

Cambridge Local Plan

Inspector's Report

2006

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GLOSSARY

AAP	Area Action Plan
CCC	Cambridge City Council Changes to correct typographical errors and make other minor corrections
CD	Core Document
CGB	Cambridgeshire Guided Bus
CPZ	Controlled Parking Zone
dph	dwellings per hectare
DPD	Development Plan Document
EIP	Examination in Public
FDD	First Deposit Draft version of the Local Plan
FPC	Further Proposed Changes
HNS	Housing Needs Survey
HQPT	high quality public transport
LDF	Local Development Framework
LDS	Local Development Scheme
PPG	Planning Policy Guidance
PPS	Planning Policy Statement
RDD	Redeposit Draft version of the Local Plan
RPG	Regional Planning Guidance
RSL	Registered Social Landlord
RSS	Regional Spatial Strategy
SC	Pre-Inquiry Changes (also known as Suggested Changes)
SPD	Supplementary Planning Document
SPG	Supplementary Planning Guidance
SUDS	Sustainable Urban Drainage System
TA	Transport Assessment
UCS	Urban Capacity Study
WWTW	Waste Water Treatment Works

INSPECTOR'S NOTE

Before the inquiry the Council advertised a number of Pre Inquiry Changes (SCs) to the RDD. During the inquiry Further Proposed Changes (FPCs) were suggested by the Council. Some of the changes are simple textual corrections or factual updates, which do not affect the underlying meaning or policy content of the Plan. Therefore, unless I comment to the contrary, the Council may take it that I am content with the inclusion of a SC or FPC. The same applies to SCs where no objection was made.

0. WHOLE PLAN

0.1 WHOLE PLAN

Objections

Cambridge Preservation Society University of Cambridge Estate Management & Building Service	26/50/DEP01/TWP
P.M. Forman Christ's College	273/1/DEP01/TWP 280/2/DEP01/TWP 364/1/DEP01/TWP 364/2/DEP01/TWP 364/4/DEP01/TWP
Sarah Forman J.K.H. Rees Sue Anderson Lorna Knox Ceri Galloway Cllr John Durrant	579/1/DEP01/TWP 546/1/DEP02/TWP 737/1/DEP02/TWP 739/1/DEP02/TWP 805/1/DEP02/TWP 838/6/DEP02/TWP

Summary of Objections

- There are objections to the detailed wording of policies, and more emphasis should be given to parts of the Plan.
- The Plan should not aim for further growth, which would harm biodiversity and lead to an increase in traffic.
- The Plan lacks detail as to how policies will be implemented. The use of supplementary planning guidance (SPG) will undermine public confidence.
- The University and Colleges should be exempt from provisions, "taxes" or commuted payments required in the Plan.
- Objection is made to the relocation of Cambridge Airport.
- Attention is drawn to some typographical errors.

Inspector's Reasoning and Conclusions

0.1.1. Objections to the wording of specific policies are considered later in this report. However, in general the meaning of policies in the Plan is clear, and the addition of the word "only" before the word "if" where it appears in policies would not add significantly to the clarity of those policies. In the RDD paragraph 1.26 appears in bold type, which gives it an appropriate level of emphasis.

0.1.2. Both RPG 6 and the Structure Plan set growth targets for Cambridge City and the sub-region. The Structure Plan identifies specific areas in Cambridge for new development, and the Plan must contain policies to regulate that development. The additional development proposed in the Plan for Cambridge is intended to provide more opportunities to travel by public transport, by cycle or on foot. The Plan makes provision for the redevelopment of the Cambridge Station area, which would incorporate an improved public transport interchange, and a new station at Chesterton Sidings is also proposed. In addition, the urban extensions proposed in the Plan are intended to be developed in ways which will encourage the use of more sustainable means of transport.

0.1.3. The development of arable farmland, which does not necessarily display a great deal of diversity of flora and fauna, need not have a significant impact on biodiversity if implemented with care. Chapter 4 of the RDD contains policies aimed at protecting nature conservation interests and preserving biodiversity. But the details of what developers might be required to do to comply with these policies are matters to be considered at the more detailed planning stage rather than in this Plan.

0.1.4. Government guidance advises against lengthy and over-detailed plans. A satisfactory balance has to be achieved between the need to provide sufficient detail to guide development control decisions, and the need to avoid over-lengthy and inflexible policies. Overall there is no convincing evidence that the balance struck by this Plan is unsatisfactory. The use of SPG (supplementary planning documents or SPD under the LDF system) is supported by government advice as a means of setting out more detailed guidance on the way in which the policies in the Plan will be applied in particular circumstances or areas. If it is prepared in accordance with government advice and following public consultation, it will carry substantial weight in the decision-making process, although it will not have the same status as Local Plan policies. The approach adopted by the City Council in this regard accords with current government advice.

0.1.5. The purpose of policies in the Plan seeking contributions from developers is to conform with the government advice and with Policies in RPG 6 and the Structure Plan, and to ensure that development mitigates its impact on its surroundings. There is no reason in principle why development by the University or Colleges should not be required to do this in the same way that development by any other body would be required to.

0.1.6. Structure Plan Policy P9/2 c specifically requires this Plan to make provision for housing and mixed use development at Cambridge Airport, subject to relocation of the Airport.

0.1.7. The typographical errors referred to in one objection have been corrected in the RDD.

RECOMMENDATION

0.1.8. I recommend no modification to the RDD.

1. INTRODUCTION

1.1 PARAGRAPH 1.1

Objections

The Bursars' Committee of the Cambridge Colleges
Bidwells Property Consultants

87/1/DEP01/01_01
396/2/DEP01/01_01

Summary of Objections

- The policies should make their implications clear in terms of how they will be implemented.
- The Plan must give effect to, and conform with, the Structure Plan.

Inspector's Reasoning and Conclusions

1.1.1. Government guidance advises against lengthy and over detailed plans. Generally speaking, policies in the Plan have concentrated on matters likely to provide the basis for development control decisions, avoiding excessive detail. There is no convincing evidence that the level of detail in the Plan is insufficient.

1.1.2. Generally speaking, policies of the Plan also seek to give effect to the provisions of the Structure Plan, and the Structure Plan authority has issued a certificate of conformity in respect of the RDD.

RECOMMENDATION

1.1.3. I recommend no modification to the RDD.

1.2 PARAGRAPH 1.3

Objections

Turnstone Estates
Dernford (Regent) Ltd

47/1/DEP01/01_03
391/1/DEP01/01_03

Summary of Objections

- The City Centre should be the preferred location for significant trip generating developments.

Inspector's Reasoning and Conclusions

1.2.1. Policy 8/1 requires significant trip generating non-residential proposals to be located in the most suitable place with regard to access by public transport, cycling and walking, and requires preference to be given to more central locations. To make any further comment on the appropriateness of the City Centre as a location for development would merely repeat national policy guidance.

RECOMMENDATION

1.2.2. I recommend no modification to the RDD.

1.3 PARAGRAPH 1.4

Objections

Bidwells Property Consultants
Cambridgeshire County Council

396/3/DEP01/01_04
55/10/DEP02/01_04

Pre-Inquiry Changes: SC1.001

Summary of Objections

- Although the Plan states that it will not seek to reproduce or paraphrase national planning advice, this policy is not followed throughout the Plan.
- The Plan should also refer to Planning Policy Statements.

Inspector's Reasoning and Conclusions

1.3.1. Generally speaking, the Plan should not repeat national policy guidance. However, there are circumstances when it is appropriate, in order to explain the Policy properly, for the Plan to introduce an element of repetition.

1.3.2. The proposed change updates the Plan by including a reference to Planning Policy Statements.

RECOMMENDATION

1.3.3. I recommend that the RDD be modified by the incorporation of SC1.001.

1.4 PARAGRAPHS 1.5-1.7

Objections

NIAB & Others
Stannifer

34/1/DEP02/01_07
775/1/DEP02/01_05
775/10/DEP02/01_07

Summary of Objections

- The Plan should include a provisional housing requirement for the period from 2016 to 2021, based on draft RSS 14.

Inspector's Reasoning and Conclusions

1.4.1. The Plan period extends to 1st July 2016. At the time of writing, RSS 14 is undergoing an examination in public, and the figures in the draft RSS are therefore provisional. However, the land proposed to be released from the Green Belt in this Plan includes a significant reserve of land for the post 2016 period, which will be safeguarded for the period after 2016 if it is not required before that date. It would not be appropriate to make any further provision for the period post-2016 in this Plan.

