes that would be developed at North West Cambridge given the considerable commitments to these uses around Cambridge at this time and the availability and take up of land in the University's ownership.

Policy 9/7 of the Cambridge City Local Plan 2006 provides a split for the employment uses at North West Cambridge that will be developed within the City boundary. This split is for up to 14ha to be developed for higher education and up to 6ha for University related research institutes and commercial research uses, i.e. a split of 70% higher education uses and 30% research uses. As this split has already been determined through the inquiry into the Cambridge City Local Plan and in the absence of any further evidence from the University it was felt that the most appropriate way of determining the division for the whole site was to extend this seventy-thirty split to the full 100,000m².

The policy is written such that there is no requirement to make this split obvious on the ground. Indeed the embedding of research institutes within the wider University uses is to be welcomed as this can encourage cross-fertilisation of ideas and better working relationships between different firms and the University benefiting the higher education cluster in Cambridge.

Any Changes resulting from Draft Final Sustainability Report:

- *Sustainability Appraisal Recommendation:*

None proposed.

Summary of Preferred Option:

Policy NW10 has been taken forward as the preferred option as it carries forward the split for commercial and academic uses agreed in the Cambridge City Local Plan, while still allowing flexibility as to where these uses are located.

Summary of Results of Preferred Options Community Involvement:

Policy NW10:

6 objections	1 support
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- The term collegiate provision should be omitted from this option;
- The policy seems to be at odds with the assumptions on floorspace included in the transport study; and
- The split between academic uses and research is arbitrary, greater flexibility should be allowed in order to take full advantage of opportunities when they arise.

Alternative Options Resulting from Preferred Options Consultation:

Employment development at North West Cambridge will constitute:

- Up to 60,000 m² of higher education uses, including academic faculty development and a University Conference Centre, within Use Class D1; and*
- Up to 40,000m² of University related sui generis research institutes and commercial research uses within Use Class B1(b)*

Response:

The inclusion of the term “collegiate provision” makes the option as worded, unclear and confusing, it should be removed from the option for clarity.

The Cambridge North West Transport Strategy tests a "worst case scenario" where there is a 50:50 split between academic and commercial uses. Commercial uses will generate a higher amount of traffic than academic uses.

The Preferred Options Report identified a 70:30 split (with up to 30% commercial) and it is being recommended that the next iteration of the Area Action Plan contains a 60:40 split (with up to 40% commercial). This split of uses will generate less traffic than the scenario tested in the Transport Study.

The Objectors concerns regarding the split of uses are noted but in order to plan positively for the future of the area more detail is needed on the likely mix of uses.

The policy approach will also help to ensure that employment development is focussed on meeting the University's needs. Particularly in the light of the Employment Land Review initial findings of plentiful supply of land for research and development in the Cambridge area. The mix will in turn will influence other factors such as parking and levels of traffic generation. This information has not been forthcoming from the objector and as a consequence the Councils have had to decide how they was going to address the issue in the absence of more detailed masterplanning.

Policy 9/2c of the Cambridgeshire Structure Plan indicates that the site should be reserved for predominantly University-related uses.

The Cambridge Local Plan 2006 added greater detail to this split, within the City boundary by apportioning land takes to higher education uses and student accommodation (14 ha) and research uses based on the University requirements at the time (6 ha). It was this ratio that was used to generate the 70:30 split for the 100,000 sq m sought by the University between academic uses and research uses in the North West Area Action Plan Preferred Option report.

However the 14 ha figure includes land for student housing. This makes the assumptions behind 70:30 split included in the Preferred Options report unreliable.

To recalculate the split of employment uses one must first estimate what land take the student housing would use.

To estimate the land take of the student housing some assumptions need to be made regarding the density of student development. The University of Cambridge assumes a density of 200-250 dph for undergraduate housing and 150-200 dph for postgraduate housing. (Source: Cambridge Local Plan Inquiry, Evidence on behalf of the Chancellor, Masters & Scholars of the University of Cambridge, Proof of Evidence No 2: Staff & Student Housing Needs, page 10, bullet point 6) Also, their net requirement of identified need for additional student accommodation to 2025 identifies the need for 931 undergraduate places and 1,303 postgraduate units. (Source: Cambridge Local Plan Inquiry, Evidence on behalf of the Chancellor, Masters & Scholars of the University of Cambridge, Proof of Evidence No 2: Staff & Student Housing Needs, page 12, table 5) This equates to 42% undergraduates and 58% postgraduates.

Applying these figures to North West Cambridge, this gives 840 undergraduate units developed at 200-250 dph and 1160 postgraduate units at 150-200 dph. I.e. 9.16 ha - 11.93 ha.

Taking a mid-point between the two areas calculated gives 10.55 ha, then halving this figure gives 5.27 ha.

Assuming that about half of the student housing would be in each District, it follows that the land take for higher education uses included in policy 9.7 of the

Cambridge Local Plan 2006 minus the land assumed for student housing is: 14 - 5.27 = 8.73 ha.

This gives a division of 8.73 ha to 6 ha equating roughly to a 60:40 split.

In the absence of any more detailed evidence from the University this split will be used. It has been based upon figures which have gone through the inquiry process for the Cambridge Local Plan, which is an advantage. It also maintains predominantly University-related uses in the employment uses on the site whilst increasing flexibility in future provision.

The Employment Land Review commissioned by the Councils is indicating that there is a very generous supply of B1(b) land in Cambridge and South Cambridgeshire in relation to demand to 2021 and beyond. As such there is not a great need for large new allocations of B1(b) land in the Cambridge area.

Any Changes Resulting from the Final Sustainability Appraisal:

None proposed.

Tests of Soundness:

Procedural:

- (i) In accordance with Local Development Scheme
- (ii) Compliance with Statement of Community Involvement*
- (iii) Subjected to Sustainability Appraisal

Conformity:

- (iv) with national planning policy and Regional Spatial Strategy
- (v) regard to the Community Strategies**

Coherence, consistency and effectiveness:

- (vi) Policies are coherent and consistent
- (vii) Policies are most appropriate in all circumstances, are founded on a robust and credible evidence base, and relevant alternatives were considered
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- (ix) Plan is flexible to deal with changing circumstances

*The document has been prepared in accordance with Cambridge City Council's adopted SCI and the minimum regulations set out in The Town and Country Planning (Local Development) (England) Regulations 2004.

** As a joint plan, it should have regard to the Community Strategies of both Councils

Conclusions:

Policy NW10 has been amended and taken forward in the Submission Draft AAP and is considered to be sound.

Travel

Policy NW11: Sustainable Travel

Summary of Issues and Options consulted on:

It was considered that there were no options for the subject of consultation at the Issues & Options stage.

Summary of results of Issues and Options Community Involvement:

Although no related options were presented in the Issues & Options Report, the following issues were raised during the consultation process:

- The Council has a duty to support the provision of sustainable transport as a priority over the production of new road schemes
- Option 13.5 is not a sustainable approach to development

New Options Arising Following Issues and Options Community Involvement:

Not applicable.

Summary of Initial Sustainability Appraisal of Issues and Options:

Not applicable.

Approach to Preferred Options:

Providing for sustainable travel is an essential component of the AAP. This can be achieved by forms of development which minimise the need to travel and so are inherently sustainable. Mixed-use development is particularly important for allowing the daily needs of occupants to be met within walking or cycling distance.

Where travel is necessary, however, development will be planned to make this as sustainable as possible, particularly by maximising use of sustainable transport modes through the provision of safe and convenient routes and higher densities to encourage people to move about by foot, cycle and bus;

Transport modelling for North West Cambridge has shown that an 8 percent reduction in the mode share for journey by car (reducing the mode share from 45 percent to 37 percent) is achievable, if the right conditions are created as part of the development.

Any Changes resulting from Draft Final Sustainability Report:

- Sustainability Appraisal Recommendation

The Policy as it stands sets a high level of modal split. This should, dependant on implementation be set at a higher level and this should be considered with particular reference to the 37% modal split highlighted in the supporting text.

Car free should apply to the market housing and University buildings in addition to the 'essentially car free' University accommodation. This is recommended as the most sustainable option.

- Councils' Response

The modal split in the Area Action Plan is to allow for consistency with the Cambridge East Area Action Plan. Policy unchanged.

Noted, however a car free development in the out of centre location is not possible. Policy unchanged.

Summary of Preferred Option:

Policy NW11 has been taken forward as the preferred option as it requires development and transport systems to be planned in order to reduce the need to travel and maximise the use of sustainable transport modes to encourage people to move about by foot, cycle and bus, to achieve a modal split of no more than 40% of trips by car. This will include the provision of car clubs, employee travel plans, residential travel planning, and other similar measures.

Summary of Results of Preferred Options Community Involvement:

Policy NW11:

6 objections	4 supports
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- How the modal split will be monitored
- Should also cover recreational routes
- This policy will encourage more physical activity
- Concern about validity of transport modelling
- Transport plans for children and the elderly

Alternative Options Resulting from Preferred Options Consultation:

Not applicable

Response:

- Detailed monitoring work will be undertaken, with the modal split figures taken for journeys to work.
- Recreational routes are included more fully in policies NW17 and NW18.
- Policies to increase cycling and walking also increase levels of physical activity

- Transport modelling was carried out using the SATURN system which is approved by DfT and Highways Agency. More detailed modelling work will be done at outline planning permission stage.
- Residential, workplace and school travel plans will be required as part of the development.

Any Changes Resulting from the Final Sustainability Appraisal:

None proposed.

Tests of Soundness:

Procedural:

- (i) In accordance with Local Development Scheme
- (ii) Compliance with Statement of Community Involvement*
- (iii) Subjected to Sustainability Appraisal

Conformity:

- (iv) with national planning policy and Regional Spatial Strategy
- (v) regard to the Community Strategies**

Coherence, consistency and effectiveness:

- (vi) Policies are coherent and consistent
- (vii) Policies are most appropriate in all circumstances, are founded on a robust and credible evidence base, and relevant alternatives were considered
- (viii) Clear mechanisms for implementation and monitoring
- (ix) Plan is flexible to deal with changing circumstances

*The document has been prepared in accordance with Cambridge City Council's adopted SCI and the minimum regulations set out in The Town and Country Planning (Local Development) (England) Regulations 2004.

** As a joint plan, it should have regard to the Community Strategies of both Councils

Conclusions:

Policy NW11 has been taken forward in the Submission Draft AAP and is considered to be sound.

Travel

Policy NW12: Highway Infrastructure

Summary of Issues and Options consulted on:

2 highway infrastructure options consulted upon:

- Option 13.5 – New road links to and from the north (M11/A14) to Madingley Road will be provided. Such links would help to minimise traffic impacts from development by allowing more traffic to use Madingley Road as an alternative to Huntingdon Road
- Option 13.6 – That such new road links should not be provided as part of the development.

Summary of results of Issues and Options Community Involvement:

Option 13.5:

8 objections	8 support	1 comment
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- This would further exacerbate traffic problems;
- This is not a sustainable approach to development;
- There has never been any technical evidence to support this scheme;
- Draft Transport Strategy shows the potential benefits of this scheme are negligible when compared to provision of an orbital link;
- The need for such a scheme has not been demonstrated;
- There are no plans to provide such slip roads;
- The Council has a duty to support the provision of sustainable transport as a priority over the production of new road schemes

Option 13.6:

1 objection	5 support	1 comment
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- This would not enhance travel links from the South Cambridge area and Cambourne in particular

New Options Arising Following Issues and Options Community Involvement:

Not applicable.

Summary of Initial Sustainability Appraisal of Issues and Options:

The environmental impact of option 13.5 is significant. Option 13.5 may increase accessibility to the area, but it also encourages car use and thereby undermines the promotion of public transport. Note that option 13.6 may result in increased

congestion in local area. The cumulative environmental and social impacts of option 13.5 will have an adverse impact on local residents due to loss of open space, noise and air pollution.

Approach to Preferred Options:

North facing slip roads at the M11/A1303 interchange have been considered because they would give an alternative route into Cambridge (via Madingley Road) for southbound traffic from the A14 and M11. However, there is insufficient evidence to justify that such slip roads, and they have not been supported by public consultation. As the North West Cambridge Transport Study also shows negligible benefits, the recommended approach is that the option of north facing slip roads should not be included as a preferred option.

Any Changes resulting from Draft Final Sustainability Report:

- *Sustainability Appraisal Recommendation*

Traffic assessments may be necessary as part of the development proposal must include consideration of whether the scheme could induce new traffic movements.

- *Councils' Response*

Noted, this will be covered in the transport assessment. Policy unchanged.

Summary of Preferred Option:

Option 13.6 has been taken forward in preferred option NW12, including a requirement that development to be subject to sufficient highway capacity being available to serve all stages of development, including on the adjacent strategic road network. Development will contribute to measures to mitigate any significant adverse traffic impacts on the M11, A14 and the surrounding highway network, if this is shown to be necessary by transport assessments.

Summary of Results of Preferred Options Community Involvement:

Policy NW12:

4 objections	3 supports
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- How 'sufficient' highway is measured
- Mitigation measures
- Network highway capacity

Alternative Options Resulting from Preferred Options Consultation:

Not applicable

Response:

- Traffic modelling was based on the SATURN model approved by both the DfT and the Highways Agency. This and future models will determine the availability of sufficient highway capacity.
- Measures to mitigate noise and air pollution are not within the studies scope and will be examined in more detail at the masterplanning/outline planning permission stage.

Any Changes Resulting from the Final Sustainability Appraisal:

None proposed.

Tests of Soundness:

Procedural:

- (i) In accordance with Local Development Scheme
- (ii) Compliance with Statement of Community Involvement*
- (iii) Subjected to Sustainability Appraisal

Conformity:

- (iv) with national planning policy and Regional Spatial Strategy
- (v) regard to the Community Strategies**

Coherence, consistency and effectiveness:

- (vi) Policies are coherent and consistent
- (vii) Policies are most appropriate in all circumstances, are founded on a robust and credible evidence base, and relevant alternatives were considered
- (viii) Clear mechanisms for implementation and monitoring
- (ix) Plan is flexible to deal with changing circumstances

*The document has been prepared in accordance with Cambridge City Council's adopted SCI and the minimum regulations set out in The Town and Country Planning (Local Development) (England) Regulations 2004.

** As a joint plan, it should have regard to the Community Strategies of both Councils

Conclusions:

Policy NW12 has been taken forward in the Submission Draft AAP and is considered to be sound.

Travel

Policy NW13: Vehicular Access

Summary of Issues and Options consulted on:

It was considered that there were no options for the subject of consultation at the Issues & Options stage.

Summary of results of Issues and Options Community Involvement:

Not applicable.

New Options Arising Following Issues and Options Community Involvement:

Not applicable.

Summary of Initial Sustainability Appraisal of Issues and Options:

Not applicable.

Approach to Preferred Options:

In order to limit the impact upon the key radial corridors of Huntingdon Road and Madingley Road and to exclude the possibility of an access for general traffic from Storeys Way, there should be a limited number of vehicular accesses to the development area. A maximum of two accesses from Huntingdon Road and one from Madingley Road are thus proposed for general traffic.

Any Changes resulting from Draft Final Sustainability Report:

- Sustainability Appraisal Recommendation

It will be at the detail level that it will be possible to gauge the true level and type of impact on landscape character, and furthermore to ascertain the impacts of light, noise and air pollution. Therefore any application should consider Landscape Impacts as part of its scope

- Councils' Response

Noted, policy NW2 covers such general principles. Policy unchanged.

Summary of Preferred Option:

Policy NW13 has been taken forward as the preferred option as it requires vehicular access to the development area to be from Huntingdon Road and Madingley Road. The number of vehicular access points to the development area

will be minimised, especially from Huntingdon Road, and there will be no access for private motor vehicles to and from Storey's Way.

Summary of Results of Preferred Options NW13 Community Involvement:

Policy NW13:

3 objections	1 supports
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- Cumulative effect of traffic from other developments has not been assessed
- Vehicular access points should be minimised
- All residents should have access to sustainable travel modes
- No regular vehicle access through University Farm Road

Alternative Options Resulting from Preferred Options Consultation:

Not applicable

Response:

- The North West Transport Study looked at traffic from both this development and the neighbouring NIAB development.
- Agree that vehicle access points should be minimised, although their exact location will be set during the masterplanning/outline planning permission stages.
- Sustainable travel modes are promoted in options NW16, NW17 and NW18 and should be prioritised.

Any Changes Resulting from the Final Sustainability Appraisal:

None proposed.

Tests of Soundness:

Procedural:

- ✓ (i) In accordance with Local Development Scheme
- ✓ (ii) Compliance with Statement of Community Involvement*
- ✓ (iii) Subjected to Sustainability Appraisal

Conformity:

- ✓ (iv) with national planning policy and Regional Spatial Strategy
- ✓ (v) regard to the Community Strategies**

Coherence, consistency and effectiveness:

- ✓ (vi) Policies are coherent and consistent

- (vii) Policies are most appropriate in all circumstances,
 are founded on a robust and credible evidence base, and relevant alternatives were considered
- (viii) Clear mechanisms for implementation and monitoring
- (ix) Plan is flexible to deal with changing circumstances

*The document has been prepared in accordance with Cambridge City Council's adopted SCI and the minimum regulations set out in The Town and Country Planning (Local Development) (England) Regulations 2004.

** As a joint plan, it should have regard to the Community Strategies of both Councils

Conclusions:

Policy NW13 has been taken forward in the Submission Draft AAP and is considered to be sound.

Travel

Policy NW14: Madingley Road to Huntingdon Road Link

Summary of Issues and Options consulted on:

4 orbital route options were consulted on:

- Option 13.1 – A new all purpose route will be developed linking Madingley Road and Huntingdon Road. The route will lie within a green corridor within the University's development.
- Option 13.2 – A new all purpose route will be developed linking Madingley Road and Huntingdon Road. This road will be designed within and as part of the developments with regard to slower speeds and safe crossings for pedestrians.
- Option 13.3 – A new orbital route limited to cyclists and public transport will be developed linking Madingley Road and Huntingdon Road.
- Option 13.4 – A new orbital route limited to cyclists and public transport will be developed linking Madingley Road and Huntingdon Road. This road will be designed within and as part of the developments with regard to slower speeds and safe crossings for pedestrians

Summary of results of Issues and Options Community Involvement:

Option 13.1:

8 objections	1 support	1 comment
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- This would encourage people to travel by car & is not supported;
- There should be no increase in general road capacity;
- Should be restricted to cycling & public transport;
- Would spoil the green corridor;
- Contrary to the approach being advocated on the NIAB site;
- Route needs to be of urban form if it is to function properly;
- Will have an uncertain impact on the transport network in the NW quadrant

Option 13.2:

3 objections	7 support	2 comment
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- There should be no increase in general road capacity;
- Will have an uncertain impact on the transport network in the NW quadrant

Option 13.3:

4 objections	3 support	2 comment
--------------	-----------	-----------

- Failure to provide road capacity does not encourage use of other modes of transport by those for whom it is impractical;
- Slower speeds & safe crossings are required for pedestrians & cyclists;
- Cycling should be given high priority with road crossings;
- Draft Transport Strategy shows there is not high demand for orbital movements and new roads should be designed to serve the development while discouraging their use as an orbital route;
- Draft Strategy also highlights the need for direct walking, cycling and public transport links;
- Draft Transport Strategy concludes orbital link should cater for all modes of transport, although will need to mitigate the desire for rat-running;
- Preferred option must be based on an assessment of the evidence & input from key stakeholders

Option 13.4:

3 objections	10 support	0 comment
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- Failure to provide road capacity does not encourage use of other modes of transport by those for whom it is impractical;
- This denies the benefits to other drivers of reducing congestion in the City;
- Draft Transport Strategy concludes orbital link should cater for all modes of transport, although will need to mitigate the desire for rat-running

New Options Arising Following Issues and Options Community Involvement:

Not applicable.

Summary of Initial Sustainability Appraisal of Issues and Options:

Option 13.4 performs best across all objectives. Options 13.2 and 13.3 balance the use of undeveloped green corridor space and the promotion of public transport. 13.1 is the least sustainable option Options 13.1 and 13.3 will have cumulative environmental and social impacts, these will be due to loss of open space, noise and air pollution. The most significant cumulative impact will be on local residents living in proximity to the orbital route.

Approach to Preferred Options:

A new road is proposed as part of the development of North West Cambridge. This route is intended to primarily provide access for the proposed development. Nevertheless, its development will only be possible if its impacts on the transport network and on amenity are acceptable. The design will provide for cycling and public transport, in order to encourage movements by more sustainable modes. Any new road will need to be designed not to impact on the purposes and amenity of the strategic gap within the development area.

4 options (13.1 to 13.4) for an orbital route were included in consultation. Although Option 13.4 received the largest number of supporting responses, the preferred option emerging from the North West Cambridge Transport Study was Option 13.2, which also had a majority of supporting responses. The recommended approach is thus to take forward Option 13.2, but in such a way that priority is given to walking, cycling and public transport and to a design based on low vehicle speeds.

Any Changes resulting from Draft Final Sustainability Report:

- *Sustainability Appraisal Recommendation:*

None proposed.

Summary of Preferred Option:

Option 13.2 has been taken forward in preferred option NW14 including a policy which proposes a new all purpose route linking Madingley Road and Huntingdon Road. This road will be designed as part of the development and its design will be based on low vehicle speeds. It will give priority to provision for walking, cycling and public transport, including safe and convenient crossings for pedestrians and cyclists, in order to encourage travel by more sustainable modes.

Summary of Results of Preferred Options Community Involvement:

Policy NW14:

9 objections	1 supports
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- Support link road
- Roads should not be built through the 'green gap'
- Will encourage more car journeys
- Measures to prioritise walking and cycling on this road must be made
- Concern over impact on the historic environment
- A proper through road should be created to ease the pressure on Huntingdon Road.

Alternative Options Resulting from Preferred Options Consultation:

Not applicable.

Response:

- The link road will primarily be for access to the site but it will also offer an alternative access to the strategic road network.
- A road will only be possible if impacts on amenities including green gap and the historic environment are acceptable.

- The design of new roads should give priority to public transport, pedestrians and cyclists.

Any Changes Resulting from the Final Sustainability Appraisal:

None proposed.

Tests of Soundness:

Procedural:

- (i) In accordance with Local Development Scheme
- (ii) Compliance with Statement of Community Involvement*
- (iii) Subjected to Sustainability Appraisal

Conformity:

- (iv) with national planning policy and Regional Spatial Strategy
- (v) regard to the Community Strategies**

Coherence, consistency and effectiveness:

- (vi) Policies are coherent and consistent
- (vii) Policies are most appropriate in all circumstances, are founded on a robust and credible evidence base, and relevant alternatives were considered
- (viii) Clear mechanisms for implementation and monitoring
- (ix) Plan is flexible to deal with changing circumstances

*The document has been prepared in accordance with Cambridge City Council's adopted SCI and the minimum regulations set out in The Town and Country Planning (Local Development) (England) Regulations 2004.

** As a joint plan, it should have regard to the Community Strategies of both Councils

Conclusions:

Policy NW14 has been taken forward in the Submission Draft AAP and is considered to be sound.

Travel

Policy NW15: Highway Provision

Summary of Issues and Options consulted on:

It was considered that there were no options for the subject of consultation at the Issues & Options stage.

Summary of results of Issues and Options Community Involvement:

Although no related options were presented in the Issues & Options Report, the following issues were raised during the consultation process:

- There should be no increase in general road capacity
- Failure to provide road capacity does not encourage use of other modes of transport by those for whom it is impractical

New Options Arising Following Issues and Options Community Involvement:

Not applicable.

Summary of Initial Sustainability Appraisal of Issues and Options:

Not applicable.

Approach to Preferred Options:

The overall approach to transport is to provide for the necessary vehicular trips associated with the development whilst managing the need to travel by car and promoting the use of other sustainable modes of travel. There is thus a preference for solutions to travel demand which do not require the provision of new strategic road capacity. However, development needs to be delivered in such a way that it minimises any additional burden on other users of the strategic road network. Thus, if transport assessments indicate adverse impacts from development on the strategic road network (despite the use of all possible demand management measures) then development will need to contribute to appropriate mitigation measures on the strategic road network which are necessary to cater safely and efficiently for anticipated traffic levels.

Such measures will need to be in place prior to first occupation of each phase of development.

Any Changes resulting from Draft Final Sustainability Report:

- *Sustainability Appraisal Recommendation:*

None proposed.

Summary of Preferred Option:

Policy NW15 has been taken forward as the preferred option as it requires highway provision to be funded by development, as appropriate, and key links to be in place prior to first occupation of each phase of development.

Summary of Results of Preferred Options Community Involvement:

Policy NW15:

2 objections	1 supports
--------------	------------

- Major offsite infrastructure cannot be funded from this development alone
- Amenity of existing residents should be preserved.
- Sufficient transport assessment should be made at this time

Alternative Options Resulting from Preferred Options Consultation:

Not applicable.

Response:

- The level of infrastructure funding will be determined by the outcome of a transport assessment.
- Foot and cycle path locations will be developed at master planning/outline planning permission stage and will wherever possible protect the amenity of existing houses.
- More detailed transport assessments will be made as part of the master planning/outline planning permission stage.

Any Changes Resulting from the Final Sustainability Appraisal:

None proposed.

Tests of Soundness:

Procedural:

- (i) In accordance with Local Development Scheme
- (ii) Compliance with Statement of Community Involvement*
- (iii) Subjected to Sustainability Appraisal

Conformity:

- (iv) with national planning policy and Regional Spatial Strategy
- (v) regard to the Community Strategies**

Coherence, consistency and effectiveness:

- (vi) Policies are coherent and consistent
- (vii) Policies are most appropriate in all circumstances, are founded on a robust and credible evidence base, and relevant alternatives were considered
- (viii) Clear mechanisms for implementation and monitoring
- (ix) Plan is flexible to deal with changing circumstances

*The document has been prepared in accordance with Cambridge City Council's adopted SCI and the minimum regulations set out in The Town and Country Planning (Local Development) (England) Regulations 2004.

** As a joint plan, it should have regard to the Community Strategies of both Councils

Conclusions:

Policy NW15 has been taken forward in the Submission Draft AAP and is considered to be sound.

Travel

Policy NW16: Public Transport Provision

Summary of Issues and Options consulted on:

4 public transport options were consulted upon:

- Option 13.1 – A new all purpose route will be developed linking Madingley Road and Huntingdon Road. The route will lie within a green corridor within the University's development.
- Option 13.2 – A new all purpose route will be developed linking Madingley Road and Huntingdon Road. This road will be designed within and as part of the developments with regard to slower speeds and safe crossings for pedestrians.
- Option 13.3 – A new orbital route limited to cyclists and public transport will be developed linking Madingley Road and Huntingdon Road.
- Option 13.4 – A new orbital route limited to cyclists and public transport will be developed linking Madingley Road and Huntingdon Road. This road will be designed within and as part of the developments with regard to slower speeds and safe crossings for pedestrians

Summary of results of Issues and Options Community Involvement:

Option 13.1:

8 objections	1 support	1 comment
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- This would encourage people to travel by car & is not supported;
- There should be no increase in general road capacity;
- Should be restricted to cycling & public transport;
- Would spoil the green corridor;
- Contrary to the approach being advocated on the NIAB site;
- Route needs to be of urban form if it is to function properly;
- Will have an uncertain impact on the transport network in the NW quadrant

Option 13.2:

3 objections	7 support	2 comment
--------------	-----------	-----------

- There should be no increase in general road capacity;
- Will have an uncertain impact on the transport network in the NW quadrant

Option 13.3:

4 objections	3 support	2 comment
--------------	-----------	-----------

- Failure to provide road capacity does not encourage use of other modes of transport by those for whom it is impractical;
- Slower speeds & safe crossings are required for pedestrians & cyclists;
- Cycling should be given high priority with road crossings;
- Draft Transport Strategy shows there is not high demand for orbital movements and new roads should be designed to serve the development while discouraging their use as an orbital route;
- Draft Strategy also highlights the need for direct walking, cycling and public transport links;
- Draft Transport Strategy concludes orbital link should cater for all modes of transport, although will need to mitigate the desire for rat-running;
- Preferred option must be based on an assessment of the evidence & input from key stakeholders

Option 13.4:

3 objections	10 support	0 comment
--------------	------------	-----------

- Failure to provide road capacity does not encourage use of other modes of transport by those for whom it is impractical;
- This denies the benefits to other drivers of reducing congestion in the City;
- Draft Transport Strategy concludes orbital link should cater for all modes of transport, although will need to mitigate the desire for rat-running

New Options Arising Following Issues and Options Community Involvement:

Not applicable.

Summary of Initial Sustainability Appraisal of Issues and Options:

Option 13.4 performs best across all objectives. Options 13.2 and 13.3 balance the use of undeveloped green corridor space and the promotion of public transport. 13.1 is the least sustainable option. Options 13.1 and 13.3 will have cumulative environmental and social impacts, these will be due to loss of open space, noise and air pollution. The most significant cumulative impact will be on local residents living in proximity to the orbital route.

Approach to Preferred Options:

Providing high quality public transport is essential to achieving sustainable development in North West Cambridge and the proposed modal shift. Development will therefore be expected to encourage bus use as much as possible for trips to and from external destinations and for work journeys to the site. The development area has the advantage of being close to the existing bus route network, but needs to be well linked to them.

The proposed Madingley Road to Huntingdon Road link route through the development area, provides the option for buses to avoid the city centre and gives

more direct connections to other areas of the City. It will provide links with development north of Huntingdon Road and with the University's West Cambridge site to the south.

4 options (13.1 to 13.4) for an orbital route were included in consultation, although Option 13.4 (an orbital route limited to cyclists & public transport) received the largest number of supporting responses, the preferred option emerging from the North West Cambridge Transport Study was Option 13.2, which also had a majority of supporting responses. The recommended approach is thus to take forward Option 13.2.

Any Changes resulting from Draft Final Sustainability Report:

- *Sustainability Appraisal Recommendation:*

None proposed.

Summary of Preferred Option:

Option 13.2 has been taken forward in preferred option NW16 including a policy which requires High Quality Public Transport provision to be provided to support development, including:

- a) Providing segregated bus priority routes through the development, along internal routes;
- b) Linkage of bus routes within the development to the wider bus network, including enhanced bus services along Huntingdon Road and the proposed Madingley Road to Huntingdon Road link route;
- c) Provision of bus stops, shelters and real time passenger information, with the majority of development being within 400m easy walking distance of a bus stop; and
- d) Support for bus usage via residential travel plans and employee travel plans, funded by development.

Summary of Results of Preferred Options Community Involvement:

Policy NW16:

5 objections	3 supports
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- Effect of the TiF bid on proposals
- University will not make direct provision of public transport
- Needs of existing residents should be served by buses
- Routes shouldn't be provided through 'green gap'
- High Quality public transport should be defined

Alternative Options Resulting from Preferred Options Consultation:

Not applicable.