RECOMMENDATION

1.4.2. I recommend no modification to the RDD.

1.5 PARAGRAPH 1.7

Objections

Summary of Objections

- The Plan does not deal properly with the need to meet the Structure Plan requirement that at least 65% of new houses should be on previously developed land.

Inspector's Reasoning and Conclusions

1.5.1. NIAB has identified an omission in the Plan. Paragraph 1.7 refers to the Structure Plan requirement but the Local Plan does not analyse its land supply against the target. I do not have the evidence to make a recommendation, but I draw the Council's attention to the need to carry out the necessary analysis and take action where appropriate.

1.5.2. The Council in its response relies on the Airport land as a help in meeting the target, but this is not likely to be developed before 2016. This underlines the importance of investigating the situation overall.

RECOMMENDATION

1.5.3.I recommend no modification to the RDD.

1.6 PARAGRAPH 1.9

Objections

Cambridge Preservation Society
Turnstone Estates
Dernford (Regent) Ltd
Bidwells Property Consultants
Windsor Road Residents

26/1/DEP01/01_09
47/2/DEP01/01_09
391/2/DEP01/01_09
396/4/DEP01/01_09
366/1/DEP02/01_09

Summary of Objections

- The meaning of the last sentence of paragraph 1.9 in the FDD is unclear.
- Further progress on the Plan should be delayed until there is a commonality of approach by Cambridgeshire County Council, the City Council and South Cambridgeshire District Council to the urban extensions.
- The timescale and mechanism of the joint working should be specified.

Inspector's Reasoning and Conclusions

1.6.1. The last sentence of paragraph 1.9 in the FDD has been omitted in the RDD.

1.6.2. Some joint working between the relevant local authorities is in progress already. There is no evidence that any of the relevant Councils do not intend this to continue, and in view of the progress that has already been made, there is no justification for delaying the progress of this Plan to allow further discussions between the three planning authorities to take place.

1.6.3. It would not be appropriate to set out in this Plan details of the timescale

and mechanism for the proposed joint working. These are operational matters, and are likely to alter over a relatively short period of time in order to address changing circumstances.

RECOMMENDATION

1.6.4. I recommend no modification to the RDD.

1.7 PARAGRAPH 1.10

Objections

Elaine Wheatley

727/3/DEP02/01_10

Summary of Objections

- Proper consideration needs to be given to infrastructure requirements. Developer contributions alone will not be sufficient.

Inspector's Reasoning and Conclusions

1.7.1. The Plan makes provision for the infrastructure requirements of new development. Whilst developer contributions alone may not be sufficient to provide the necessary infrastructure, it is also likely that financial support will be made available from the Government, as well as through investment by utility providers. There is no convincing evidence that the infrastructure required to support the development provided for in the Plan will not be forthcoming.

RECOMMENDATION

1.7.2. I recommend no modification to the RDD.

1.8 PARAGRAPH 1.11

Objections

Turnstone Estates

47/3/DEP01/01_11

Dernford (Regent) Ltd

391/3/DEP01/01_11

Bidwells Property Consultants

396/5/DEP01/01_11

English Heritage

338/1/DEP02/01_11

Windsor Road Residents

366/2/DEP02/01_11

Summary of Objections

- Greater emphasis should be placed on the role of the City Centre and immediately adjoining areas in accommodating further development.
- There should be no preordained phasing of the release of development sites in advance of joint working with the other authorities involved.
- Paragraph 1.11 should include a reference to protecting and enhancing townscape, landscape and historic character.
- More detail is needed on the criteria to be used in phasing the release of development sites.

Inspector's Reasoning and Conclusions

1.8.1. There is no need for any reference to be made to the City Centre in this paragraph. The importance of developing in sustainable locations is adequately recognised elsewhere in the Plan.

1.8.2. Phasing the release of development sites will be necessary, and it is appropriate for this to be referred to in broad terms in the introduction to the Plan. I say more about the phasing of the Areas of Major Change in Chapter 9.

1.8.3. One of the objectives of Chapter 3 of the Plan is to ensure that development respects, safeguards and enhances the unique character of the City's urban and open areas. The inclusion of a reference in paragraph 1.11 to such matters would add nothing to what is already in Chapter 3.

1.8.4. There is sufficient information in Chapter 9 of the Plan concerning the phasing of development, and it is not necessary to give any further detail in this paragraph.

RECOMMENDATIONS

1.8.5. I recommend no modification to the RDD.

1.9 PARAGRAPHS 1.16 AND 1.17

Objections

Cambridge Preservation Society

26/2/DEP01/01_16
26/3/DEP01/01_17

Summary of Objections

- Paragraphs 1.16 and 1.17 should not be in the draft.

Inspector's Reasoning and Conclusions

1.9.1. These paragraphs explain the consultation that took place leading up to publication of the FDD, and the intended timetable for the adoption of the Plan. Although the information contained in the paragraphs was helpful for the readers of an emerging plan, it is not appropriate for inclusion in the adopted Plan, and the paragraphs should therefore be deleted.

RECOMMENDATIONS

1.9.2. I recommend that the RDD be modified by the deletion of paragraphs 1.16 and 1.17 and the preceding sub-heading.

1.10 PARAGRAPH 1.19

Objections

Windsor Road Residents

366/3/DEP02/01_19

Summary of Objections

- The paragraph should state the mechanisms for community involvement.

Inspector's Reasoning and Conclusions

1.10.1. It is inappropriate to set out details in this Plan as to how the

community will be involved in the Community Strategy.

RECOMMENDATION

1.10.2. I recommend no modification to the RDD.

1.11 PARAGRAPHS 1.20 (FDD) AND 1.21 (RDD)

Objections

Bidwells Property Consultants
Cambridgeshire County Council

396/6/DEP01/01_20
55/12/DEP02/01_21

Pre-Inquiry Changes: SC1.002

Summary of Objections

- The Plan does not comply with the emerging Structure Plan and there has been no joint working with other local authorities. Hence the Plan should be afforded little weight.
- The Cambridgeshire Aggregates (Minerals) Local Plan also forms part of the development plan for Cambridge.

Inspector's Reasoning and Conclusions

1.11.1. Once the Plan is adopted, then it will have the status accorded to it by Section 38 (6) of the Planning and Compulsory Purchase Act 2004. However, all of the contents of paragraph 1.20, other than the reference to the replacement of the 1996 Cambridge Local Plan, will be then be out of date, and so should be deleted from the RDD.

1.11.2. The proposed change inserts a reference to the Cambridgeshire Aggregates (Minerals) Local Plan. The first sentence of paragraph 1.21 should also be modified to reflect the up-to-date situation.

RECOMMENDATION

1.11.3. I recommend that the RDD be modified as follows:

- a) delete paragraph 1.20.**
- b) delete the first sentence of paragraph 1.21 and replace it with: "This Local Plan replaces the Cambridge Local Plan 1996 and forms the most detailed part of the Development Plan for Cambridge.**
- c) incorporate SC1.002.**

1.12 PARAGRAPH 1.24

Objections

The objections to this aspect of the Plan are listed in Annex 3

Summary of Objections

- The status of SPG should be explained.

- All references to SPG should be deleted and any issues intended to be delegated to SPG should be published as part of the local plan process.
- All SPG should give effect to policies in the Plan, and not add to or make policy.
- All SPG should be the subject of full public consultation comparable to that for the Local Plan. The Plan should include a comprehensive list of the SPG, with details of their status and review arrangements. SPG and their background documents should be made widely available.
- Further SPD should relate to the proposed LDF not to the Local Plan.
- There should be an indication of the expected timing of production of further SPD for particular sites and areas to enable development to be brought forward as soon as possible.
- The Plan should stipulate that when SPD is updated, there should be full and effective consultation with local communities.

Inspector's Reasoning and Conclusions

1.12.1. The Council has adopted a number of documents as SPG, to elaborate on policies set out in the 1996 Plan. Open space and car and cycle parking standards have been incorporated in the RDD and have thus been subject to scrutiny through the local plan process. Once the RDD is adopted, other existing SPG will no longer be "linked" to an adopted Plan policy. However, it will continue to be material in making development control decisions; the weight to be attached to it will depend on a number of matters, including its relevance in the light of adopted Plan policies and the level of public consultation to which it was subject. The Council has published details of existing SPG and its status in its Local Development Scheme (CD7.2), as well as its timetable for production of SPD. Including these details in this Plan would amount to unnecessary duplication, and would only add to the length of the Plan.