Response:

- There is currently no commitment by the County Council to take TiF forward.
- Clarification of wording to make clear that encouraging bus use would be part of a Residential Travel Plan
- Buses will be given priority over private vehicles on the routes around the site and will interchange with facilities in the City Centre.
- Impacts on existing amenity like green spaces should be minimised.
- There is a definition of High Quality Public Transport in the Glossary

Any Changes Resulting from the Final Sustainability Appraisal:

None proposed.

Tests of Soundness:

Procedural:

- (i) In accordance with Local Development Scheme
- (ii) Compliance with Statement of Community Involvement*
- (iii) Subjected to Sustainability Appraisal

Conformity:

- (iv) with national planning policy and Regional Spatial Strategy
- (v) regard to the Community Strategies**

Coherence, consistency and effectiveness:

- (vi) Policies are coherent and consistent
- (vii) Policies are most appropriate in all circumstances, are founded on a robust and credible evidence base, and relevant alternatives were considered
- (viii) Clear mechanisms for implementation and monitoring
- (ix) Plan is flexible to deal with changing circumstances

*The document has been prepared in accordance with Cambridge City Council's adopted SCI and the minimum regulations set out in The Town and Country Planning (Local Development) (England) Regulations 2004.

** As a joint plan, it should have regard to the Community Strategies of both Councils

Conclusions:

Policy NW16 has been taken forward in the Submission Draft AAP and is considered to be sound.

Travel

Policy NW17: Cycling Provision

Summary of Issues and Options consulted on:

One cycling provision option was consulted upon:

- Option 13.7 New and improved cycle links will be provided as part of the development

Summary of results of Issues and Options Community Involvement:

Option 13.7:

3 objections	8 support	2 comment
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- Should include reference to linking cycle routes to all road links to ensure sustainable development;
- Policy should state where the links are to (should explicitly state to Cambridge and all other large developments)
- All cycle routes should be designated cycle paths (not shared-use) and designed to the highest Sustrans/DfT standards;
- Needs to include reference to provision of secure and convenient residential cycle parking

New Options Arising Following Issues and Options Community Involvement:

Not applicable.

Summary of Initial Sustainability Appraisal of Issues and Options:

The inclusion of cycle links within the development area is considered to have sustainability advantages and this option is viewed as having economic and social benefits as well as environmental. Mitigation has been proposed in the form of undertakings within the plan to provide secure bicycle parking and to provide measures to design out crime from cycle routes. Indirect positive benefits on biodiversity have been noted. Reducing the potential emissions that the site may produce will have a reduced effect on biodiversity through better air quality, and will help protect the integrity of designated sites within the region.

Approach to Preferred Options:

The development needs to include excellent cycling routes and facilities to encourage short distance trips to be made by cycling and so reduce the dependence on private cars. Cycle facilities within the development also need to be linked to the wider cycle network.

Radial provision is needed to give cyclists spinal routes through the new development which link with existing routes, including to and from the City centre. This will give alternatives to existing cycle route along Huntingdon Road and Madingley Road (although existing routes may also be improved).

Orbital cycle routes are also needed, to connect with radial provision and with links north eastwards to Histon Road and beyond, as well as southwards to the Coton path, and University buildings. Safe and convenient cycle crossing facilities at Huntingdon Road and Madingley Road will be an essential part of the orbital provision. This will also give the potential to provide a more convenient cycle route to key destinations, including the proposed new rail station at Chesterton Sidings.

Pursue option 13.7

Any Changes resulting from Draft Final Sustainability Report:

- *Sustainability Appraisal Recommendation:*

None proposed.

Summary of Preferred Option:

Option 13.7 has been taken forward in preferred option NW17 including a policy which requires new and improved cycle links to be provided as part of the development, including:

- Giving priority to cycling links between Huntingdon Road and Madingley Road and to the City centre;
- Giving priority to cycling within the development, including connections to key destinations, including the local centre, bus stops, the primary school and employment; and
- Linking the development with the surrounding walking and cycling network and orbital routes including links to nearby villages and open countryside.

Summary of Results of Preferred Options Community Involvement:

Policy NW17:

4 objections	5 supports
--------------	------------

- Priority needed for cyclists
- Improvements needed to cycle facilities outside of the site
- New cycle routes will encourage sustainable transport

Alternative Options Resulting from Preferred Options Consultation:

Not applicable.

Response:

- Agree that it is important to provide high quality cycle routes, the design of which will be part of the masterplanning process.
- Support for off site measures to be negotiated through masterplanning and S106 process

Any Changes Resulting from the Final Sustainability Appraisal:

None proposed.

Tests of Soundness:

Procedural:

- (i) In accordance with Local Development Scheme
- (ii) Compliance with Statement of Community Involvement*
- (iii) Subjected to Sustainability Appraisal

Conformity:

- (iv) with national planning policy and Regional Spatial Strategy
- (v) regard to the Community Strategies**

Coherence, consistency and effectiveness:

- (vi) Policies are coherent and consistent
- (vii) Policies are most appropriate in all circumstances, are founded on a robust and credible evidence base, and relevant alternatives were considered
- (viii) Clear mechanisms for implementation and monitoring
- (ix) Plan is flexible to deal with changing circumstances

*The document has been prepared in accordance with Cambridge City Council's adopted SCI and the minimum regulations set out in The Town and Country Planning (Local Development) (England) Regulations 2004.

** As a joint plan, it should have regard to the Community Strategies of both Councils

Conclusions:

Policy NW17 has been taken forward in the Submission Draft AAP and is considered to be sound.

Travel

Policy NW18: Walking Provision

Summary of Issues and Options consulted on:

It was considered that there were no options for the subject of consultation at the Issues & Options stage.

Summary of results of Issues and Options Community Involvement:

Although no related options were presented in the Issues & Options Report, the following issues were raised during the consultation process:

- Slower speeds & safe crossings are required for pedestrians & cyclists;
- The draft transport strategy highlights the need for direct walking, cycling and public transport links

New Options Arising Following Issues and Options Community Involvement:

Not applicable.

Summary of Initial Sustainability Appraisal of Issues and Options:

Not applicable.

Approach to Preferred Options:

The development needs to include excellent walking routes to encourage short distance trips to be made by walking and so reduce the dependence on private cars. The majority of walking trips generated by the development will be internal to the development site, but opportunities also exist for walking trips to be made to key external destinations, including schools and colleges in the vicinity of the site.

Walking routes should be provided within the development sites to provide maximum permeability to destinations within the development, particularly local centres. The routes should connect to existing walking routes on Huntingdon Road and Madingley Road, via as many connections as possible. Where feasible these links should be in the form of separate footpath links and should include safe and convenient routes to bus stops.

Any Changes resulting from Draft Final Sustainability Report:

- *Sustainability Appraisal Recommendation:*

None proposed.

Summary of Preferred Option:

Policy NW18 has been taken forward as the preferred option as it requires development to be required to provide attractive, direct and safe walking routes as part of the development, including:

- Giving priority to walking links between Huntingdon Road and Madingley Road and to the City centre;
- Giving priority to walking routes within the development connecting to key destinations, including the local centre, bus stops, the primary school and employment; and
- Linking the development with the surrounding walking network, including links to an improved rights of way network and to nearby villages and open countryside.

Summary of Results of Preferred Options Community Involvement:

Policy NW18:

4 objections	4 supports
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- Home zones should be encouraged.
- Pedestrian routes will encourage sustainable transport use.
- Links across Huntingdon Road should be encouraged.
- Links to recreational routes should be included.
- Segregation of pedestrians and cyclists on footpaths should be emphasised.

Alternative Options Resulting from Preferred Options Consultation:

Not applicable.

Response:

- Home zones should be considered as part of the detailed master planning.
- Agree that walking links to a range of destinations including the new NIAB development should be encouraged.
- Off site walking links and detailed footpath/cycleway design will be part through the master planning process.

Any Changes Resulting from the Final Sustainability Appraisal:

None proposed.

Tests of Soundness:

Procedural:

- (i) In accordance with Local Development Scheme
- (ii) Compliance with Statement of Community Involvement*

- ☑ (iii) Subjected to Sustainability Appraisal
- Conformity:
- ☑ (iv) with national planning policy and Regional Spatial Strategy
- ☑ (v) regard to the Community Strategies**
- Coherence, consistency and effectiveness:
- ☑ (vi) Policies are coherent and consistent
- (vii) Policies are most appropriate in all circumstances,
- ☑ are founded on a robust and credible evidence base, and relevant alternatives were considered
- ☑ (viii) Clear mechanisms for implementation and monitoring
- ☑ (ix) Plan is flexible to deal with changing circumstances

*The document has been prepared in accordance with Cambridge City Council's adopted SCI and the minimum regulations set out in The Town and Country Planning (Local Development) (England) Regulations 2004.

** As a joint plan, it should have regard to the Community Strategies of both Councils

Conclusions:

Policy NW18 has been taken forward in the Submission Draft AAP and is considered to be sound.

Travel

Policy NW19: Parking Standards

Summary of Issues and Options consulted on:

It was considered that there were no options for the subject of consultation at the Issues & Options stage.

Summary of results of Issues and Options Community Involvement:

Although no related options were presented in the Issues & Options Report, the following issues were raised during the consultation process:

- Needs to include reference to provision of secure and convenient residential cycle parking

New Options Arising Following Issues and Options Community Involvement:

Not applicable.

Summary of Initial Sustainability Appraisal of Issues and Options:

Not applicable.

Approach to Preferred Options:

The amount of residential and employee car parking will have a significant effect upon levels of car use and needs to be minimised in order to make the car a less preferred option. In particular, student residential parking will be very low and subject to proctorial control. In order to reduce car parking demands and to make cycling a more attractive option, the amount of convenient cycle parking provided as part of development should be maximised.

The amount of car parking needs to be related to public transport accessibility and residential densities. Car parking should not be allowed to dominate design and measures such as car clubs should be explored to minimise the need for individual car ownership and the associated parking demands.

Any Changes resulting from Draft Final Sustainability Report:

- *Sustainability Appraisal Recommendation:*

The policy should be expanded to promote car free development for all of the land uses designated on the site. This is recommended as the most sustainable option.

- *Councils' Response:*

Noted, however a car free development in the out of centre location is not possible. Policy unchanged.

Summary of Preferred Option:

Policy NW19 has been taken forward as the preferred option as it requires car and cycle parking to be provided in accordance with specified standards. In applying these standards, the overall aim will be to minimise the amount of car parking and to maximise the amount of cycle parking in order to encourage the use of more sustainable modes.

Summary of Results of Preferred Options Community Involvement:

Policy NW19:

5 objections	0 supports
--------------	------------

- How will visitor parking and parking for home delivery vehicles be accommodated
- What are the standards for commercial research and research institutes on the site
- Policy should have regard to PPG13 and PPS3
- Car parking should be in bays

Alternative Options Resulting from Preferred Options Consultation:

Not applicable.

Response:

- Car parking standards will be in line with those in Appendix 1
- Car Parking standards are in line with PPG13 and PPS3 and are considered appropriate to achieve the aim of reducing car dependency
- Agree that car parking should be in marked bays

Any Changes Resulting from the Final Sustainability Appraisal:

None proposed.

Tests of Soundness:

Procedural:

- (i) In accordance with Local Development Scheme
- (ii) Compliance with Statement of Community Involvement*
- (iii) Subjected to Sustainability Appraisal

Conformity:

- ✓ (iv) with national planning policy and Regional Spatial Strategy
- ✓ (v) regard to the Community Strategies**

Coherence, consistency and effectiveness:

- ✓ (vi) Policies are coherent and consistent
- ✓ (vii) Policies are most appropriate in all circumstances, are founded on a robust and credible evidence base, and relevant alternatives were considered
- ✓ (viii) Clear mechanisms for implementation and monitoring
- ✓ (ix) Plan is flexible to deal with changing circumstances

*The document has been prepared in accordance with Cambridge City Council's adopted SCI and the minimum regulations set out in The Town and Country Planning (Local Development) (England) Regulations 2004.

** As a joint plan, it should have regard to the Community Strategies of both Councils

Conclusions:

Policy NW19 has been taken forward in the Submission Draft AAP and is considered to be sound.

Community Services and Facilities

Policy NW20: Provision of Community Services and Facilities, Arts and Culture

Summary of Issues and Options consulted on:

It was considered that there were no options for the subject of consultation at the Issues & Options stage.

Summary of results of Issues and Options Community Involvement:

Not applicable.

New Options Arising Following Issues and Options Community Involvement:

Not applicable.

Summary of Initial Sustainability Appraisal of Issues and Options:

Not applicable.

Approach to Preferred Options:

In accordance with national planning policy in PPS1 which seeks to create sustainable communities, the development of North West Cambridge will require an appropriate level of services and facilities to be provided within the development to serve the needs of the community, including those who will come to live, work and study within its area. It is important that these services and facilities are provided at an early stage in the development to ensure that the new community has the opportunity to be sustainable by using local services rather than travelling to use those provided outside its area.

The appropriate type and level of services and facilities will need to be determined in advance of the granting of any planning permission through detailed assessments prepared in collaboration with key stakeholders, which will include an assessment of needs, leading to strategies identifying the requirements and the phasing of their delivery which will be incorporated into planning obligations. As the development will take place over a long period of time it is important that adequate provision is made at all stages.

Any Changes resulting from Draft Final Sustainability Report:

- *Sustainability Appraisal Recommendation:*

Part 1 of the policy has no mention of ensuring high quality services and facilities. Suggest rewording thus:

“The development will provide an appropriate high quality level and type of services and facilities in suitable locations ...”

Part 2 of the Policy should be reworded to make clearer what it is hoping to achieve. Suggest the addition of an e.g.:

“Where appropriate, those services and facilities delivered by the community or voluntary sector (e.g. faith facilities) will be provided through...”

- *Councils' Response:*

Agree in principle. Policy altered although recommended wording not used.

Summary of Preferred Option:

Policy NW20 has been taken forward as the preferred option in order to implement the vision (NW1), which requires a local centre to act as a focus for the development and also provide facilities and services for nearby communities.

Summary of Results of Preferred Options Community Involvement:

Policy NW20:

2 objections	2 supports
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- The policy should clarify whether sports facilities are included within this policy; and
- The policy should mention on-site healthcare provision;

Alternative Options Resulting from Preferred Options Consultation:

Not applicable

Response:

- The reference to sporting clubs in part 2 of policy NW 20 relates to any such facilities provided over and above that required by the Open Space and Recreation standards. Insert a new supporting paragraph to policy NW20, clarifying this, to read: “Not all services and facilities will be provided by the public or commercial sectors. Some facilities at North West Cambridge will be best provided through the direct involvement of community groups, e.g. facilities for faith and public worship and associations including social and sporting clubs. In appropriate instances the development may be required to provide land for their provision. These would be any sporting club that provides facilities over and above that required by the Open Space and Recreation Standards”.
- Amend paragraph 7.9 to include reference to provision of healthcare.

Any Changes Resulting from the Final Sustainability Appraisal:

None proposed.

Tests of Soundness:

Procedural:

- (i) In accordance with Local Development Scheme
- (ii) Compliance with Statement of Community Involvement*
- (iii) Subjected to Sustainability Appraisal

Conformity:

- (iv) with national planning policy and Regional Spatial Strategy
- (v) regard to the Community Strategies**

Coherence, consistency and effectiveness:

- (vi) Policies are coherent and consistent
- (vii) Policies are most appropriate in all circumstances, are founded on a robust and credible evidence base, and relevant alternatives were considered
- (viii) Clear mechanisms for implementation and monitoring
- (ix) Plan is flexible to deal with changing circumstances

*The document has been prepared in accordance with Cambridge City Council's adopted SCI and the minimum regulations set out in The Town and Country Planning (Local Development) (England) Regulations 2004.

** As a joint plan, it should have regard to the Community Strategies of both Councils

Conclusions:

Policy NW20 has been amended and taken forward in the Submission Draft AAP and is considered to be sound.

Community Services and Facilities

Policy NW21: A Local Centre

Summary of Issues and Options consulted on:

Two locations for the local centre options were consulted on:

- Option 14.1 – A local centre will be established, close to the heart of the new development.
- Option 14.2 – A local centre will be established close to the heart of the new development, with some community services and facilities to be located close to Huntingdon Road.

Summary of results of Issues and Options Community Involvement:

Option 14.1:

3 objections	2 supports	1 comment
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- Difficult to form a view about the function & makeup of local centre without information on the ultimate size and mix of land uses;
- Provision is required for new residents of both sites in the area and also for existing residents in areas neighbouring both sites;
- Could increase the need to travel for the wider community.

Option 14.2:

2 objections	6 supports	3 comments
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- Must be planned in conjunction with NIAB site;
- Locating facilities on Huntingdon Road would make them more difficult to access from the West Cambridge site;
- Masterplanning for the NIAB site does not provide for establishing community facilities on the northern side of Huntingdon Road;
- Difficult to form a view about the function & makeup of local centre without information on the ultimate size and mix of land uses;
- Could have implications for the viability of both the local centre & outlying facilities.

New Options Arising Following Issues and Options Community Involvement:

Not applicable.

Summary of Initial Sustainability Appraisal of Issues and Options:

Option 14.2 generally performs better across all relevant objectives, there are particular benefits across social and economic objectives. With regards to environmental objectives, there is potential benefit of option 14.1 associated with the loss of undeveloped land. This benefit of option 14.1 (objective 1.1) will depend on whether the land that would have been allocated to a local centre is left undeveloped or whether it would be used for other development.

Approach to Preferred Options:

In accordance with national planning policy in PPS1 which seeks to create sustainable communities, a local centre will act as the focus for the new community and help to establish its special character and identity. By co-locating as many services and facilities, there can be a more efficient use of scarce land and buildings through shared buildings and facilities which can lead to better customer service and considerable savings especially for operational efficiency. The provision of such services and facilities in a local centre will also enable small-scale employment to be located within and/or alongside the local centre to reinforce its function.

By linking the local centre to the network of pedestrian and cycle routes as well as public transport routes, the development can become an exemplar of sustainable living. A single centre will also enable a journey for one purpose to serve another, thus reducing the overall number and length of journeys and providing opportunities for social interaction.

The location of the local centre at the heart of the development will assist in bringing together the two parts of the development either side of the strategic gap and thus encouraging the creation of a cohesive community. The local centre can also provide for some of the needs of those who live or work in neighbouring communities, particularly the sector of North West Cambridge which will be developed to the north of Huntingdon Road and the University's West Cambridge Site, south of Madingley Road.

Any Changes resulting from Draft Final Sustainability Report:

- Sustainability Appraisal Recommendation:

There were no negative impacts identified by the assessment. One recommendation is that, although the Policy promotes public transport access, it will be important to ensure that this enables access to the centre for all elements of the community. This should be mitigated through NW2 (1 (b)).

- Councils' Response

Noted. Policy unchanged.

Summary of Preferred Option:

Option 14.1 has been taken forward in preferred option NW21 in order to act as the focus for the new community and help to establish its special character and identity.

Summary of Results of Preferred Options Community Involvement:

Policy NW21:

1 objections	3 supports
--------------	------------

- Support for new facilities in the area, these should meet the needs of existing residents as well as new ones.

Alternative Options Resulting from Preferred Options Consultation:

Not applicable.

Response:

- The AAP states that the local centre can also provide for some of the needs of those who live or work in neighbouring communities, particularly the sector of North West Cambridge which will be developed to the north of Huntingdon Road and the University's West Cambridge Site, south of Madingley Road. However, in accordance with Circular 5/2005, any provision must be directly related to the proposed development and planning obligations should not be used solely to resolve existing deficiencies in infrastructure provision.

Any Changes Resulting from the Final Sustainability Appraisal:

None proposed.

Tests of Soundness:

Procedural:

- (i) In accordance with Local Development Scheme
- (ii) Compliance with Statement of Community Involvement*
- (iii) Subjected to Sustainability Appraisal

Conformity:

- (iv) with national planning policy and Regional Spatial Strategy
- (v) regard to the Community Strategies**

Coherence, consistency and effectiveness:

- (vi) Policies are coherent and consistent

- (vii) Policies are most appropriate in all circumstances,
 are founded on a robust and credible evidence base, and relevant alternatives were considered
- (viii) Clear mechanisms for implementation and monitoring
- (ix) Plan is flexible to deal with changing circumstances

*The document has been prepared in accordance with Cambridge City Council's adopted SCI and the minimum regulations set out in The Town and Country Planning (Local Development) (England) Regulations 2004.

** As a joint plan, it should have regard to the Community Strategies of both Councils

Conclusions:

Policy NW21 has been amended and taken forward in the Submission Draft AAP and is considered to be sound.

Community Services and Facilities

Policy NW22: Public Art

Summary of Issues and Options consulted on:

It was considered that there were no options for the subject of consultation at the Issues & Options stage.

Summary of results of Issues and Options Community Involvement:

Not applicable.

New Options Arising Following Issues and Options Community Involvement:

Not applicable.

Summary of Initial Sustainability Appraisal of Issues and Options:

Not applicable.

Approach to Preferred Options:

The provision of public art will assist in creating the distinctive character of North West Cambridge. The provision of quality visual arts and crafts as part of new developments can bring social, cultural, environmental, educational and economic benefits, both to the new development and to the community at large. It is considered particularly important that public art is integrated into the overall design of North West Cambridge and functional elements e.g. lighting, street furniture, floor designs and signage as well as landmark works such as sculpture.

Given the scale of development at North West Cambridge it is considered important to set out the level of public art provision sought. In addition, a strategy for public art is required, with the appointment of a lead artist(s) at an early stage in the planning and design of development.

Any Changes resulting from Draft Final Sustainability Report:

- *Sustainability Appraisal Recommendation:*

Most detailed mitigation for this policy should be implemented through the Masterplan. Recommend that the policy or policy background include integration of public engagement requirements.

- *Councils' Response:*

Agree. Supporting text altered.

Summary of Preferred Option:

Policy NW22 has been taken forward as the preferred option as the provision of public art will assist in creating the distinctive character of North West Cambridge.

Summary of Results of Preferred Options Community Involvement:

Policy NW22:

3 objections	0 supports
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- The 1% requirement for public art should be a target not a minimum requirement.

Alternative Options Resulting from Preferred Options Consultation:

Not applicable.

Response:

- Policy NW22 should be consistent with other planning policy guidance: delete 'at least 1%' and replace with 'at a cost equal to 1%'.

Any Changes Resulting from the Final Sustainability Appraisal:

None proposed.

Tests of Soundness:

Procedural:

- (i) In accordance with Local Development Scheme
- (ii) Compliance with Statement of Community Involvement*
- (iii) Subjected to Sustainability Appraisal

Conformity:

- (iv) with national planning policy and Regional Spatial Strategy
- (v) regard to the Community Strategies**

Coherence, consistency and effectiveness:

- (vi) Policies are coherent and consistent
- (vii) Policies are most appropriate in all circumstances, are founded on a robust and credible evidence base, and relevant alternatives were considered
- (viii) Clear mechanisms for implementation and monitoring
- (ix) Plan is flexible to deal with changing circumstances

*The document has been prepared in accordance with Cambridge City Council's adopted SCI and the minimum regulations set out in The Town and Country Planning (Local Development) (England) Regulations 2004.

** As a joint plan, it should have regard to the Community Strategies of both Councils

Conclusions:

Policy NW22 has been amended and taken forward in the Submission Draft AAP and is considered to be sound.

Recreation

Policy NW23: Open Space and Recreation Provision

Summary of Issues and Options consulted on:

Two options in relation to open space and recreation facilities were consulted on:

Option 15.1 – Open space and recreation facilities should be provided on site.

Option 15.2 – Some open space and recreation facilities could be provided by commuted payments.

Summary of results of Issues and Options Community Involvement:

Option 15.1:

1 objection	10 supports	1 comment
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- The need for such provision should be applied on a site-by-site basis and planning obligations should adhere to the tests of Circular 5/05;
- Could have an impact on the viability of the development.

Option 15.2:

3 objections	2 supports	2 comments
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- Any provision of recreational and strategic open space should comply with the Green Infrastructure Strategy;
- There is deficiency of such provision in this part of Cambridge and the proposed higher density of housing necessitates adequate and full open space and other recreational provision;
- The need for such provision should be applied on a site-by-site basis and planning obligations should adhere to the tests of Circular 5/05.

New Options Arising Following Issues and Options Community Involvement:

Not applicable.

Summary of Initial Sustainability Appraisal of Issues and Options:

Overall, environmental and social benefits to the local environment and community are greater with option 15.1. It should be borne in mind that the strategic location of the open space could enhance the greenbelt area and mitigate against impacts of the development on the townscape, thus retaining some distinctive gap between Cambridge and Girton.

Approach to Preferred Options:

In accordance with national planning policy in PPG17 (Planning for Open Space, Sport and Recreation) it is important to ensure that those living, working and visiting North West Cambridge have easy access to high quality open spaces and recreation facilities which can lead to healthy lifestyles and a high quality of life and entertainment. Its provision will also enhance the setting of the City and add to its special character, amenity and biodiversity.

Furthermore, provision should be made for Strategic Open Space, which is the sub-regional network of green spaces and linkages. This could include improved access from North West Cambridge into the wider countryside and other areas of Strategic Open Space, such as the Coton Countryside Reserve. These linkages will be important to those living and working in North West Cambridge to ensure access to the wider countryside and also to provide connectivity for reasons of biodiversity.

Where appropriate such provision should be made on site or otherwise through commuted payments. In most cases on site provision is preferred as the facility will be close to the development. However, for some facilities this will not be possible and in such cases a commuted sum will be required.

Any Changes resulting from Draft Final Sustainability Report:

- *Sustainability Appraisal Recommendation:*

1. The supporting text para 8.1 should be amended to, “many open space uses are not mutually exclusive”.
2. The policy background text should be amended to promote a strategic approach to locating all open and green space encouraging the use of pedestrian and cycle routes

- *Councils’ Response:*

1. Agree. Policy altered.
2. Noted.

Summary of Preferred Option:

A combination of options 15.1 and 15.2 has been taken forward in preferred option NW23, which requires the provision of open space and recreation facilities.

Summary of Results of Preferred Options Community Involvement:

Policy NW23:

1 objection	5 supports
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- Need to make reference to green infrastructure, including a suggestion that cultural heritage features will be accommodated.

Alternative Options Resulting from Preferred Options Consultation:

Not applicable

Response:

Agree that green infrastructure has a wider remit than open space and recreation provision alone. Accordingly it would be more suitable to clarify the need to consider green infrastructure. Cultural heritage features such as the historic landscape, archaeological features and conservation areas are already dealt with in the Development Principles section and for avoidance of repetition should not be reiterated here. Suggest that amendments are made to Objective O of the Area Action Plan.

Any Changes Resulting from the Final Sustainability Appraisal:

None proposed.

Tests of Soundness:

Procedural:

- (i) In accordance with Local Development Scheme
- (ii) Compliance with Statement of Community Involvement*
- (iii) Subjected to Sustainability Appraisal

Conformity:

- (iv) with national planning policy and Regional Spatial Strategy
- (v) regard to the Community Strategies**

Coherence, consistency and effectiveness:

- (vi) Policies are coherent and consistent
- (vii) Policies are most appropriate in all circumstances, are founded on a robust and credible evidence base, and relevant alternatives were considered
- (viii) Clear mechanisms for implementation and monitoring
- (ix) Plan is flexible to deal with changing circumstances

*The document has been prepared in accordance with Cambridge City Council's adopted SCI and the minimum regulations set out in The Town and Country Planning (Local Development) (England) Regulations 2004.

** As a joint plan, it should have regard to the Community Strategies of both Councils

Conclusions:

Preferred Option NW23 has been taken forward in the Submission Draft Area Action Plan and is considered to be sound.

Natural Resources

Policy NW24: Climate Change & Sustainable Design and Construction

Summary of Issues and Options consulted on:

It was considered that there were no options for the subject of consultation at the Issues & Options stage, as Government guidance supporting the setting of specific levels of sustainable design in local development documents was not published until December 2006.

Summary of results of Issues and Options Community Involvement:

Although no related options were presented in the Issues & Options Report, the following issues were raised during the consultation process:

- Reference should be made to up-to-date innovative standards for sustainable homes and buildings;
- Should also address the need for improved energy efficiency as well as renewable energy provision as both are important in relation to climate change mitigation;
- The AAP should require all buildings to be low energy and achieve Ecohomes 'very good' or 'excellent' ratings;
- The need to minimise use of resources and ensure buildings are adapted to climate change are not included – there is a need to be specific about these elements.

New Options Arising Following Issues and Options Community Involvement:

Not applicable.

Summary of Initial Sustainability Appraisal of Issues and Options:

Not applicable.

Approach to Preferred Options:

The Stern Review (2006) identified that climate change will have profound and rising costs for global and national prosperity, people's health and the natural environment. Even with effective policies for reducing emissions in place, the world will still experience significant climate change over the coming decades from emissions of carbon dioxide and other greenhouse gases already released. To this end, the Government's recent consultation paper "Planning Policy Statement: Planning and Climate Change Supplement to PPS1" (Dec 2006), sets out how spatial planning, in providing for the new homes, jobs and infrastructure needed by communities, should help shape places with lower carbon emissions and resilient to the climate change now accepted as inevitable. At paragraph 1.13 the document states that where there are demonstrable and locally specific

opportunities for requiring higher levels of building performance it is proposed these should be set out in advance in a DPD. This could include where there is a significant local opportunity for major development to be delivered at higher levels of the Code for Sustainable Homes. The Code for Sustainable Homes complements the Governments aims for all new development to be zero carbon by 2016, with a 25% improvement in energy/carbon performance by 2010 (Building a Greener Future: Towards Zero Carbon Development, 2006).

In addition, Regional Planning Policy in the form of Policy SS1 of the Secretary of States Proposed Changes to the draft East of England Plan (2006) encourage local development documents to assist in the achievement of obligations on carbon emissions and adopt a precautionary approach to climate change by avoiding or minimising potential contributions to adverse change and incorporate measures which adapt as far as possible to unavoidable change.

It is felt the favourable nature and significant scale of development proposed at North West Cambridge, provides a unique opportunity to set specific code levels (code level 4) for residential buildings, with a view to increase this to code level 5 for anything approved after 2012. This is in part due to the fact that this is a greenfield site, with few if any of the constraints of a brownfield site. It is also in single ownership by a body that will have a long-term interest in the site and can therefore benefit from the long-term savings some of these measures will generate. Achieving these code levels will also allow for better adaptation to climate change, including minimum standards for water efficiency and better management of surface water run-off thus reducing the risk of flooding.