1.12.2. The use of SPG/SPD to expand on or provide further details of adopted policies accords with advice in both PPG 12 and PPS 12. Furthermore, what is proposed by the Council in the RDD does not in principle conflict with that advice. PPS 12 explains the functions of SPD, and the Council will need to have regard to that advice when it prepares its SPD. But there is no need to repeat that advice in the Plan. Details of the consultation to which SPD will be subject must be set out in the Council's Statement of Community Involvement, which itself will be subject to independent scrutiny. The RDD highlights areas where SPD will be needed. It is not necessary to duplicate in the RDD details as to timing and consultation which will appear in other documents.

RECOMMENDATION

1.12.3. I recommend no modification to the RDD.

2. VISION AND STRATEGY

2.1 WHOLE CHAPTER

Objections

The Perse School For Boys
Dr. J.I. Coates

754/1/DEP02/02
790/1/DEP02/02

Summary of Objections

- The role of the independent education sector should be recognised.
- The numbers of people and vehicles in the City should be reduced.

Inspector's Reasoning and Conclusions

2.1.1. Regional guidance and the Structure Plan require the City to accommodate growth. In the interests of conciseness, there should be no reference to the independent education sector in the Vision and Strategy.

RECOMMENDATION

2.1.2. I recommend no modification to the RDD.

2.2 PARAGRAPH 2.1

Objections

Cambridge Preservation Society
Cambridgeshire County Council
Cambridge Urban Forum
Trumpington Environmental Action Group (TEAG)
South Cambridgeshire District Council
English Heritage
Trumpington Environmental Action Group (TEAG)
James Greyson
Anne Campbell

26/4/DEP01/02_01
55/9/DEP01/02_01
322/1/DEP01/02_01
460/3/DEP01/02_01
461/1/DEP01/02_01
338/2/DEP02/02_01
460/1/DEP02/02_01
572/1/DEP02/02_01
768/1/DEP02/02_01

Summary of Objections

- The Vision should be restated or modified.
- Parts of the Vision are unclear. There are misleading references to sustainability, and a failure to recognise the conflict between a compact City and further development.
- The Vision should be strengthened by stating it as a policy, or minimising the need to travel, or bringing out the importance of green corridors.
- Without further work on TAs it is impossible to say whether development proposals will in fact go ahead. A back-up strategy is needed.

Inspector's Reasoning and Conclusions

2.2.1. A succinct Vision cannot refer to all objectives and elements of the Plan's Strategy. There are suitable references elsewhere in the Plan to green corridors (for example in the Spatial Strategy) and to travel issues (for example in the relevant objectives). The use of the term 'sustainability' is appropriate, in the

context of guiding development and promoting more sustainable living patterns. Growth does not necessarily prevent a city from being compact. The first sentence of the paragraph means what it says and is not inaccurate.

2.2.2. Generally the restatements of the Vision, and suggested modifications, are not improvements on the draft Plan. There is no need for the Vision to be a Policy. It would not be used directly in development control and does not contain site specific proposals. However Cambridge is not afforded the status of a Regional centre in the adopted parts of the development plan: it is a Sub-Regional centre.

2.2.3. The Structure Plan requirements have been arrived at in the context of a strategic consideration of transport issues. That Plan names areas for development against the background of a specific housing requirement. There has been a review of the Green Belt. The development plan can be reviewed and altered if necessary, in the light of more detailed analysis of the housing capacities of development proposals.

RECOMMENDATION

2.2.4. I recommend that the RDD be modified by the deletion of "Regional and" from the third sentence of paragraph 2.1.

2.3 PARAGRAPH 2.2

Objections

The Bursars' Committee Of The Cambridge Colleges
English Heritage
The Rail For Cambridge Movement
Cambridgeshire County Council

87/4/DEP01/02_02
338/1/DEP01/02_02
583/1/DEP01/02_02
55/14/DEP02/02_02
55/15/DEP02/02_02
55/16/DEP02/02_02
338/3/DEP02/02_02
338/4/DEP02/02_02
366/5/DEP02/02_02

English Heritage

Windsor Road Residents

Summary of Objections

- The topic of higher and further education should be the subject of a separate chapter giving proper treatment of the University of Cambridge and the Colleges.
- The Strategy should refer to climate change, and the references to conservation should be expanded. There are environmental limits to the outward growth of the City.
- Sustainability is relevant to all development, not merely to Areas of Major Change.
- Monitoring and enforcement of planning obligations should be detailed here.
- The plan should support a rail bypass from Northstowe to Cambridge, and should safeguard land for a railway station at Addenbrooke's Hospital.

Inspector's Reasoning and Conclusions

2.3.1. Government advice on plan preparation is that development plans should be kept as succinct as possible. Given the importance of higher and further education to the local economy, there is logic in the Council's approach in the RDD of linking the topic with working in Cambridge, and the link also gives the opportunity to reduce the size of the plan. The significance of the education sector both locally

and nationally, which is fully recognised in the Plan, is not undermined by this approach.

2.3.2. In my view the Local Plan will need to await the consideration of climate change at a more strategic level before it can deal specifically with the topic, but the Plan does contain relevant provisions reflecting national and regional concerns. The amount of growth has been set by the Structure Plan in many ways. The Areas of Major Change are the principal elements of change, to which sustainability considerations are important.

2.3.3. Nature conservation and the conservation of other features of value are covered in other parts of the Plan. Monitoring of planning obligations, and penalties for non-compliance, are not matters suitable for the Local Plan.

2.3.4. The rail bypass suggested in one objection would follow the line of the former Cambridge - St Ives railway line, which under the RDD is safeguarded for public transport purposes under policy 8/8. At the time of writing, the intention is that this should be the route of the Cambridge Guided Bus (CGB), which is being promoted by the County Council. This is the subject of a separate statutory approval process and is outside the remit of this Plan. The City Council is not the authority that would implement a proposal of the type supported in the objection, and there is no evidence that any of the relevant transport bodies has any proposals to introduce a rail bypass. For that reason, it would not be appropriate for this Plan to give it support. However, the route will remain safeguarded whether or not the CGB scheme goes ahead, and there is therefore nothing in this Plan that would prejudice the provision of a rail bypass, were the intentions of the relevant body to change.

2.3.5. Although Policy P8/10 of the Structure Plan includes Addenbrooke's rail station as a local scheme, the CGB is intended to serve Addenbrooke's. The station is not included in the County Council's Local Transport Plan, and there is no evidence either that such a station would be feasible or that there is any intention on the part of the relevant authorities to construct a station within the plan period. A safeguarding policy would not therefore be appropriate. However, it appears that the land that would be required for the station would lie within the green corridor proposed as part of the Southern Fringe development, and it is unlikely that any development that might prejudice the construction of such a station in the future would be supported under the policies of the RDD.

RECOMMENDATION

2.3.6. I recommend no modification to the RDD.

2.4 PARAGRAPH 2.3.1 (FDD)

Objections

Transport 2000 Cambridgeshire & West Suffolk

374/1/DEP01/02_031

Summary of Objections

- There should be a statement of the need to improve the efficiency of public transport including taxis in the central and station areas.

Inspector's Reasoning and Conclusions

2.4.1. The matters raised in the objection relate to the management of public

transport, including taxis, which are not appropriate matters to include in the Local Plan as they have no direct land use implications.

RECOMMENDATION

2.4.2. I recommend no modification to the RDD.

2.5 PARAGRAPH 2.4

Objections

Taylor Woodrow Developments Limited

2/1/DEP02/02_04

Summary of Objections

- The Areas of Major Change will not accommodate all the development required, especially as there is no alternative location for the Airport and no replacement site for the development proposed for the Airport.

Inspector's Reasoning and Conclusions

2.5.1. The Plan is capable of fulfilling the Structure Plan housing requirement. An alternative location for Cambridge Airport is being sought, and in any case the Airport site is not relied upon to provide housing completions during the Plan period, although it will be available for longer term development. Although there may be a shortfall of employment land if the Airport site does not come forward during the Plan period, the Council can monitor the situation, and carry out corrective action if necessary. There is no need at this time for the identification of any other Areas of Major Change or similar.

RECOMMENDATION

2.5.2. I recommend no modification to the RDD.

2.6 PARAGRAPH 2.3.2 (FDD)

Objections

Transport 2000 Cambridgeshire & West Suffolk
Domaine Developments

374/18/DEP01/02_032
435/2/DEP01/02_032

Summary of Objections

- The range of destinations served by bus should be improved.
- Insert a statement permitting development in advance of the approval of further guidance.