Any Changes resulting from Draft Final Sustainability Report:

- *Sustainability Appraisal Recommendation:*

1. The policy should be rephrased to ensure the highest possible standards are aspired to, unless it can be proven that they are not reasonable for technological, economical or environmental reasons;
2. There should be a clear distinction between the CSH and BREEAM standards. CSH applies to residential development, taking over from EcoHomes whereas BREEAM will apply to all other developments. This split needs to be distinct and clear;
3. To avoid confusion between climate change mitigation (reduction in CO₂) and adaptation (flood defences) the last sentence of para 9.1. should be amended to read: "North West Cambridge will need to play its part in helping to reach this goal, balancing the overall increased emissions due to the scale of the development, with the opportunities that new development offers for reducing carbon emissions, through such measures as sustainable design and the provision of decentralised and renewable energy sources.";
4. The supporting text makes an important link between adapting to future increased temperatures, but at the same time reducing emissions, therefore also acting to mitigate climate change. However, it is thought that 'air

conditioning' or 'active cooling systems' could be substituted for 'active heating and cooling systems', in order to add to clarity; and

5. This Policy refers to sustainable design, but could also be used to promote sustainable construction. Amend Part B to read "...sustainable design and construction in line with..."

- *Councils' Response:*

1. Agree. Policy altered;
2. Agree. Policy altered;
3. Agree. Supporting text altered;
4. Disagree as the supporting text refers only to climate change and both heating and cooling systems contribute to this. Supporting text unchanged;
5. Agree. Policy altered.

Summary of Preferred Option:

Policy NW24 has been taken forward as the preferred option, which requires development to be designed to adapt to the predicted effects of climate change, achieving high levels of sustainable design in line with the Code for Sustainable Homes, which is consistent with Government policy.

Summary of Results of Preferred Options Community Involvement:

Policy NW24:

6 objections	3 supports
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- Levels are far from a high degree of sustainability. Code level 5 should be the absolute minimum for residential;
- 'Excellent' should be the minimum standard for non-residential;
- An approach that delivers Code level 4 up to 2016 and Code level 6 beyond 2016 would provide a more realistic delivery path;
- There is a need for greater clarity and certainty in the proposed approach, particularly clarification of the relationship between Policy Options NW24 and NW29;
- In their attempt to be seen to be rising to meet the challenges set by climate change many regions, sub regions and local authorities are taking it upon themselves to move faster than the timetable attached to the Code for carbon reduction;
- The policy duplicates the role of Building Regulations;
- A concerted effort needs to be made to reduce carbon emissions from the existing housing stock.

Alternative Options Resulting from Preferred Options Consultation:

Not applicable.

Response:

With regards to the Code for Sustainable Homes levels being sought on this site, this approach is supported by national planning policy in the form of the PPS Planning and Climate Change. Paragraph 31 of the PPS supports the Councils position on bringing forward the timetable for the Code for Sustainable Homes at this site. It states that "there will be situations where it could be appropriate for planning authorities to anticipate levels of building sustainability in advance of those set nationally". The Councils have commissioned a study which has found that the use of Combined Heat and Power (CHP) is viable on this site. The use of CHP at North West Cambridge will result in considerable carbon emission reduction and assist it in meeting the specified Code Levels.

At the same time, care must be taken to ensure that the levels being sought do not affect the viability of the development, therefore it is not considered appropriate at this time to require the development to be brought forward at Code Level 5 from the outset. The Planning and Climate Change PPS makes it clear, that in the case of housing development, care must be taken that such requirements do not affect the delivery of the housing trajectory or affordable housing.

The Councils agree that planning policy should not duplicate Building Regulations. However, the PPS also supports planning authorities in specifying specific local requirements for sustainable buildings, "for example in the case of housing by expecting identified housing proposals to be delivered at a specific level of the Code for Sustainable Homes" (Paragraph 32).

The Councils agree that emissions from the existing housing stock are an issue that needs to be tackled. However it is not for the Area Action Plan to deal with this issue as it is solely concerned with the provision of new development.

With regards to the non-residential element of the development, the Councils agree that the standard should be raised to BREEAM 'excellent' from the outset. As previously mentioned, the use of CHP onsite at North West Cambridge will make a significant contribution to carbon reduction from the non-residential elements of the development, thus making BREEAM excellent more achievable from the outset. Given the Government's current thinking on introducing an equivalent to the Code for Sustainable Homes for non-residential development, the policy will be amended to reflect this. It will also make reference to student accommodation as this is not considered under the Code for Sustainable Homes.

Given the mixed use nature of this development and the fact that not all standards relate to the same type of development, it has been decided, in response to a representation from the Government Office, to combine policy NW24 with policies NW25 (Renewable Energy) and NW29 (Water Conservation) to ensure clarity and certainty as to which standards will apply to which type of development (i.e. residential and non-residential).

Therefore, policy NW24 will be pursued in the Submission Draft Area Action Plan, subject to the amendments referred to above.

Any Changes Resulting from the Final Sustainability Appraisal:

None proposed.

Tests of Soundness:

Procedural:

- (i) In accordance with Local Development Scheme
- (ii) Compliance with Statement of Community Involvement*
- (iii) Subjected to Sustainability Appraisal

Conformity:

- (iv) with national planning policy and Regional Spatial Strategy
- (v) regard to the Community Strategies**

Coherence, consistency and effectiveness:

- (vi) Policies are coherent and consistent
- (vii) Policies are most appropriate in all circumstances, are founded on a robust and credible evidence base, and relevant alternatives were considered
- (viii) Clear mechanisms for implementation and monitoring
- (ix) Plan is flexible to deal with changing circumstances

*The document has been prepared in accordance with Cambridge City Council's adopted SCI and the minimum regulations set out in The Town and Country Planning (Local Development) (England) Regulations 2004.

** As a joint plan, it should have regard to the Community Strategies of both Councils

Conclusions:

Preferred Options NW24 has been amended and taken forward in the Submission Draft Area Action Plan and this approach is considered to be sound.

Natural Resources

Policy NW24 (Previously Preferred Policy Option NW25): Renewable Energy

Summary of Issues and Options consulted on:

Four options relating to the provision of renewable energy were consulted on:

- Option 18.1: Provision of at least 10% of the developments predicted energy requirements on-site, from renewable energy sources;
- Option 18.2: Provision of at least 20% of the developments predicted energy requirements on-site, from renewable energy sources;
- Option 18.3: In addition to renewable energy, a requirement for combined heat and power to meet the energy needs of a considerable proportion of the development; and
- Option 18.4: If combined heat and power is not suitable, then a district heating scheme to meet the heating needs of a considerable proportion of the development.

Summary of results of Issues and Options Community Involvement:

Option 18.1:

4 objections	1 support	1 comment
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- The policy is too weak;
- The suggestion that housing developments could provide 10% or indeed 20% renewable energy is strongly questioned;
- Renewable energy issues should not stifle regeneration and development

Option 18.2:

4 objections	4 supports	1 comment
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- Current policies require 10% and it is considered unreasonable to require a much higher target for this development;
- Will local planning authorities support the provision of large wind turbines on this site;
- The suggestion that housing developments could provide 10% or indeed 20% renewable energy is strongly questioned;
- Renewable energy issues should not stifle regeneration and development

Option 18.3:

2 objections	5 supports
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- The environmental advantages and financial viability of CHP are to a large extent dependent on the size and timing of demand and residential development might provide a reliable base load for CHP.

Option 18.4:

1 objection	4 supports	2 comments
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- The plan should not specify a policy requirement in advance of a feasibility study and testing;
- Need to make it clearer that the 20% renewable energy obligation applies with a district heating scheme if it is found that a combined heat and power scheme is not suitable.

New Options Arising Following Issues and Options Community Involvement:

Not applicable.

Summary of Initial Sustainability Appraisal of Issues and Options:

The Sustainability Appraisal found that option 18.3 performed best on relevant sustainability objectives due to reduced greenhouse gas emissions, increased resource recovery, greater energy sourcing from renewables and enhanced competitiveness. The relative sustainability of option 18.4 in terms of increased resource recovery and greater energy sourcing from renewables will be dependent on the type of energy harnessed for the district heating scheme and the extent to which it would provide energy to the development.

Approach to Preferred Options:

PPS22 states that local planning authorities may include policies in local development documents that require a percentage of the energy to be used in new residential, commercial or industrial developments to come from on-site renewable energy developments. The draft PPS on Planning and Climate Change expects a high level of ambition in this regard, stating that LPA's should ensure that a significant proportion of the energy supply of substantial new development is gained on-site and renewably and/or from decentralised, renewable or low-carbon energy supply. In addition, the draft PPS also expects all new developments to consider and take into account the potential of decentralised energy supply systems based on renewable and low-carbon energy sources such as CHP.

In terms of Regional Strategy, the Secretary of States Proposed Changes to the East of England Plan state that Local Authorities should, through DPDs, set ambitious but viable proportions of energy supply in substantial new developments to come from on-site and/or decentralised renewable or low carbon energy sources, and that in the interim **as a minimum** 10% of the energy consumed in new developments should come from such sources. The supporting text for the East of England Plan goes on to state the planning policies should move development in

the region towards the Government's ambition of zero-carbon development countrywide by 2016.

Given the mixed-use and relatively high density nature of the development at North West Cambridge, along with the requirements of policy NW24 relating to the Code for Sustainable Homes, it is felt that a target of 20% on-site renewables will be viable for this development along with either CHP or a district heating scheme (a combination of options 18.2, 18.3 and 18.4). The University, with its experience in building services management is likely to be very well placed to manage the system. The policy does contain a caveat stating that this requirement will be relaxed if it can be clearly demonstrated that to require full compliance would not be viable. Flexibility also exists within the requirement for CHP, although if this is found to be unviable, the requirement for a district heating scheme will then be sought.

Any Changes resulting from Draft Final Sustainability Report:

- Sustainability Appraisal Recommendation:

1. The compatibility with the requirements for the levels of CSH needs to be checked. Also, as with the previous policy, a clear distinction between residential and other uses, and their respective requirements needs to be made;
2. Part 1 of the Policy recognises that some developments will not be able to feasibly meet the 20% on-site renewables requirement. In order to ensure that all development results in carbon reduction benefits it is suggested that Part 1 of the Policy be extended to state that: Where a development can demonstrate that generating on-site renewables is not viable, then there is a requirement to demonstrate how a similar reduction in carbon emissions will be achieved through energy conservation (in addition to energy conservation required through any other Policy);
3. There needs to be a clearer hierarchy in Part two of the policy, as CHP can be fuelled by biofuels, just as a DHS. A possible hierarchy could be:
 - CHP fuelled by biomass;
 - CHP fuelled by gas;
 - District heating fuelled by biomass;
 - District heating fuelled by gas
4. It is also recommended that priority be made for energy demand reduction first, then renewable technology second, as reduction of energy demand is higher up the energy hierarchy and will result in lower overall GHG emissions.

- Councils' response

1. Disagree as this sets a minimum standard for the development as a whole. Policy unchanged;

2. Disagree as energy conservation is already required under policy NW24 and will still be a requirements if policy NW25 cannot be met. Policy unchanged;
3. Agree. Supporting text, rather than policy, altered although recommended wording not used;
4. Disagree as both go hand in hand. Policy unchanged.

Summary of Preferred Option:

A combination of options 18.2, 18.3 and 18.4 have been taken forward in preferred option NW25, which provides for the provision of at least 20% renewable energy along with a requirement for either combined heat and power or a district heating scheme. This approach is consistent with both national and regional policy and will contribute to the development of a sustainable new urban extension on the edge of Cambridge.

Summary of Results of Preferred Options Community Involvement:

Policy NW25:

3 objections	3 supports
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- The figure should be 100% with no possibility of relaxation;
- The 20% target is not consistent with adopted policy in the Cambridge Local Plan or the South Cambridgeshire DC Policies DPD and the emerging Regional Spatial Strategy (14% of electricity consumption by 2010 and 17% by 2020);
- Planning policy should not be a tool to define and control what are essentially energy generation considerations, seek to control the use of power within dwellings or be concerned with the fabric of the building. It should solely be concerned with removing barriers to the siting or development of new innovations;
- A concerted effort needs to be made to reduce carbon emissions from the existing housing stock.
- The target significantly exceeds the measurement criteria for local renewable/low carbon energy sources (10% and 15%) as set out in the Code for Sustainable Homes;

Alternative Options Resulting from Preferred Options Consultation:

Not applicable.

Response:

With regards to the figure being 100%, the Area Action Plan has to be consistent with national planning policy. In particular, paragraph 33 of the Planning Policy Statement Planning and Climate Change states that planning authorities should, in

the case of housing development and when setting development area or site-specific expectations, demonstrate that the proposed approach is consistent with securing the expected supply and pace of housing development shown in the housing trajectory required by PPS3, and does not inhibit the provision of affordable housing. It is felt that it would not be possible to bring forward 100% renewable energy provision at this site without there being a negative impact on bringing forward the housing numbers required in both Councils areas.

The purpose of the North West Cambridge Area Action Plan is to provide site-specific policies to guide development in this area of Cambridge. As such, it should be viewed as a stand-alone document from both the Cambridge Local Plan and South Cambridgeshire Development Control Policies DPD. The policy of requiring 20% renewable energy is consistent with South Cambridgeshire District Councils Core Strategy (Strategic objectives ST/c and ST/g). The approach of setting higher targets for specific sites is also consistent with regional policy. Policy ENG1 of the Secretary of States Proposed Changes and Further Proposed Changes to the Draft Revision to the Regional Spatial Strategy calls for local planning authorities to maximise opportunities for renewable energy and to set new yardsticks of performance, particularly in major locations and Key Centres for Development Change.

With regards to the argument that planning policy should not be a tool to define and control what are energy generation considerations, the Councils disagree with this as national planning policy supports and encourages local planning authorities in setting renewable energy targets for new developments. For example, paragraph 20 of the Planning Policy Statement Planning and Climate Change, which has superseded elements of PPS22, states that planning authorities should “expect a proportion of the energy supply of new development to be secured from decentralised and renewable or low-carbon energy sources”.

The Councils agree that carbon emissions from the existing housing stock are an issue that needs to be tackled. However, it is not for the North West Cambridge Area Action Plan to address this issue as the document is concerned with bringing forward new development.

Disagree that the Code for Sustainable Homes specifies a 10-15% renewables requirement for any of the different levels. The Code follows the Building Regulations methodology for achieving a percentage improvement on the mandatory dwelling emission rate (DER) for each level of the Code and awards additional points for the provision of either 10% or 15% low or zero carbon technologies. However, in light of the fact that the Code uses a mandatory DER, it is considered unnecessary to add an onsite renewable energy requirement to the Code requirements, although such a requirement will remain for non-residential development and student accommodation as these are not covered by the Code. The Councils have commissioned a study which has found that the use of Combined Heat and Power (CHP) is viable on this site. The use of CHP at North West Cambridge will make a significant contribution to the 20% requirement for non-residential development.

Any Changes Resulting from the Final Sustainability Appraisal:

None proposed.

Tests of Soundness:

Procedural:

- (i) In accordance with Local Development Scheme
- (ii) Compliance with Statement of Community Involvement*
- (iii) Subjected to Sustainability Appraisal

Conformity:

- (iv) with national planning policy and Regional Spatial Strategy
- (v) regard to the Community Strategies**

Coherence, consistency and effectiveness:

- (vi) Policies are coherent and consistent
- (vii) Policies are most appropriate in all circumstances,
 are founded on a robust and credible evidence base, and relevant alternatives were considered
- (viii) Clear mechanisms for implementation and monitoring
- (ix) Plan is flexible to deal with changing circumstances

*The document has been prepared in accordance with Cambridge City Council's adopted SCI and the minimum regulations set out in The Town and Country Planning (Local Development) (England) Regulations 2004.

** As a joint plan, it should have regard to the Community Strategies of both Councils

Conclusions:

Policy NW25 has been combined with Policy NW24 and taken forward in the Submission Draft AAP and is considered to be sound.

Natural Resources

Policy NW25 (Previously Preferred Policy Option NW26): Surface Water Drainage

Summary of Issues and Options consulted on:

One option relating to surface water drainage was consulted on:

Option 20.1: Storm Water Drainage to be designed as far as possible in line with Sustainable Drainage Systems with drainage, recreation, biodiversity and amenity value.