Inspector's Reasoning and Conclusions

2.6.1. The range of destinations served by bus is a matter for the commercial bus operators, and to a limited extent, for the County Council as local transport authority. The Local Plan cannot dictate the extent of bus services within the city, and the modification sought would therefore be inappropriate.

2.6.2. The question of early development and further guidance is dealt with in Chapter 9 of the Plan, and I consider it in the corresponding section of this report. Limited development might be permitted in some circumstances, but the scale and complexity of Areas of Major Change is such that further guidance will generally be

required before substantive development takes place. Structure Plan Policy P9/2c requires Master Plans or Design Frameworks to be prepared for all individual sites to be released from the Green Belt.

RECOMMENDATION

2.6.3. I recommend no modification to the RDD.

2.7 PARAGRAPH 2.3.3 (FDD)

Objections

Taylor Woodrow Developments Limited	2/10/DEP01/02_033
Mr & Mrs J. M. Brookes	257/1/DEP01/02_033
Arlington Securities Plc	369/4/DEP01/02_033
Transport 2000 Cambridgeshire & West Suffolk	374/2/DEP01/02_033
GO-East	383/5/DEP01/02_033
Bidwells Property Consultants	396/8/DEP01/02_033
Addenbrooke's NHS Trust	399/1/DEP01/02_033
	399/2/DEP01/02_033

Summary of Objections

- Other development areas should be identified to make up for uncertainties surrounding the availability of Areas of Major Change.
- The development land allocations afforded by the release of land from the Green Belt are insufficient to meet the employment objectives of the plan, and the plan should therefore consider other opportunities for the location of employment land.
- Trumpington should/should not receive consideration for more development.
- Areas of Major Change should be the subject of more, or different, references to transport. The paragraph is confusing as to its status or contents.

Inspector's Reasoning and Conclusions

2.7.1. I deal with the question of the adequacy of employment provision in chapter 7 of this report. As I conclude there that no further releases of land from the Green Belt would be justified at this stage, there is no need to modify this paragraph in that regard.

2.7.2. The first objection is considered above in section 2.5. Work consequent upon the preparation of the Structure Plan does not identify land west of Trumpington Road for development, but the Structure Plan does require some development east and south-east of Trumpington. The Structure Plan identifies 3 of the Areas of Major Change as strategic employment locations and others can be identified for employment development in the Local Plan. The allocation of land for development is to meet requirements for growth rather than to expedite the provision of a rapid transit system. No agency proposes to provide such a system for the area between Huntingdon Road and Madingley Road, but the transport requirements of this development will be assessed. The Local Plan must make provision for land release in this area, in line with Structure Plan Policy P9/2c.

2.7.3. There is no need for the paragraph to be a Policy; it is part of the Spatial Strategy, and the Policies and Proposals to support the Strategy are elsewhere in the Plan. The references to the Areas of Major Change as mixed use centres and to the connections between them are appropriate. The error in the second sentence of what is now paragraph 2.7 has been corrected in the RDD. I support the wording

used in this draft.

RECOMMENDATION

2.7.4. I recommend no modification to the RDD.

2.8 PARAGRAPH 2.6

Objections

Anglian Water Services Limited

782/1/DEP02/02_06

Pre-Inquiry Changes: SC2.001

Summary of Objections

- The plan should make it clear that the relocation of the Waste Water Treatment Works (WWTW) off-site is necessary to enable a high-density mixed use development to proceed.

Inspector's Reasoning and Conclusions

2.8.1. The Council proposes a change to paragraph 2.6 of the plan, to acknowledge that the Northern Fringe development will require the relocation of the WWTW to a new site. This addresses the objection, and I support it as a more accurate reflection of the situation.

RECOMMENDATION

2.8.2. I recommend that the RDD be modified by the incorporation of SC2.001.

2.9 PARAGRAPH 2.7

Objections

Dr. Peter G.I. Stovin
Addenbrooke's NHS Trust
Countryside Properties/Liberty Property Trust

287/1/DEP02/02_07
399/1/DEP02/02_07
837/1/DEP02/02_07

Summary of Objections

- Addenbrooke's Hospital should expand on a site elsewhere in Cambridge.
- The range of uses allowable adjacent to the Hospital should be extended to include commercial research facilities.

Pre-Inquiry Changes: SC2.002

Inspector's Reasoning and Conclusions

2.9.1. The Structure Plan requires the release of land south and west of the Hospital. There is no evidence that the Hospital could or would be able to expand on a different site.

2.9.2. Policy 9/5 is the relevant one for controlling uses near Addenbrooke's. Chapter 2 is more general in purpose and does not need to repeat the Policy in detail. However the Council is proposing a useful change to expand on paragraph 2.7.

RECOMMENDATION

2.9.3. I recommend that the RDD be modified by the incorporation of SC2.002.

2.10 PARAGRAPH 2.8

Objections

English Heritage
Ashwell (Barton Road) Limited

338/5/DEP02/02_08
659/1/DEP02/02_08

Summary of Objections

- Release of land from the Green Belt is necessary where there are exceptional circumstances. This paragraph suggests a different process where need is demonstrated later.
- The allocation for housing of land to the north of Barton Road is sought, and a consequential amendment will be required to paragraph 2.8.

Inspector's Reasoning and Conclusions

2.10.1. Paragraph 2.8 reflects and is entirely consistent with the requirements of Policy P9/2 c of the Structure Plan.

2.10.2. I have concluded elsewhere in this report that land north of Barton Road should not be allocated for housing (see Chapter 5 below). There is therefore no need for any consequential amendment to paragraph 2.8.

RECOMMENDATION

2.10.3. I recommend no modification to the RDD.

2.11 PARAGRAPH 2.9

Objections

Councillor James Quinlan
Cllr John Durrant

751/4/DEP02/02_09
838/5/DEP02/02_09

Summary of Objections

- The proposals for Marshall's and the Airport should be deleted, as it is unlikely that an environmentally acceptable alternative site can be found for the Airport.
- As the choice of the new site for Marshall Aerospace and Cambridge Airport will be dependant upon other local authorities and may be impossible to achieve, the plan should acknowledge that the closure of Marshall's and Cambridge Airport will also achieve the aim of freeing the Airport for redevelopment

Inspector's Reasoning and Conclusions

2.11.1. Structure Plan policy P9/2 c specifically requires this Plan to make provision for housing and mixed use development at Cambridge Airport, subject to relocation of the Airport. There is therefore no justification for deleting the proposals for the Airport from the Plan.

2.11.2. The Council has indicated that it is actively working with Marshall of Cambridge and other local authorities to achieve the relocation of Marshall Aerospace and the Airport. It would not therefore be accurate to modify the plan to imply that the Council seeks the closure of the Airport.

RECOMMENDATION

2.11.3. I recommend no modification to the RDD.

2.12 PARAGRAPH 2.10

Objections

NIAB & Others

34/2/DEP02/02_10

Summary of Objections

- The term 'green corridor' should be defined.

Inspector's Reasoning and Conclusions

2.12.1. There is no necessity for a definition as the meaning of the term is sufficiently clear from the wording of the relevant sentence, the content of Figure 1, and material elsewhere in the Plan. The Council's evidence is that the phrase has been used for many years in Cambridge.

RECOMMENDATION

2.12.2. I recommend no modification to the RDD.

2.13 PARAGRAPH 2.3.5

Objections

Bidwells Property Consultants

396/9/DEP01/02_035

Summary of Objections

- The terms 'green corridor' and 'retained landscape' are unclear, as are the Plan's proposals for the latter.

Inspector's Reasoning and Conclusions

2.13.1. See above for conclusions regarding green corridors. However the phrase 'retained landscape' is obscure. It refers to the landscape which would remain after the development of the Areas of Major Change. A more understandable construction should be used in the relevant sentence of what is now paragraph 2.11 in the RDD.

2.13.2. The Spatial Strategy is not the place to explain proposals with regard to the open land associated with Areas of Major Change, as the proposals will differ depending on the area.

RECOMMENDATION

2.13.3. I recommend that the RDD be modified by the deletion of the second sentence of paragraph 2.11 and its replacement as follows:

Where major new developments are allowed on the edge of Cambridge, some open land and landscape features will be retained in association with the development. The Plan will ensure that the value and accessibility of this retained landscape will be improved as an integral part of the development strategy.

2.14 FIGURE 1

Objections

The objections to this aspect of the plan are listed in Annex 3.