Summary of results of Issues and Options Community Involvement:

5 objections	5 supports
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- Drainage plans should seek to actively decrease rainwater input to the Washpit;
- Should include a statement that SUDs should not affect the SSSI and wet areas;
- Does not consider the wider catchment area (catchment wide study needed); and
- SUDs challenged as a suitable solution

New Options Arising Following Issues and Options Community Involvement:

Not applicable.

Summary of Initial Sustainability Appraisal of Issues and Options:

These measures should perform better in terms of reducing vulnerability to flooding than if there were no measures. The significance of positive impacts on limiting water consumption will be dependent on drainage system specifications and how these can be integrated with option 20.6 (water conservation) and other development options. Water is a key sustainability issue within the region and these measures could provide mitigation measures against indirect impacts of development options.

Approach to Preferred Options:

National planning policy in the form of PPS25 (Development and Flood Risk) aims to ensure that flood risk is taken into account at all stages in the planning process in order to avoid inappropriate development in areas at risk of flooding, and to direct flooding away from areas at highest risk. Reduction of flood risk to and from new developments through location, layout and design, incorporating sustainable

drainage systems (SUDs) is advocated and as such the use of SUDs to reduce flood risk is consistent with national planning policy. The practice guide companion to PPS25 provides further advice, stating that local planning authorities should ensure that policies encourage sustainable drainage practices in their local development documents. Priority should be given to the use of infiltration drainage techniques as opposed to discharging surface water to watercourses, and where this is not possible discharging site run-off to watercourses is perceived to be preferable to the use of sewers.

The effectiveness of SUDs is largely dependent on choosing the most appropriate ones for a site and designing, constructing and maintaining them effectively. There are a wide range of different SUDs techniques or components available and while it is acknowledged that not all SUDs may be applicable to this site, for example soakage SUDs, other SUDs techniques may be suitable, for example rainwater harvesting, filter strips and swales, filter drains and porous pavements and basins and ponds. In line with the requirements of PPS25, the specific types of SUDs to be employed at North West Cambridge will need to be demonstrated at the planning application stage. A Strategic Water and Drainage Strategy will be required to support a planning application, including a strategic scale flood risk assessment for the site and any impact on the wider catchment and detailing the types of SUDs proposed and options for future adoption and maintenance arrangements. This strategy will be assessed by the Environment Agency.

The use of SUDs to achieve wider benefits for biodiversity and local amenity is also consistent with government policy as set out in PPS25 and PPS9 (Biodiversity and Geological Conservation). Where possible SUDs will be encouraged that will enhance biodiversity by creating additional habitats, for example through the use of basins and ponds.

As flood risk downstream of the development is already an issue for neighbouring communities such as the Parishes of Histon and Impington and Girton, reducing flood risk from this development is essential. By creating impermeable areas on what is currently a greenfield site, surface water flows leaving this area will increase significantly and potentially exacerbate flooding problems downstream. SuDS can provide a long term, sustainable solution to this, as well as delivering biodiversity, microclimate and amenity benefits.

Therefore option 20.1 will be pursued in the draft AAP subject to amendments to ensure that SUDs will also address surface runoff in the event of ordinary rainfall events as well as storm events as well as making allowances for the forecast effects of climate change.

Any Changes resulting from Draft Final Sustainability Report:

- Sustainability Appraisal Recommendation:

1. Part 2 of the Policy should be reworded to increase clarity. It could be stated that: "The SuDS will seek to hold water on the site, ensuring that it is released

- to surrounding watercourses at an equal, or slower, rate than is the case prior to development”; and
2. In order to increase clarity, Part 4 of the Policy could be reworded to state that: “Any surface water drainage scheme will need to be capable of reducing the down stream flood risk as well as normal rainfall events under future climate change scenarios”.

- *Councils’ Response:*

1. Agree. Policy altered;
2. Agree. Policy altered although recommended wording not used.

Summary of Preferred Option:

Option 20.1 has been taken forward in preferred option NW26 to encourage the use of a Sustainable Drainage System for the site to deal with surface water drainage and to ensure that all flood mitigation measures make allowance for the forecast effects of climate change, an approach consistent with Government policy.

Summary of Results of Preferred Options Community Involvement:

Policy NW26:

2 objections	8 supports
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- A Section 106 grant should be given to the Parish Councils in order for them to appoint professional advice to scrutinise the developers flood risk assessment and to implement necessary ameliorations;
- Policies should reflect recent development in strategic management of water resources and the Catchment Wide Studies now being developed by the Environment Agency;
- Recent survey work on the 350m culvert carrying the Award Drain beneath the B1049 in Histon and Impington has amplified our grave concerns over flood risk and structural soundness;
- The nature of and general lack of detail in the draft AAP raises the same concerns as those raised in response to the Cambridge North West Transport Study and David Wilson Homes Planning Application.

Alternative Options Resulting from Preferred Options Consultation:

Not applicable.

Response:

In line with the requirements of PPS25, the developer will be required to submit a flood risk assessment with their planning application. This will be required to demonstrate how all types of flood risk to the development itself and flood risk to others will be managed now and taking climate change into account. PPS25 also

requires the management of flood “pathways” to reduce the likelihood of flooding by ensuring that the design and location of new development maximises the use of SUDs, and takes account of its susceptibility to flooding, the performance and processes of river systems and appropriate flood defence infrastructure, and the likely routes and storage of flood water and its influence on flood risk downstream. The flood risk assessment will also be expected to make use of all up to date information available for the area, including Catchment Wide Studies. Any necessary flood risk management measures will need to be sufficiently funded to ensure that the site can be developed and occupied safely throughout its proposed lifetime.

With regards to scrutiny of the flood risk assessment, the Environment Agency have statutory responsibility for flood management and defence in England. As such, they will scrutinise the flood risk assessment and, where necessary, recommend ameliorations where these are considered appropriate. Therefore, in accordance with the requirements of Circular 05/05, it is not considered appropriate for S106 monies to be given to the Parish Council to carry out their own appraisal of the flood risk assessment.

The level of detail sought by some representors is considered inappropriate for the Area Action Plan. Additional detail may lead to the repetition of information contained within national planning policy in the form of PPS25. It is felt that the information provided in the preferred options report provides a balance between flexibility and the need to provide a sufficient level of detail to make clear the requirements in relation to Surface Water Drainage at North West Cambridge.

Therefore preferred option NW26 will be pursued in the Submission Draft Area Action Plan.

Any Changes Resulting from the Final Sustainability Appraisal:

None proposed.

Tests of Soundness:

Procedural:

- (i) In accordance with Local Development Scheme
- (ii) Compliance with Statement of Community Involvement*
- (iii) Subjected to Sustainability Appraisal

Conformity:

- (iv) with national planning policy and Regional Spatial Strategy
- (v) regard to the Community Strategies**

Coherence, consistency and effectiveness:

- (vi) Policies are coherent and consistent

- (vii) Policies are most appropriate in all circumstances,
 are founded on a robust and credible evidence base, and relevant alternatives were considered
- (viii) Clear mechanisms for implementation and monitoring
- (ix) Plan is flexible to deal with changing circumstances

*The document has been prepared in accordance with Cambridge City Council's adopted SCI and the minimum regulations set out in The Town and Country Planning (Local Development) (England) Regulations 2004.

** As a joint plan, it should have regard to the Community Strategies of both Councils

Conclusions:

Policy NW26 (renumbered NW25) has been taken forward in the Submission Draft Area Action Plan and is considered to be sound.

Natural Resources

Policy NW26 (Previously Preferred Policy Option NW27): Foul Drainage and Sewage Disposal

Summary of Issues and Options consulted on:

It was considered that there were no options for the subject of consultation at the Issues & Options stage.

Summary of results of Issues and Options Community Involvement:

Although no related options were presented in the Issues & Options Report, the following issues were raised during the consultation process:

- The issue of foul water drainage is not addressed in the overall drainage scheme for the AAP. The implications of additional discharges from receiving Sewage Treatment Works are likely to have to be assessed as part of the Flood Risk Assessment for the Site.

New Options Arising Following Issues and Options Community Involvement:

Not applicable.

Summary of Initial Sustainability Appraisal of Issues and Options:

Not applicable.

Approach to Preferred Options:

The issue of foul drainage and sewage disposal is an important element that must be addressed by a policy in the draft AAP. In accordance with the requirements of the Water Framework Directive (WFD), the treatment of wastewater must not cause the deterioration of the water environment thereby compromising WFD objectives. Government Guidance in the form of PPS25 states that all forms of flooding, including flooding from sewers, and their impact on the natural and built environment are material planning considerations.

Policy WAT2 (Water Resource Development) of the Secretary of States proposed changes to the East of England Plan states that local development documents should plan to site new development so as to maximise the potential of existing water/waste treatment infrastructure thus minimising the need for new/improved infrastructure. Adverse impact on sites of European or International importance for nature conservation must be avoided. The supporting text for this policy states that additional capacity for wastewater treatment will need to be included in Water Company Investment Plans.

The foul water produced at North West Cambridge will be directed to Cambridge Sewage Treatment Works at Milton to take advantage of consolidating existing facilities. Anglian Water are currently undertaking an appraisal of sewerage provision for the whole catchment and the outcome of that appraisal will inform the approach to be followed for foul water arising from North West Cambridge.

Any Changes resulting from Draft Final Sustainability Report:

- *Sustainability Appraisal Recommendation:*

It could be beneficial to refer to integrated approaches to the treatment of wastewater that include grey water recycling as part of sustainable design and construction (promoted by policy NW24).

- *Councils' Response:*

Noted. This policy already forms part of an integrated water strategy for North West Cambridge. Policy unchanged.

Summary of Preferred Option:

Policy NW27 has been taken forward as the preferred option as it addresses the issue of treated and untreated wastewater and links the start and phased development of the site to the availability of wastewater treatment capacity and the capacity of receiving watercourses in accordance with Government policy and European legislation.

Summary of Results of Preferred Options Community Involvement:

Policy NW27:

1 objections	3 supports
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- Provision of wastewater infrastructure should be in accordance with the emerging Water Cycle Strategy currently being prepared by Cambridgeshire Horizons;
- Phasing of development should take into account the practicability and sustainability of wastewater infrastructure improvements recommended by the Water Cycle Strategy;
- Policy should reflect recent development in strategic management of water resources and the Catchment Wide Strategies now being developed by the Environment Agency;
- Recent survey work on the 350m culvert carrying the Award Drain beneath the B1049 in Histon and Impington has amplified our grave concerns over flood risk and structural soundness;

Alternative Options Resulting from Preferred Options Consultation:

Not applicable.

Response:

In line with the requirements of PPS25, the developer will be required to submit a flood risk assessment with their planning application and this will be scrutinised by the Environment Agency. This site specific flood risk assessment will be required to demonstrate how all types of flood risk to the development itself and flood risk to others will be managed now and taking climate change into account. PPS25 also requires the management of flood "pathways" to reduce the likelihood of flooding by ensuring that the design and location of new development maximises the use of SUDs, and takes account of its susceptibility to flooding, the performance and processes of river systems and appropriate flood defence infrastructure, and of the likely routes and storage of floodwater and its influence on flood risk downstream. The flood risk assessment will also be expected to make use of all up to date information available for the area.

With regards to the phasing of the development, provision of wastewater infrastructure at North West Cambridge will be in accordance with the Water Cycle Strategy when this becomes available

Therefore, preferred option NW27 will be pursued in the Submission Draft Area Action Plan.

Any Changes Resulting from the Final Sustainability Appraisal:

None proposed.

Tests of Soundness:

Procedural:

- (i) In accordance with Local Development Scheme
- (ii) Compliance with Statement of Community Involvement*
- (iii) Subjected to Sustainability Appraisal

Conformity:

- (iv) with national planning policy and Regional Spatial Strategy
- (v) regard to the Community Strategies**

Coherence, consistency and effectiveness:

- (vi) Policies are coherent and consistent
- (vii) Policies are most appropriate in all circumstances, are founded on a robust and credible evidence base, and relevant alternatives were considered
- (viii) Clear mechanisms for implementation and monitoring
- (ix) Plan is flexible to deal with changing circumstances

*The document has been prepared in accordance with Cambridge City Council's adopted SCI and the minimum regulations set out in The Town and Country Planning (Local Development) (England) Regulations 2004.

** As a joint plan, it should have regard to the Community Strategies of both Councils

Conclusions:

Policy NW27 (renumbered NW26) has been taken forward in the Submission Draft Area Action Plan and is considered to be sound.

Natural Resources

Policy NW27 (Previously Preferred Policy Option NW28): Management and Maintenance of Surface Water Drainage Systems

Summary of Issues and Options consulted on:

Four options relating to management and maintenance of watercourses were consulted on:

- Option 20.2: All water bodies and watercourses to be maintained and managed by a specific trust which would be publicly accountable and funded in perpetuity by taking ownership of commercial property;
- Option 20.3: All water bodies and watercourses to be maintained and managed by the two Councils;
- Option 20.4: All water bodies and watercourses would be maintained and managed by Anglian Water; and
- Option 20.5: All water bodies and watercourses would be maintained and managed by Cambridge University

Summary of results of Issues and Options Community Involvement:

Option 20.2:

3 objections	5 supports	1 comment
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Option 20.4:

3 objections

Option 20.5:

3 objections

It is too early to prescribe the means by which water bodies and watercourses would be managed.

New Options Arising Following Issues and Options Community Involvement:

Not applicable.

Summary of Initial Sustainability Appraisal of Issues and Options:

Overall, option 20.2 performs best. It is thought that a designated trust would have more time and resources to maintain the waterways. In addition, the focus of the trust on a specific task will be of benefit to overall management of waterways.

Approach to Preferred Options:

Planning Policy Statement 25 sets out that those proposing development are responsible for ensuring that any flood risk management measures are sufficiently funded to ensure that the site can be developed and occupied safely throughout its proposed lifetime. As part of the site specific flood risk assessment required to accompany a planning application, consideration must be given to flood risk management measures and how the site will be protected from flooding, including the potential impacts of climate change over the lifetime of the development.

A National SUDS Working Group (NSWG), established to address the perceived issues impeding the widespread use of SUDS in England and Wales, has developed an interim code of practice to help overcome the specific problems of SUDs adoption (Interim Code of Practice for SUDs, NWSG, 2004). Complemented by the CIRIA publication "C625 Model Agreements of SUDs", the code provides a set of model arrangements to facilitate uptake of SUDs by providing a mechanism for maintenance, based on current legislation and the current planning system. The model agreements developed achieve this through the planning process, either as a planning obligation or as a condition attached to planning permission.

While it is too early to prescribe the exact means by which management and maintenance will occur, it is vital that the draft AAP makes it clear that management and maintenance will be guaranteed in perpetuity of development. Option 20.2, preferred by the Sustainability Appraisal, allows sufficient flexibility in referring to a specific trust that will be publicly accountable while not setting out how this Trust will be composed. As such the preferred policy option to be taken forward in the draft AAP will be based on option 20.2.

Any Changes resulting from Draft Final Sustainability Report:

Sustainability Appraisal Recommendation:

1. Part 2 of the Policy could be reworded to add to clarity. This could read:
"No development shall commence until the written agreement of the local planning authorities has been secured stating that organisations with sufficient powers, funding, resources, expertise and integrated management are legally committed to maintain and manage all surface water systems on the North West Cambridge site in perpetuity;
2. Reference should be made to the type of monitoring, such as ecological/biological/hydrological conditions into the future to ensure that good conditions are being maintained.