Pre-Inquiry Changes: SC2.003

Summary of Objections

- Land release outside the City for University development should be shown. A station at Addenbrooke's Hospital should be included.
- Proposals outside the Council's administrative boundary should not be shown. Areas beyond the boundary should be shown differently from the City's area.
- The Figure is so diagrammatic as to be of little use. It conflicts with the Proposals Map/Structure Plan.
- Development south of Teversham is shown, incorrectly.

Inspector's Reasoning and Conclusions

2.14.1. The Figure has been enlarged in the RDD, and is much clearer than in the previous draft. The status of the Figure is explained.

2.14.2. In my opinion there is no disadvantage in showing, on an illustrative plan, proposed development outside the City boundary, provided the proposal is sufficiently firm, and accurately shown. Indeed all proposals included in the Figure should be shown as accurately as possible in relation to other major features on the Figure, such as railways and important roads. To distinguish proposals which are outside the City from those inside the City boundary, the Council proposes a change to indicate areas outside the boundary in a lighter tone. This is a change I support.

2.14.3. No evidence is provided of any conflict with the Structure Plan. There are however apparent differences from the Proposals Map. In order to avoid a misleading impression the proposed area for development at Addenbrooke's should extend to the west as far as the active railway line. The Council agrees that development should not be shown east of Airport Way south of Teversham. The Council points out that there are other areas where the general portrayal of proposals appears to introduce differences from the Proposals Map. Given the limited number of Areas of Major Change it should be a simple matter to redraw boundaries to accord with major features on the Figure.

2.14.4. On the other hand I do not support the inclusion in the Figure of a station at Addenbrooke's. A guided bus system is proposed, and no party or agency with the necessary responsibility is planning the provision of a railway station.

2.14.5. I deal in Chapter 9 of this report with the objections by Cambridge University to the Plan's proposals for the area between Madingley Road and Huntingdon Road. As South Cambridgeshire District Council is not committed to

development on its side of the boundary with the City, no development proposals should be shown outside the City. However South Cambridgeshire District Council is working jointly with the City Council on a cross-boundary AAP for the area, and Figure 1 should, as the City Council agrees, indicate that the Area of Major Change for the locality extends into South Cambridgeshire. My other conclusions in Chapter 9 also lead to recommendations to extend the Area of Major Change within the City up to Madingley Road and the M11.

2.14.6.I agree with the University that, as the Figure is purely a schematic diagram, there should be no scale. There is no scale on the RDD version.

RECOMMENDATION

2.14.7. I recommend that the RDD be modified as follows:

- a) by the incorporation of SC2.003.**
- b) by the incorporation of FPC5 and FPC21.**
- c) by the accurate portrayal of the Areas of Major Change in relation to major features like railways and important roads, and in order to correspond with the boundaries shown on the Proposals Map.**
- d) By the inclusion in the Area of Major Change notation of the land up to the M11 and Madingley Road in the Area of Major Change for the Madingley Road/Huntingdon Road area.**

3.1 DESIGNING CAMBRIDGE

Objections

Taylor Woodrow Developments Limited
D. Edgar

2/15/DEP01/03
22/2/DEP01/03

Summary of Objections

- Reference to safeguarding of land post 2016 in accordance with PPG2 should be included.
- The requirements of policing activities should be incorporated.

Inspector's Reasoning and Conclusions

3.1.1. The question of safeguarded land is dealt with in Chapter 4 of this report.

3.1.2. Policing activities are not controllable through the Local Plan as they do not relate directly to a land use planning matter. I note that Policy 3/7 in its various references to design and layout, such as in encouraging natural surveillance at clause (d), gives appropriate consideration to the issue of crime within a land use context. Therefore omission from the Plan of specific reference to policing is justified and no amendment is required.

RECOMMENDATION

3.1.3.I recommend no modification to the RDD.

3.2 PARAGRAPH 3.5

Objections

GO-East

383/7/DEP01/03_05

Summary of Objections

- This introductory material might be better located in the Spatial Strategy.

Inspector's Reasoning and Conclusions

3.2.1. This paragraph has been changed significantly since the First Deposit Draft. There is now a suitable cross-reference to the Areas of Major Change Chapter.

RECOMMENDATION

3.2.2.I recommend no modification to the RDD.

3.3 POLICY 3/1

Objections

Cambridge Preservation Society	26/7/DEP01/03_P01
Camstead Homes	74/2/DEP01/03_P01
Cambridge Urban Forum	322/3/DEP01/03_P01
The House Builders Federation	362/1/DEP01/03_P01
James Development Co. Ltd.	378/2/DEP01/03_P01
The House Builders Federation	362/1/DEP02/03_P01
Windsor Road Residents	366/7/DEP02/03_P01
Sohnius And Perry Ltd	784/1/DEP02/03_P01

Summary of Objections

- The Policy is over-restrictive and would discourage development.
- The requirements of the Policy should be extended to all applications and be strictly enforced.
- Clearer wording is sought.

Inspector's Reasoning and Conclusions

3.3.1. The Policy and supporting text have been rewritten since the FDD, thus meeting several of the objections. Only major development (which is defined in paragraph 3.7) has to be accompanied by a sustainability checklist and statement. However it is reasonable to require development in general to be sustainable. Reducing the use of energy is not merely the province of the Building Regulations.

3.3.2. Although the Council intends that all planning applications must meet the principles of sustainable development, the inclusion in the Policy of the qualifying phrase "as appropriate to its scale, location and form" could lead some parties to believe that certain types of development, for example small residential refurbishments, do not need to. In my opinion the qualifying phrase should be removed from the Policy. Sustainability is important and the Policy should avoid giving rise to doubt.

3.3.3. As for the sustainability statement and small development, it is the sustainability checklist which details how proposals achieve sustainable development objectives. The statement is merely intended to highlight key issues already identified on the checklist. Hence a sustainability statement alone does not show that a development is sustainable, and it would be onerous to require proponents of small developments to prepare both a statement and a checklist. The Policy should not require small developments to be accompanied by a statement. It already requires this of major developments, and most of the Plan's allocations would be categorised as major developments. The checklists are used to assist in making a decision on planning merits, and are not used to the exclusion of other material considerations.

3.3.4. SUDS are dealt with elsewhere in the Plan. The Local Plan is not the place to set out penalties for failing to comply with requirements.

RECOMMENDATION

3.3.5.I recommend that the RDD be modified by rewording the first paragraph of Policy 3/1 to read "Development will be permitted if it meets the principles of sustainability."

3.4 PARAGRAPH 3.6

Objections

The objections to this aspect of the Plan are listed in Annex 3.

Pre-Inquiry Change: SC3.001

Summary of Objections

- Specific commitment to reducing the need to travel should be made, and priority given to sites well served by public transport, but private car use should be allowed for in certain circumstances.
- More detailed commitment to storage of separated waste should be included.
- The objectives to maximize environmental, social and economic aims are in conflict as stated.
- The historic environment and archaeological heritage should be given greater recognition.
- The aspirations of the Policy will be costly to implement and might be incompatible with the development proposed in the Plan.
- The method by which brownfield land is to be prioritised is queried.
- The aspiration to preserve water should be the subject of further explanation.
- Clause (i) should seek to encourage high densities rather than setting a minimum acceptable level of 30dph. Density should be strictly controlled.
- The importance of SUDS and flood risk assessment should be emphasised.
- Use of sustainability checklists to determine planning applications is opposed.
- Energy conservation is a matter for consideration under Building Regulations.
- The inclusion of examples from supplementary guidance is unnecessary.

Inspector's Reasoning and Conclusions

3.4.1. The addition of specific reference to reducing the need to travel at clause (f) of the RDD supersedes the travel related clause at FDD stage. This overcomes the concern of the County Council by including a specific commitment to lower travel demand. Furthermore the insertion of a new clause (c) to highlight the needs of the historic environment overcomes the concerns of English Heritage and is similarly in line with the Sustainable Development Guidelines.

3.4.2. The inclusion of detail about storage space for separated waste is not appropriate in this Policy. The issue is covered in adequate detail in the Housing Development Design Guide and the Sustainable Development Guidelines.

3.4.3. Whilst it is true that environmental, social and economic factors will often be in conflict, it is necessary for the planning process to resolve these. It is right that the Plan should include policies aimed at promoting sustainable development, requiring economic and social factors to be considered alongside environmental factors. The Sustainable Development Guidelines assist in this process.

3.4.4. The financing of public transport is not a land use matter. 3.6(h) has, in any event, been deleted.

3.4.5. Whilst proximity to public transport is an important consideration it is only one relevant factor. Consequently I am content for clause (f) to reaffirm a general commitment to reducing the need to travel and additional reference to the needs of private car users is unnecessary.

3.4.6. The Policy states that building should be at densities of at least 30

dwellings per hectare net, and higher where appropriate. There is thus Policy backing for higher densities at appropriate locations. Giving priority to development of brownfield land is in accordance with national policy, and I support the Pre-Inquiry Change which reinstates such a reference (see also paragraph 5.3.2 of this report).

3.4.7. The need to reduce the use of water in development is combined with the need to conserve natural resources more generally at clause (a). However, the examples of best practice sought are already detailed elsewhere within the Sustainable Development Guidelines and it is not necessary to include them with the examples given in the list contained at paragraph 3.6.

3.4.8. Despite the removal of FDD clause (d), I am satisfied that matters relating to flood risks and SUDS are adequately dealt with elsewhere, specifically at Chapters 4 and 5. The Plan is clear in that the list only provides examples of the means by which development can become more sustainable as per the Cambridge Sustainable Development Guidelines.

3.4.9. Whilst acknowledging concerns about densities of development, the threshold identified at clause (b) is consistent with both national guidance contained within PPG3 and the advice of the Council's own design guide and can therefore remain.

3.4.10. I note the companion guide to PPS22 acknowledges that Passive Solar Design, to which the Council refers as a means of reducing energy consumption is specifically noted as a normal planning matter. I therefore consider this justifies the inclusion of the example at clause (a), which refers to energy efficiency.

RECOMMENDATION

3.4.11. I recommend that the RDD be modified by the incorporation of SC3.001.

3.5 PARAGRAPH 3.7 (FDD)

Objections

The House Builders Federation

362/27/DEP01/03_07

Summary of Objections

- The requirements for development are excessive and attempt to tackle issues that are too wide ranging.

Inspector's Reasoning and Conclusions

3.5.1. FDD paragraph 3.7 has been deleted, and the Policy has been clarified and restricted in its application to major development as defined at RDD paragraph 3.7, thus overcoming the objection.

RECOMMENDATION

3.5.2.I recommend no modification of the RDD.

3.6 PARAGRAPH 3.8 (FDD)

Objections

The House Builders Federation

362/28/DEP01/03_08

Summary of Objections

- The meaning and operation of policy for development on the urban edge should not be delegated to SPG.

Inspector's Reasoning and Conclusions

3.6.1. I am satisfied that the deletion of FDD paragraph 3.8 together with reworded paragraph 3.6 at RDD stage makes it clear that the Cambridge Sustainable Development Guidelines are a useful source of guidance and information only. The Plan does not therefore delegate matters more appropriately contained within it.

RECOMMENDATION

3.6.2.I recommend no modification of the RDD.

3.7 PARAGRAPH 3.7

Objections

Turnstone Estates

47/11/DEP02/03_07

Cambridgeshire County Council

55/20/DEP02/03_07

The House Builders Federation

362/15/DEP02/03_07

Addenbrooke's NHS Trust

399/3/DEP02/03_07

Sohnius And Perry Ltd

784/6/DEP02/03_07

Countryside Properties/Liberty Property Trust

837/2/DEP02/03_07

Summary of Objections

- The Policy should contain reference to Structure Plan requirements for development to take place on previously developed land.
- The thresholds for housing numbers and gross floor area that define major development should be set at higher levels.
- Policy 3/1 should apply not only to "major development".

Inspector's Reasoning and Conclusions

3.7.1. The definition used here is in accord with the definition set out in Article 8 of the Town and Country Planning General Permitted Development Order 1995. It is the appropriate definition to be used in the context of policy relating to sustainable development and the preparation of a sustainability statement. Whilst it is desirable for all definitions within the Plan to be consistent, that in paragraph 7.15 relates to a different matter, dealing specifically with small-scale warehousing developments. In this context the figure 1,850 square metres is drawn from work relating to the selective management of the economy of Cambridge, and reflects the figure given in Structure Plan paragraph 9.54, supporting Policy P9/7. No modification is justified.

3.7.2. Similarly as indicated in the Council response, there is little value in repeating the provisions of the Structure Plan target for development on previously developed land. I note also that this target is introduced elsewhere in paragraph

1.7 of Chapter One in setting the context for the Plan's policy choices and should be restricted to this reference in the interest of conciseness.

3.7.3. I deal above with the Sohnius and Perry objection.

RECOMMENDATION

3.7.4.I recommend no modification to the RDD.

3.8 POLICY 3/4 (FDD)

Objections

Cambridge Preservation Society	26/8/DEP01/03_P04
Cambridgeshire County Council	55/68/DEP01/03_P04
Countryside Properties	68/9/DEP01/03_P04
English Heritage	338/4/DEP01/03_P04
Windsor Road Residents	366/5/DEP01/03_P04
South Cambridgeshire District Council	461/12/DEP01/03_P04

Summary of Objections

- The Policy should be strengthened with the addition of "only" after "will".
- Linkages to the objectives of the Cambridge Green Belt should also be made.
- Encouragement to improving accessibility to the countryside and use of the public rights of way network should be included here.
- "Connectivity" should be added after "biodiversity and amenity of the urban edge".
- Stronger wording should be included here and in paragraph 3.16 to ensure necessary measures are in place prior to development.
- Further details of the character and setting of Cambridge the Plan seeks to conserve or enhance should be included in the supporting text and reference to appropriate supplementary guidance made.

Inspector's Reasoning and Conclusions

3.8.1. In response to various objectors, Policy 3/4 has been amended at RDD by the insertion of the word "only" after "will" to specify the criteria, thus overcoming any concerns about the strength of the Policy. Similarly, whilst not explicitly referred to in the reworded Policy as not all urban edges are within the Green Belt, the RDD also contains expanded supporting text explaining the role of the Cambridge Green Belt in the context of the Policy.

3.8.2. I am satisfied that the reworded Policy deals with access to the countryside and to footpaths, by additional reference to improved connectivity on the urban edge. The addition also addresses the detailed concern of Countryside Properties in requesting this specific wording.

3.8.3. I consider that the revisions in the RDD and the proposed change SC3.002 to paragraph 3.8 meet the objection concerned with detailing the character and setting of Cambridge.

3.8.4. Policy and supporting text concerning the setting of the City have been strengthened in the RDD. This is not the place to deal with monitoring, enforcement, and penalties for non-compliance. The programming of development

with any mitigation measures will generally be a matter for more detailed planning.

RECOMMENDATION

3.8.5.I recommend no modification to the RDD.

3.9 POLICY 3/2

Objections

Cambridgeshire County Council

55/18/DEP02/03_P02

Summary of Objections

- Policy and supporting text should give more emphasis to the use of public rights of way networks and improving access to the countryside from the urban edge.

Inspector's Reasoning and Conclusions

3.9.1. The Policy includes mention of "connectivity" whilst paragraph 3.8 explicitly refers to "improved public accessibility" on the urban edge. I see no reason to give any greater emphasis.

RECOMMENDATION

3.9.2.I recommend no modification to the RDD.

3.10 PARAGRAPH 3.16 (FDD)

Objections

Countryside Properties

68/10/DEP01/03_16

Summary of Objections

- Inclusion of "where practical" is requested after "construction works".

Inspector's Reasoning and Conclusions

3.10.1. Renumbered paragraph 3.8 at RDD appropriately seeks planting in advance of construction works where this is considered to be beneficial to its surroundings. I agree that where advance planting is not possible this will be taken as a material consideration in deciding an application, therefore the expanded wording proposed is unnecessary.

RECOMMENDATION

3.10.2. I recommend no modification to the RDD.

3.11 PARAGRAPH 3.8

Objections

Pre-Inquiry Changes: SC3.002

Land Securities

37/1/DEP04/03_08

Summary of Objections

- The proposed change refers to historic landscape characterisation work which has not yet been completed.

Inspector's Reasoning and Conclusions

3.11.1. The landscape work to which reference is made is a material consideration which ought to influence development proposals. Even if the landscape work is not yet complete, it seems to me likely that the Local Plan will be in force for a significant period after the substantial completion of the landscape work. Consequently I expect the work should be useful in the preparation and assessment of proposals.

RECOMMENDATION

3.11.2. I recommend that the RDD be modified by the incorporation of SC3.002.

3.12 POLICY 5/1 (FDD)

Objections

BT Plc

376/4/DEP01/05_P01

Summary of Objections

- Inclusion of "protects or" is requested before "enhances the distinctive character..." along with deletion of the words "respects and" from the text.