- Councils' Response:

1. Agree. Policy altered;
2. Disagree as this will be covered by the written agreement. Policy unchanged

Summary of Preferred Option:

Option 20.2 has been taken forward in preferred option NW28, which states that no development shall commence until organisations with sufficient powers, funding, resources, expertise and integrated management are legally committed to maintain and manage all surface water systems on the site. This approach is consistent with Government policy.

Summary of Results of Preferred Options Community Involvement:

Policy NW28:

3 objections	3 supports
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- Concern that the major problems begin when the water leaves the site, and obligations should be built in concerning the history of the water at least as far as the Cottenham Lode, preferably all the way to the Ouse;
- Policy should reflect recent development in strategic management of water resources and the Catchment Wide Strategies now being developed by the Environment Agency;
- Recent survey work on the 350m culvert carrying the Award Drain beneath the B1049 in Histon and Impington has amplified our grave concerns over flood risk and structural soundness.

Alternative Options Resulting from Preferred Options Consultation:

Not applicable.

Response:

In line with the requirements of PPS25, the developer will be required to submit a flood risk assessment, which will need to demonstrate how all types of flood risk to the development itself and flood risk to others will be managed now and taking climate change into account. PPS25 also requires the management of flood "pathways" to reduce the likelihood of flooding by ensuring that the design and location of new development maximises the use of SUDs, and takes account of its susceptibility to flooding, the performance and processes of river systems and appropriate flood defence infrastructure, and of the likely routes and storage of floodwater and its influence on flood risk downstream. The flood risk assessment will also be expected to make use of all up to date information available for the area.

In planning for development in areas at risk of flooding, a strategic approach is recommended by PPS25 that avoids adding to the causes or "sources" of flood risk by a number of means including minimising flood risk from new development onto adjacent and other downstream properties and into river systems. The flood risk assessment will need to be proportionate to the risk and appropriate to the scale, nature and location of the development and consider the effects of a wide range of

flooding events, including extreme events, on people, property, the natural and historic environment and river and coastal processes. The developer will be required to provide mitigation measures to deal with any negative impacts that are a result of the proposed development. These mitigation measures, along with the flood risk assessment itself, will be scrutinised by the Environment Agency.

It is vital that surface water drainage systems are managed and maintained in perpetuity, therefore preferred option NW28 will be pursued in the Submission Draft Area Action Plan.

Any Changes Resulting from the Final Sustainability Appraisal:

None proposed.

Tests of Soundness:

Procedural:

- (i) In accordance with Local Development Scheme
- (ii) Compliance with Statement of Community Involvement*
- (iii) Subjected to Sustainability Appraisal

Conformity:

- (iv) with national planning policy and Regional Spatial Strategy
- (v) regard to the Community Strategies**

Coherence, consistency and effectiveness:

- (vi) Policies are coherent and consistent
- (vii) Policies are most appropriate in all circumstances, are founded on a robust and credible evidence base, and relevant alternatives were considered
- (viii) Clear mechanisms for implementation and monitoring
- (ix) Plan is flexible to deal with changing circumstances

*The document has been prepared in accordance with Cambridge City Council's adopted SCI and the minimum regulations set out in The Town and Country Planning (Local Development) (England) Regulations 2004.

** As a joint plan, it should have regard to the Community Strategies of both Councils

Conclusions:

Policy NW28 (renumbered NW27) has been amended and taken forward in the Submission Draft Area Action Plan and is considered to be sound.

Natural Resources

Policy NW29: Water Conservation (now part of Policy NW24)

Summary of Issues and Options consulted on:

One option relating to water conservation was consulted on:

Option 20.6: Aims to reduce water consumption generally seeking a balance in the management of water recycling so that there is no adverse impact on the water environment and biodiversity.

Summary of results of Issues and Options Community Involvement:

Option 20.6:

2 objections	5 supports
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- Policy is not strong enough (mandatory grey water recycling and rainwater capture);
- Include targets for the reduction of water use;
- Need to ensure no adverse effects on the water environment and biodiversity;
- The AAP should specify a requirement to reduce per capita water consumption by at least 25%.

New Options Arising Following Issues and Options Community Involvement:

Not applicable.

Summary of Initial Sustainability Appraisal of Issues and Options:

These potential measures perform well in terms of limiting water consumption to levels supportable by natural processes and storage systems. How well these measures perform is dependent on how these are implemented and the level to which they can mitigate any indirect adverse impacts of development options on water use. Since definitive methods cannot be stipulated prior to preferred options, at this stage the significance of such positive impacts are uncertain. However, it is asserted that these impacts will be positive to no such measures being put in place. In addition, water is a key sustainable issue within the region and these measures could provide mitigation measures against indirect impacts of development options.

Approach to Preferred Options:

Paragraph 5 of PPS1 (Delivering Sustainable Development) states that planning should facilitate and promote sustainable and inclusive patterns of development

by, amongst other things, ensuring high quality development through good and inclusive design and the efficient use of resources. As noted in the Sustainability Appraisal of the Issues & Options Report, water resources are a key sustainability issue in the East of England, an area that has the lowest rainfall in the country and is officially described as being semi-arid. A high proportion of the available water resource is already being exploited and as such, even allowing for the impact of climate change, careful management of water will be crucial if the economic potential of the Cambridge Sub-Region is to continue to be realised. The Environment Agency's Water Resources Strategy for the East of England seeks a 'twin track' approach to meet the increasing demand for water in the region, whereby water efficiency and increased supply must go hand in hand. While the responsibility for planning and managing water supply, including the submission of water resource plans, rests with water supply companies, planning can help achieve water conservation targets by adopting policies and supporting measures that help to reduce per capita water consumption.

Policy WAT1 of the Secretary of States Proposed Changes to the East of England Plan seeks to ensure that the development provided for in the Spatial Strategy is matched with improvements in water efficiency, which will be delivered through a progressive, year on year, reduction in per capita consumption rates. The target in EERA's monitoring framework should achieve savings in water use compared with 2006 levels equivalent to at least 25% in new development. The East of England Plan envisages that this target will be pursued through a co-ordinated programme of measures including changes to Building Regulations, the Code for Sustainable Homes, fiscal measures, incentive schemes and other regional measures.

The preferred approach for NW Cambridge is linked to the requirements of preferred policy option NW24, which sets out a requirement for all homes at North West Cambridge to achieve code level 4 of the Code for Sustainable Homes, rising to code level 5 for anything approved after 2012 in line with guidance contained in the proposed planning policy statement on Planning and Climate Change. As well as introducing minimum standards for energy efficiency, the code also introduces minimum standards for water efficiency. At code level 4 the water consumption rate stands at 105 litres per person per day, which represents a 30% reduction in water compared to the 2005/2006 industry standard of 151 litres per head per day for water only companies (source: OFWAT Report, Security of supply, leakage and water efficiency 2005-06). Anything approved after 2012 will be required to meet code level 5, at which the water consumption rate stands at 80 litres per person per day, representing a 47% reduction in water consumption compared to the 2005/06 industry standard.

In line with the requirements of the Water Framework Directive, care must be taken to ensure that water reuse and recycling does not have an adverse impact on the water environment. In accordance with the requirements of PPS9 (Biodiversity and Geological Conservation) a balance must also be struck to ensure no adverse impact on biodiversity or sites of international importance.

Any Changes resulting from Draft Final Sustainability Report:

- *Sustainability Appraisal Recommendation:*

1. This Policy should be internally coherent with Policy NW24 and the Code for Sustainable Homes in terms of standards and timescale;
2. The supporting text refers to water conservation measures reducing 'the overall demand for water'. This is not strictly true as the development will in fact increase overall demand for water in what is already a water stressed region. The Policy should aim to reduce per capita demand for water;
3. Paragraph 2 of the supporting text refers to 'improving the efficiency of water supply'. This should be changed to 'water use'; and
4. The final sentence of paragraph 9.18 should read 'adverse affect on biodiversity, or the wider water environment, in accordance with the Water Framework Directive'.

- *Councils' Response:*

1. This is already the case as the percentages are based on the Code for Sustainable Homes (as compared to the 2005/06 industry standard). Policy unchanged;
2. Agree. Supporting text altered;
3. Agree. Supporting text altered;
4. Agree. Supporting text altered.

Summary of Preferred Option:

Option 20.6 has been taken forward in preferred option NW29, which seeks at least a 30% reduction in water consumption, rising to at least 47% after 2012, while ensuring that there will be no adverse impact on the water environment or biodiversity. This approach is consistent with European Legislation as well as Government and Regional policy.

Summary of Results of Preferred Options Community Involvement:

Policy NW29:

5 objections	5 supports
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- These levels would appear to be totally unrealistic – a recent survey has indicated that the target of 100lpppd is extremely difficult to reach, even by people who have water conservation high on their personal agenda;
- I do not see how 'including water saving devices, rainwater harvesting and grey water recycling' can be made part of the AAP when the University admits it has not investigated the issue;
- It is unclear as to the precise justification and evidence base for the water consumption specified;

- Policy should reflect recent development in strategic management of water resources and the Catchment Wide Strategies now being developed by the Environment Agency;
- Recent survey work on the 350m culvert carrying the Award Drain beneath the B1049 in Histon and Impington has amplified our grave concerns over flood risk and structural soundness;
- There is a need for greater clarity and certainty in the proposed approach to higher environmental building standards, particularly clarification of the relationship between Policy Options NW24 and NW29;

Alternative Options Resulting from Preferred Options Consultation:

Not applicable.

Response:

The Councils disagree that the levels of water conservation proposed are unrealistic. The provision of new development allows for the infrastructure necessary to support such levels to be put in place before the first residents move in. Any assessment carried out with regards to the practicality of incorporating Grey Water Recycling at North West Cambridge will be scrutinised by the Councils.

The levels proposed are in line with the levels of the Code for Sustainable Homes being sought on site and the Area Action Plan will be amended to clarify that these levels are for the residential element of the development, although water conservation measures will also be sought from non-residential development. In a report relating to the Regional Spatial Strategy for the East of England, the Environment Agency advised that there would be sufficient water resources to support the planned growth in the region **provided** that water efficiency measures were incorporated into new developments.

With regards to the policy needing to reflect recent developments in the strategic management of water resources, the Environment Agency have indicated their support for the levels of water conservation being sought at this site. Issues relating to flooding are more adequately by policies NW26 and NW27.

The concerns with regards to clarity and certainty are noted and the policy will be amended to address this issue. This will be dealt with through combining policy NW29 with policy NW24 to provide certainty with regards to the relationship with the water conservation measures being sought and the Code for Sustainable Homes and to clarify the approach to be taken with regards to non-residential development.

Any Changes Resulting from the Final Sustainability Appraisal:

None proposed.

Tests of Soundness:

Procedural:

- (i) In accordance with Local Development Scheme
- (ii) Compliance with Statement of Community Involvement*
- (iii) Subjected to Sustainability Appraisal

Conformity:

- (iv) with national planning policy and Regional Spatial Strategy
- (v) regard to the Community Strategies**

Coherence, consistency and effectiveness:

- (vi) Policies are coherent and consistent
- (vii) Policies are most appropriate in all circumstances,
 are founded on a robust and credible evidence base, and relevant alternatives were considered
- (viii) Clear mechanisms for implementation and monitoring
- (ix) Plan is flexible to deal with changing circumstances

*The document has been prepared in accordance with Cambridge City Council's adopted SCI and the minimum regulations set out in The Town and Country Planning (Local Development) (England) Regulations 2004.

** As a joint plan, it should have regard to the Community Strategies of both Councils

Conclusions:

Policy NW29 will be combined with Preferred Policy NW24 and taken forward in the Submission Draft AAP, this approach is considered sound.

Delivery

Policy NW28 (Previously Preferred Policy Option NW30): Construction Process

Summary of Issues and Options consulted on:

One option in relation to the construction process was consulted on:

Option 19.1 – The construction process will need careful management in order to avoid disruption to adjacent parts of the City and Girton. It would also not be appropriate to transport spoil over considerable distances and the general principle should be for construction spoil to be treated and utilised on site.

Summary of results of Issues and Options Community Involvement:

Option 19.1:

4 objections	6 supports
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- Should include a statement to protect the SSSI and wet areas;
- Long-term usage of areas needs to be considered (i.e. clay-rich sub-soils may not be suitable for sports and recreational facilities);
- Reference needs to be made to sustainable design & construction methods;
- Need to make the policy more robust & require developers to produce & implement a site waste management plan

New Options Arising Following Issues and Options Community Involvement:

Not applicable.

Summary of Initial Sustainability Appraisal of Issues and Options:

The mitigation measures perform well against environmental and social objectives, in terms of efficient use of resources and reduced noise and vibration pollution. This will have an indirect impact on human health since noise and vibration pollution is known to contribute to stress and other adverse impacts particularly on mental health.

Approach to Preferred Options:

Careful management of the construction process is consistent with PPS1 which requires development to protect and enhance the natural environment, the quality and character of the countryside and existing communities. The development of North West Cambridge will take place over a number of years and the construction process will need careful management in order that disruption to adjacent parts of the City and Girton as well as parts of North West Cambridge which have already

been built is avoided. Avoidance of impact will be the objective, but where this is not possible, disruption will be kept to a minimum both in magnitude and duration.

In accordance with the principles of efficient use or reuse of existing resources set out in PPS1, any existing resources available on the site, such as materials from redundant buildings, can help reduce the amount of materials that have to be imported onto the site.

Furthermore, it would not be appropriate to transport construction spoil over considerable distances as this would be unsustainable and simply transfer the problem elsewhere. The general principle should be for construction spoil to be treated and utilised on-site. However, it would not be acceptable to alter the landforms locally by concentrating the spoil into one or more large mounds as this would introduce an alien character into this area.

Any Changes resulting from Draft Final Sustainability Report:

- *Sustainability Appraisal Recommendation:*

The Policy should include a requirement for all construction traffic to use the most effect and sustainable access to the site.

- *Councils' Response:*

This is covered in the supporting text to the policy – paragraph 10.5.

Summary of Preferred Option:

Option 19.1 has been taken forward in preferred option NW30 in order to achieve sustainable development as required by PPS1.

Summary of Results of Preferred Options Community Involvement:

Policy NW30:

1 objections	2 supports
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- Construction impacts and mitigation measures will be identified in the Environmental Impact Assessment which will accompany the planning application.
- Policy generally vague and more detail required during the later stages of the planning process.
- Construction waste must not be placed in mounds or beams near the boundary where it will diminish the amenity of neighbouring houses or in such a way as to create surface water or sub surface runoff from the site.

Alternative Options Resulting from Preferred Options Consultation:

Not applicable.

Response:

- The AAP does acknowledge in paragraph 10.4 that the development at North West Cambridge will take place over a number of years and the construction process can have implications for amenity, public safety and the landscape setting of Cambridge and Girton if not properly planned. Realistically, it will not be possible to avoid any adjoining existing areas but measures should be taken to reduce the impact as far as possible. A Construction Environmental Management Plan including a Site Waste Management Plan will be required to support a planning application.
- Policy NW30 requires that where practicable the development will accommodate construction spoil within the development, whilst taking account of the landscape character and avoiding creation of features alien to the topography and paragraph 10.2 goes on to state that it would not be acceptable to alter the land forms locally by concentrating the spoil into one or more large mounds as this would introduce an alien character into the area. Furthermore, Policy NW2 sets out a number of overarching development principles that will guide the development of North West Cambridge, with the aim that development takes account of its surroundings, including existing buildings, open spaces and existing urban and villages edges to ensure that development does not harm local amenity and where possible brings benefits to the area. In accordance with this policy, planning permission would not be granted where the proposed development or associated mitigation measures would have an unacceptable adverse impact on residential amenity, on the quality of the urban edge, on flooding and flood risk, on quality of ground or surface water and on adjacent conservation areas.
- However, in order to provide more clarity part b of Policy NW30 should be amended to include reference to local urban character in addition to landscape character.