Inspector's Reasoning and Conclusions

3.12.1. This Policy is now 3/3 in the RDD. PPG 15 states the emphasis is on both protecting and enhancement. Further, I do not agree that "respects and" should be replaced by "protects or" since development should respect, i.e. take reference from, its surroundings.

RECOMMENDATION

3.12.2. I recommend no modification to the RDD.

3.13 POLICY 3/3

Objections

Peter Convey

766/1/DEP02/03_P03

Summary of Objections

- Specific mention of the River Cam is sought as an area contained in the Cambridge Landscape Character Assessment.

- Commitment to control moorings should be included.
- Where appropriate additional mooring facilities should be promoted.

Inspector's Reasoning and Conclusions

3.13.1. Specific mention of the River Cam is appropriately contained elsewhere within the supporting text to Policy 3/9 and an additional reference is unnecessary here. The River is also a County Wildlife Site and is referred to in the Cambridge Landscape Character Assessment.

3.13.2. The control of existing mooring activity is not generally a land use planning matter to be controlled through the provisions of the Local Plan. However, elsewhere at Policy 3/9, additional recreational activity on the waterways is encouraged depending on the associated environmental impact. Any mooring proposals that come forward as land use matters can be considered adequately against this Policy. I recommend below additional mooring facilities off Fen Road.

RECOMMENDATION

3.13.3. I recommend no modification of the RDD.

3.14 PARAGRAPH 3.9

Objections

Pre-Inquiry Changes: SC3.003

Land Securities

37/2/DEP04/03_09

Summary of Objections

- The proposed change refers to historic landscape characterisation work which has not yet been completed.

Inspector's Reasoning and Conclusions

3.14.1. My reasoning and conclusions are given above under Plan reference paragraph 3.8.

RECOMMENDATION

3.14.2. I recommend that the RDD be modified by the incorporation of SC3.003.

3.15 POLICY 3/5 (FDD)

Objections

Cambridge Preservation Society
Cambridge Urban Forum
Laing Homes North Thames

26/9/DEP01/03_P05
322/4/DEP01/03_P05
380/8/DEP01/03_P05

Summary of Objections

- The Policy should indicate that the heritage of Cambridge is an essential part of its character.
- Development of exceptional design or significance should not necessarily be required to mimic the existing built environment.
- The need to achieve development that adequately respects local characteristics should be balanced against the need to make best use of available land.

Inspector's Reasoning and Conclusions

3.15.1. I consider that the Policy requiring that developments demonstrate that they have responded to their context and have drawn inspiration from the key characteristics of their surroundings is adequate. The addition of an opening sentence "The City's heritage is an essential part of its character" might be taken to imply that areas outside the historic core are not of interest, or that contextual designs are the only appropriate forms of development in the City.

3.15.2. Paragraph 3.11 makes it clear that the Policy does not require pastiche designs for new development since it includes reference to new and distinctive character.

3.15.3. Again, in relation to the final objection, paragraph 3.11 allows for creation of new character and acknowledges that there are areas of weak character. This is a positive Policy so that if an applicant meets the tests, approval will be forthcoming.

RECOMMENDATION

3.15.4. I recommend no modification of the RDD.

3.16 PARAGRAPH 3.17 (FDD)

Objections

English Heritage

338/5/DEP01/03_17

Summary of Objections

- A variety and quality of materials appropriate to the differing localities in Cambridge should be encouraged.

Inspector's Reasoning and Conclusions

3.16.1. Renumbered paragraph 3.10 of the RDD Plan has been amended with the addition of a reference to the variety of building materials which help identify the various "character" areas of the City. This change will help provide the additional encouragement the objector seeks for the use of appropriate building materials. No further amendment is required.

RECOMMENDATION

3.16.2. I recommend no modification of the RDD.

3.17 POLICY 3/6 (FDD)

Objections

Countryside Properties
Cambridge Urban Forum
Bidwells Property Consultants

68/11/DEP01/03_P06
322/5/DEP01/03_P06
396/14/DEP01/03_P06

Summary of Objections

- The requirement at clause (b) that "...non-residential development include some residential development" is inappropriate.
- The Policy fails to encourage mixed use development.
- Clarification as to the purpose of the Policy is required or it should be removed.

Inspector's Reasoning and Conclusions

3.17.1. The requirement complained of has been omitted from the RDD. Mixed use development, and therefore residential accommodation, may not be appropriate at all sites.

3.17.2. With the changes made in the RDD version of the Plan I consider that the Policy is clear as to its purpose, which the supporting text reinforces. There is a positive approach.

RECOMMENDATION

3.17.3. I recommend no modification to the RDD.

3.18 POLICY 3/5

Objections

Jonathan Larmour

776/1/DEP02/03_P05

Summary of Objections

- The importance of the location and accessibility of community and leisure should be stressed in clause (b).
- The text suggesting community and leisure facilities should be in proportion to the scale of the development should be retained in paragraph 3.15.

Inspector's Reasoning and Conclusions

3.18.1. In the interests of producing a more concise Plan I am content that the issue of location together with accessibility is adequately addressed elsewhere at Policy 8/1.

3.18.2. With regard to paragraph 3.15, the nature of facilities which are provided will not necessarily be limited by the scale of the new community being developed. There may be circumstances where the needs of a wider catchment area could be met without harm and where the provider of the facility is willing to meet the wider need.

RECOMMENDATION

3.18.3. I recommend no modification to the RDD.

3.19 PARAGRAPH 3.15

Objections

Windsor Road Residents

366/9/DEP02/03_15

Summary of Objections

- Additional reference to the unsatisfied needs of nearby areas is sought.

Inspector's Reasoning and Conclusions

3.19.1. Developers cannot be required to provide for more than the needs generated by their development.

RECOMMENDATION

3.19.2. I recommend no modification to the RDD.

3.20 POLICY 3/7 (FDD)

Objections

Camstead Homes
Land Securities Properties Ltd
James Development Co. Ltd.
Bidwells Property Consultants
Laing Homes Ltd
Wrenbridge Land Ltd
Taylor Woodrow Developments Limited

74/3/DEP01/03_P07
371/3/DEP01/03_P07
378/3/DEP01/03_P07
396/15/DEP01/03_P07
708/11/DEP01/03_P07
709/11/DEP01/03_P07
710/11/DEP01/03_P07

Summary of Objections

- The requirements of the Policy are adequately addressed elsewhere in the Plan.
- Development may be hindered by the requirements of the Policy as factors affecting neighbouring areas are difficult to predict.
- Encouragement is given to neighbouring sites being held to "ransom" by third parties.
- The Policy should be restricted to allocated or UCS sites and partial development accommodated unless harm to wider potential is demonstrated.

Inspector's Reasoning and Conclusions

3.20.1. I consider that there is justification for the Plan seeking to ensure that a development coming forward pays regard to further potential for development on another part of the site or adjoining sites, and does not unreasonably foreclose future development opportunities. The Policy has been changed in the RDD, which makes the Policy more positive, requiring demonstration that due consideration has been given to these issues. I support the Policy in its revised form.

RECOMMENDATION

3.20.2. I recommend no modification of the RDD.

3.21 PARAGRAPH 3.23 (FDD)

Objections

Laing Homes Ltd
Wrenbridge Land Ltd
Taylor Woodrow Developments Limited

708/12/DEP01/03_23
709/12/DEP01/03_23
710/12/DEP01/03_23

Summary of Objections

- Circumstances where development on part of a site is appropriate should also be accommodated.

Inspector's Reasoning and Conclusions

3.21.1. The Policy and its supporting text do not prevent development on part of a site. With the revision to the Policy in the RDD, which I have referred to above, I consider that there is no modification needed in response to these objections.

RECOMMENDATION

3.21.2. I recommend no modification to the RDD.

3.22 PARAGRAPH 3.16

Objections

Windsor Road Residents

366/13/DEP02/03_16

Summary of Objections

- Master Plans and development briefs should be obligatory.

Inspector's Reasoning and Conclusions

3.22.1. I concur with the Council view that the need for Master Plans and design briefs is closely related to the scale and complexity of development proposed. Such exercises may not be appropriate in certain circumstances nor at all sites.

RECOMMENDATION

3.22.2. I recommend no modification to the RDD.

3.23 POLICY 3/8 (FDD)

Objections

The objections to this aspect of the Plan are listed in Annex 3.