Any Changes Resulting from the Final Sustainability Appraisal:

None proposed.

Tests of Soundness:

Procedural:

- (i) In accordance with Local Development Scheme
- (ii) Compliance with Statement of Community Involvement*
- (iii) Subjected to Sustainability Appraisal

Conformity:

(iv) with national planning policy and Regional Spatial Strategy

(v) regard to the Community Strategies**

Coherence, consistency and effectiveness:

(vi) Policies are coherent and consistent

(vii) Policies are most appropriate in all circumstances, are founded on a robust and credible evidence base, and relevant alternatives were considered

(viii) Clear mechanisms for implementation and monitoring

(ix) Plan is flexible to deal with changing circumstances

*The document has been prepared in accordance with Cambridge City Council's adopted SCI and the minimum regulations set out in The Town and Country Planning (Local Development) (England) Regulations 2004.

** As a joint plan, it should have regard to the Community Strategies of both Councils

Conclusions:

Policy NW30 (renumbered NW28) has been taken forward in the Submission Draft Area Action Plan and is considered to be sound.

Delivery

Policy NW29 (Previously Preferred Policy Option NW31): Strategic Landscaping

Summary of Issues and Options consulted on:

One option in relation to the strategic landscaping was consulted on:

Option 22.3 – A landscape strategy will be needed to ensure that each part of the development area is landscaped, managed and protected where practical before much of the development is started and appropriate landscaping is completed upon completion of each phase of development.

Summary of results of Issues and Options Community Involvement:

Option 22.3:

1 objection	5 supports
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- The need for such provision should be applied on a site-by-site basis and planning obligations should adhere to the tests of Circular 5/05

New Options Arising Following Issues and Options Community Involvement:

Not applicable.

Summary of Initial Sustainability Appraisal of Issues and Options:

These measures will potentially have a positive effect on mitigating impacts and maintaining the diversity and distinctiveness of the landscape and townscape character, relative to no such measure being in place. In addition the measures will help to create places, spaces and buildings that work well with the landscape. Landscape impacts could potentially be significant should there be development on the ridge, together with development impacts on the character and distinctiveness of Cambridge and Girton and landscaping issues around the site. The significance of the positive impacts of these measures are at this stage uncertain. This will be dependent on preferred options and how far these measures can mitigate against any adverse impacts.

Approach to Preferred Options:

Part of the strategy for minimising impacts of the development will involve the landscaping of the site as part of the overall development. Landscaping will involve earth moving and the general management of spoil which will be created from digging footings, land drains, surface water attenuation lakes etc. Woodlands, individual trees and hedgerows will also be planted.

The delivery of an agreed landscape strategy will need to be implemented and managed to ensure that strategic landscaping is carried out prior to each phase of development and maintained closely throughout the construction period.

Such strategic landscaping, delivered through an agreed landscape strategy will ensure the creation as a high quality development as required by the vision.

Any Changes resulting from Draft Final Sustainability Report:

- *Sustainability Appraisal Recommendation:*

The Policy should make explicit the requirement to link providing high quality habitat (including the planting of trees of local genetic stock) that is strategically located in order to reduce habitat fragmentation with improving the quality of open space and green space.

- Councils' Response:

Noted.

Summary of Preferred Option:

Option 22.3 has been taken forward in preferred option NW31 in order to ensure the creation of a high quality development as required by the vision.

Summary of Results of Preferred Options Community Involvement:

Policy NW31:

1 objection	4 supports
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- Implementation and phasing of strategic landscaping must take into account overall development viability and consideration of additional infrastructure provision at the same time.
- General support for the provision of landscaping at an early stage.
- The chapter's subsection should refer to mitigation works being carried out for noise and air pollution arising from the M11.
- Appropriate ecological surveys should be undertaken to inform the determination of planning applications.

Alternative Options Resulting from Preferred Options Consultation:

Not applicable.

Response:

- Paragraph 10.15 of the AAP states that the overall viability of the development will be taken into consideration in the decision on the level of planning obligations to be incorporated into the S106 Agreement at the planning application stage.
- Paragraph 2.9 of the AAP states that it is important that the design of the development fully takes into account the impact of noise and air pollution arising from the M11 and A14, in relation to the amenity and health of residents, workers and school children, the amenity and use of open spaces and impact upon the setting of Cambridge. Furthermore, the use of certain types of physical acoustic barrier such as a fence alongside the M11 is unlikely to be acceptable in this sensitive location.
- A number of studies and strategies need to be in place before planning permission can be granted, to ensure that the policy requirements of the plan are met and a high quality, sustainable development is achieved. A biodiversity strategy will need to address the protection and enhancement of biodiversity interests on the site and any appropriate mitigation measures and close liaison with Natural England will be required during the planning application process.

Any Changes Resulting from the Final Sustainability Appraisal:

None proposed.

Tests of Soundness:

Procedural:

- (i) In accordance with Local Development Scheme
- (ii) Compliance with Statement of Community Involvement*
- (iii) Subjected to Sustainability Appraisal

Conformity:

- (iv) with national planning policy and Regional Spatial Strategy
- (v) regard to the Community Strategies**

Coherence, consistency and effectiveness:

- (vi) Policies are coherent and consistent
- (vii) Policies are most appropriate in all circumstances, are founded on a robust and credible evidence base, and relevant alternatives were considered
- (viii) Clear mechanisms for implementation and monitoring
- (ix) Plan is flexible to deal with changing circumstances

*The document has been prepared in accordance with Cambridge City Council's adopted SCI and the minimum regulations set out in The Town and Country Planning (Local Development) (England) Regulations 2004.

** As a joint plan, it should have regard to the Community Strategies of both Councils

Conclusions:

Policy NW31 (renumbered NW29) has been taken forward in the Submission Draft Area Action Plan and is considered to be sound.

Delivery

Policy NW30 (Previously Preferred Policy Option NW32): Phasing & Need

Summary of Issues and Options consulted on:

Two options in relation to phasing of the development were consulted on:

Option 22.1 – The first phase of the development will take place close to the existing part of the built up area of Cambridge to the east and then move westwards as the needs of the University are proven.

Option 22.2 – the first phase of development will take place around the local centre moving outwards as the needs of the University are proven.

Summary of results of Issues and Options Community Involvement:

Option 22.1:

1 objection	3 supports
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- A strong local centre is needed from the outset

Option 22.2:

1 objection	4 supports
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- Unless option 10.1 is preferred it is not clear where the new local centre will be located or whether it would be viable to bring it forward as the focal point for the first phase of development

New Options Arising Following Issues and Options Community Involvement:

Not applicable.

Summary of Initial Sustainability Appraisal of Issues and Options:

Option 22.1 performs better on environmental objectives due to the potentially reduced area of land take if University needs are not demonstrated i.e. there may be less development of a local centre than option 22.2 if the needs of the University are realised at an early stage of housing development. However, the development of a local centre early on in development will ensure local residents have access to services and facilities throughout construction phases of residential development. It should be noted that the benefits of option 22.2 relative to 22.1 are short term in nature. However, the benefits of option 22.1 would be long term if they are realised.

Option 22.1 may result in cumulative impacts on the environment due to a greater use of undeveloped land. These impacts would include loss of open space and biodiversity. The cumulative impacts of 22.1 would lie with the local economy and local provision of services and facilities, however, these would be short term in nature.

Approach to Preferred Options:

The Structure Plan and Cambridge Local Plan clearly state that this land should only be brought forward when the University can show a clear need for it to be released. The site is in proximity to the University's existing West Cambridge site, south of Madingley Road, which is the current focus for the growth of the University. Other sites in the City are allocated for University and student housing uses in the Cambridge Local Plan. Accordingly, a Needs Statement is required to support a planning application to satisfactorily demonstrate the need for development and that it cannot reasonably be met elsewhere. This would take into account factors such as viability, land availability, ownership, location, accessibility and suitability.

This land is also identified as a Strategic Employment Location in the Structure Plan and again is subject to the University proving the need for the development; the site therefore will enable the long-term growth of the University education and research cluster in Cambridge. There is, however, a generous supply of other land for some of these uses on the West Cambridge site and elsewhere in the City.

The phasing of the development should have regard to the creation of a sustainable community from the outset and as the development progresses. This is particularly important as the development will be implemented over a long period as the University's needs arise although the early establishment of a viable local centre should not be undermined.

Members had previously indicated a preference for option 22.1 with development starting in the east and moving westwards. However, it is considered that such phasing details are highly dependant on masterplanning and therefore this matter should be left to this stage to determine.

Any Changes resulting from Draft Final Sustainability Report:

- *Sustainability Appraisal recommendations:*

Reference should be made to the strategic aim of phasing and to the nature of receptors exposed to impacts during the construction of the development (i.e. current and future residents).

- *Councils' Response:*

This is covered by the Policy NW30 and the supporting text – paragraph 10.4.

Summary of Preferred Option:

Neither option (22.1 & 22.2) should be taken forward as the preferred option; instead this matter should be addressed through masterplanning as stated in preferred option NW32.

Summary of Results of Preferred Options Community Involvement:

Policy NW32:

3 objections	1 support
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- The University has demonstrated its needs case for residential housing provision and student housing.
- Phasing is far too important to be left to masterplanning and there is a risk that it will be a piecemeal development if the need for each phase has to be proven individually.
- It is important that the need for this development is proven before it proceeds.

Alternative Options Resulting from Preferred Options Consultation:

Not applicable.

Response:

- In accordance with saved Structure Plan policy P9/2c, land should be released from the Green Belt for predominantly University related uses and only brought forward when the University can show a clear need for land to be released. The AAP clearly states that as the purpose of this development is to address the University's needs, the priority must be on the provision of housing for Cambridge University and College key workers and the provision of open market housing is necessary to make the whole development viable. However, housing is not the only use that is being sought on site and therefore given the site is in proximity to the University's existing West Cambridge site, south of Madingley Road, which is the current focus for the growth of the University and other sites in the City are allocated for University and student housing uses in the Cambridge Local Plan, it is important that as development comes forward, the University can satisfactorily demonstrate the need for the development and that it cannot reasonably be met elsewhere. A needs statement would therefore take in account factors such as viability, land availability, ownership, location, accessibility and suitability. Part 3 of policy should be amended to reflect that the AAP does not have an end date and therefore such safeguarding is not required.
- Before any planning permission for development at North West Cambridge can be granted it will be necessary to ensure that the development will be

delivered in accordance with the principles set out in the Area Action Plan and as required by policy NW3, a masterplan will be prepared as part of the supporting information to the application for the grant of planning permission to ensure that a comprehensive and high quality accessible development can be achieved. In order to ensure that development is not before forward in a piecemeal way a phasing and implementation strategy will be required to support a planning application and paragraph 10.10 to policy NW32 highlights that the phasing of the development should have regard to the creation of a sustainable community from the outset and as the development progresses.

Any Changes Resulting from the Final Sustainability Appraisal:

None proposed.

Tests of Soundness:

Procedural:

- (i) In accordance with Local Development Scheme
- (ii) Compliance with Statement of Community Involvement*
- (iii) Subjected to Sustainability Appraisal

Conformity:

- (iv) with national planning policy and Regional Spatial Strategy
- (v) regard to the Community Strategies**

Coherence, consistency and effectiveness:

- (vi) Policies are coherent and consistent
- (vii) Policies are most appropriate in all circumstances, are founded on a robust and credible evidence base, and relevant alternatives were considered
- (viii) Clear mechanisms for implementation and monitoring
- (ix) Plan is flexible to deal with changing circumstances

*The document has been prepared in accordance with Cambridge City Council's adopted SCI and the minimum regulations set out in The Town and Country Planning (Local Development) (England) Regulations 2004.

** As a joint plan, it should have regard to the Community Strategies of both Councils

Conclusions:

Policy NW32 (renumbered NW30) has been taken forward in the Submission Draft Area Action Plan and is considered to be sound.

Delivery

Policy NW31 (Previously Preferred Policy Option NW33): Infrastructure Provision

Summary of Issues and Options consulted on:

One option in relation to infrastructure provision was consulted on:

Option 22.4 – Provision will be sought for physical and community infrastructure to meet the needs of the new community to an agreed timetable.

Summary of results of Issues and Options Community Involvement:

Option 22.4:

2 objections	5 supports	1 comment
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- All key services, facilities & infrastructure should be provided ahead of time;
- The need for such provision should be applied on a site-by-site basis and planning obligations should adhere to the tests of Circular 5/05

New Options Arising Following Issues and Options Community Involvement:

Not applicable.

Summary of Initial Sustainability Appraisal of Issues and Options:

This plan will ensure that quality, range and accessibility of services are provided. The significance of such positive impacts will be dependent on the decision-making process and the outputs of such a process.

Approach to Preferred Options:

The development of North West Cambridge will create additional demands for physical and social infrastructure, as well as having impacts on the environment. In such cases planning obligations will be required, in accordance with Government guidance (Circular 05/2005), to make any necessary improvements, provide new facilities, or secure compensatory provision for any loss or damage created. The nature and scale of contributions sought will be related to the size of the development and to the extent it places additional demands upon the area.

The overall viability of the development will be taken into consideration in the decision on the level of planning obligations to be incorporated into the Section 106 Agreement at the planning application stage.

Any Changes resulting from Draft Final Sustainability Report:

- Sustainability Appraisal Recommendations:

To ensure the comprehensiveness of the list of types of infrastructure for which contributions will be sought 'energy infrastructure' could be added to the list in para 10.13

- Councils' Response:

Agree. Policy altered.

Summary of Preferred Option:

Option 22.4 has been taken forward in preferred option NW33 in order to ensure a range of suitable infrastructure, services and facilities are provided to meet the needs of the new community.

Summary of Results of Preferred Options Community Involvement:

Policy NW33:

1 objection	1 support
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- Support is given to contributions that fund the cost of providing infrastructure needed as a result of development.
- Improvements to Cambridge Station should be identified as one possible transport infrastructure schemes in the Area Action Plan.
- A key piece of evidence for phasing will be the water Cycle Strategy which is being produced by Cambridgeshire Horizons.

Alternative Options Resulting from Preferred Options Consultation:

Not applicable.

Response:

- Such detail is not a matter for the Area Action Plan. The precise nature and scale of contributions sought will be related to the size of the development and to the extent that it places additional demand on the area. Such detail will be discussed at the planning application stage, through focused S106 discussions.

Any Changes Resulting from the Final Sustainability Appraisal:

None proposed.

Tests of Soundness:

Procedural:

- ✓ (i) In accordance with Local Development Scheme
- ✓ (ii) Compliance with Statement of Community Involvement*
- ✓ (iii) Subjected to Sustainability Appraisal

Conformity:

- ✓ (iv) with national planning policy and Regional Spatial Strategy
- ✓ (v) regard to the Community Strategies**

Coherence, consistency and effectiveness:

- ✓ (vi) Policies are coherent and consistent
- ✓ (vii) Policies are most appropriate in all circumstances, are founded on a robust and credible evidence base, and relevant alternatives were considered
- ✓ (viii) Clear mechanisms for implementation and monitoring
- ✓ (ix) Plan is flexible to deal with changing circumstances

*The document has been prepared in accordance with Cambridge City Council's adopted SCI and the minimum regulations set out in The Town and Country Planning (Local Development) (England) Regulations 2004.

** As a joint plan, it should have regard to the Community Strategies of both Councils

Conclusions:

Policy NW33 (renumbered NW31) has been taken forward in the Submission Draft Area Action Plan and is considered to be sound.