Summary of Objections

- Reference to the use of planning obligations is best dealt with in the proposed SPG on that matter, and should be limited to commercial development.
- Public art and public realm improvements should only be sought where they involve areas accessible to the general public, and cannot be mandatory. Development proposals should be required to enhance or maintain the public realm but not both.
- A clause relating to inclusiveness or accessibility should be included.
- The Policy should also be used to initiate improvements within existing areas.
- The location of supported housing should be considered in terms of any likely negative impact on the community.
- The role of Urban Design in creating successful places should be recognised.
- A variety and quality of materials appropriate to the differing localities in Cambridge should be encouraged.
- Only larger developments should generally be required to contribute to wider improvements. Planning conditions, rather than obligations, can secure what is sought. Key considerations are the nature and scale of proposals.
- Without a specific policy requiring public art within new developments, the requirement for development to demonstrate the issue has been considered is inappropriate.

Inspector's Reasoning and Conclusions

3.23.1. The references to planning obligations have been removed from this Policy in the RDD on the basis that there is reference elsewhere. I consider that the relevant objections have been met.

3.23.2. Public art is only public when it is in a place accessible to the public or when it can be seen from a publicly accessible place. It is important that the improvement and enhancement of the public realm should be considered in development of all kinds. The Policy is not inflexibly worded, and there is guidance which the Council has produced in relation to public art and in the Planning Obligations Strategy which deals with contributions towards the public realm and public art I see no reason to amend the Policy in this respect.

3.23.3. Concerns relating to accessibility and inclusiveness have been overcome through the insertion of an additional clause (m). I note the RDD Policy has also been reworded in a more flexible manner.

3.23.4. Improvement within existing areas of development, without new development being available to make such provision, would, it seems to me, necessarily involve expenditure of public money. The development plan is not the place for corporate policies, but rather matters of this sort can be addressed in, for instance, Conservation Area Appraisals.

3.23.5. I agree with the Council that concerns raised by Save Midsummer Common about likely or perceived negative impacts of certain types of housing development are best addressed through application of a number of relevant policies. This approach is preferable to the inclusion of a separate Policy. Therefore, I am satisfied that the Plan goes sufficiently far in this Policy, addressing issues concerning the location of such development through clause (h) which includes appropriate design considerations.

3.23.6. In order for the Plan to be concise in nature it is acceptable for the design of public spaces to be excluded from FDD Policy 3/8 as it is covered in detail

elsewhere, at RDD Policy 3/11.

3.23.7. The Council has in expanding clause (i) in the RDD included additional factors to consider in terms of building materials but does not go so far as to detail the "palette" of materials as requested. However, I agree that this would make the particular consideration too detailed. It would also repeat the provisions contained in paragraph 3.10 which includes full reference to the "palette" of building materials present in the various areas of the City.

3.23.8. With regard to the objections by the House Builders Federation, there is no emphasis on planning obligations. Conditions can also be considered in the context of what is appropriate in any given development proposal, although there clearly will be occasions when obligations will be appropriate, and conditions inappropriate. As for the point about public art, the Council draws attention to the Public Art Strategy, but the requirement for blanket fulfilment of all criteria has been removed, and I consider that this deals satisfactorily with this part of the objections.

3.23.9. I cannot see that there is anything wrong with seeking improvement and enhancement of the public realm, since it would be wrong to maintain unattractive areas. A contribution would not be necessary to "maintain" the public realm in its existing state. Such improvement and enhancement will always be a matter of negotiation. It is also pertinent to note here that the requirement for blanket fulfilment of all criteria has been removed (also see 3.24.3 below).

3.23.10. I see no reason for there to be a specific policy on public art, which I regard as satisfactorily covered in this Policy, bearing in mind the changes made to the Policy in the RDD.

RECOMMENDATION

3.23.11. I recommend no modification to the RDD.

3.24 POLICY 3/7

Objections

Jonathan Larmour
Sohnius And Perry Ltd

776/2/DEP02/03_P07
784/2/DEP02/03_P07

Summary of Objections

- The requirement for public art can be sought through the requirements of clause (c) and the force of part 1 of the Policy is not needed.
- Dictating the orientation of habitable rooms is inappropriate, due to a number of factors relating to the way modern lifestyle influences the way living space is used.

Inspector's Reasoning and Conclusions

3.24.1. I consider that public art should be one of the elements sought by this Policy. There is elaboration in Supplementary Planning Guidance "Provision of Public Art as Part of New Development Schemes" which seeks to ensure that public art is appropriate to and well integrated with its development context.

3.24.2. Greater flexibility and freedom for designers to take account of the many and varied factors influencing design would be achieved by the rewording of the

phrase introducing the criteria of this Policy, and the Council agreed relevant wording at the inquiry. Otherwise, the provision of active edges onto public spaces is very much in line with national guidance, which refers to methods of making such provision whilst maintaining privacy. Sustainable energy, and the role of orientation, are considered in Policy 8/16 and the supporting text. Criterion (e) of Policy 3/7 does not require all entrances and habitable room windows to be located next to the street. I conclude that the criterion is not too prescriptive, with the modification I recommend.

RECOMMENDATIONS

3.24.3. I recommend that the RDD be modified by the deletion from Policy 3/7 of the words "Such developments should demonstrate:" and their replacement by "Factors to be taken into account are:".

3.25 PARAGRAPH 3.24 (FDD)

Objections

Cambridge Preservation Society

26/10/DEP01/03_24

Summary of Objections

- "Where appropriate" should be deleted from the final sentence.

Inspector's Reasoning and Conclusions

3.25.1. The phrase "Where appropriate" has been deleted from renumbered RDD paragraph 3.17, strengthening the expectations for new development to contribute to both the existing public realm and new spaces. The objection is therefore overcome.

RECOMMENDATION

3.25.2. I recommend no modification to the RDD.

3.26 PARAGRAPH 3.27 (FDD)

Objections

Windsor Road Residents

366/8/DEP01/03_27

Summary of Objections

- The requirements are considered unachievable and should be deleted.

Inspector's Reasoning and Conclusions

3.26.1. I see nothing wrong with this paragraph. It follows current guidance and good practice.

RECOMMENDATION

3.26.2. I recommend no modification to the RDD.

3.27 PARAGRAPH 3.28 (FDD)

Objections

Windsor Road Residents

366/9/DEP01/03_28

Summary of Objections

- Advocating design that allows for well connected movement for pedestrians can provide criminals with escape routes.

Inspector's Reasoning and Conclusions

3.27.1. This is dealt with below.

RECOMMENDATION

3.27.2. I recommend no modification to the RDD.

3.28 PARAGRAPH 3.21

Objections

Windsor Road Residents

366/20/DEP02/03_21

Summary of Objections

- Pedestrian networks should be designed so as not to provide criminals with escape routes.

Inspector's Reasoning and Conclusions

3.28.1. Whilst recognising the relationship between accessibility, especially in relation to pedestrian networks, and criminal activity, this supporting text is concerned with giving priority to travel modes other than the private car. I agree with the Council that Policy 3/7 adequately addresses the issue of the threat of criminal activity through the measures contained in clauses (d) and (h). These can be considered in the design and layout of proposals such as through the degree of natural surveillance that may be incorporated.

RECOMMENDATION

3.28.2. I recommend no modification to the RDD.

3.29 PARAGRAPH 3.29 (FDD)

Objections

Windsor Road Residents

366/10/DEP01/03_29

Summary of Objections

- Strengthen and include the need for close consultation with the community.

Inspector's Reasoning and Conclusions

3.29.1. This is dealt with below.

RECOMMENDATION

3.29.2. I recommend no modification to the RDD.

3.30 PARAGRAPH 3.22

Objections

Windsor Road Residents

366/17/DEP02/03_22

Summary of Objections

- Community consultation should take place throughout the process.

Inspector's Reasoning and Conclusions

3.30.1. I note that reference to consultation with the local community is contained elsewhere at RDD paragraph 2.12 and applies to all Plan policies. In the interest of conciseness and to avoid repetition such a reference is not required in relation to individual policies.

RECOMMENDATION

3.30.2. I recommend no modification to the RDD.

3.31 POLICY 3/9 (FDD)

Objections

The objections to this aspect of the Plan are listed in Annex 3.

Summary of Objections

- The Policy should be applied proportionately and the contributions sought should be the subject of individual negotiation.
- All development should be subject to the provisions of the Policy and should consider open space as an integral part of the design.
- College development should be excluded from any requirement for provision of public open space and sports facilities.
- Should all open space required be public?
- Encouragement to improving accessibility to the countryside and use of the public rights of way network should be included here.
- Contributions should only be expected from residential development when it is appropriate to the scale and nature of the proposal.

- Open space should not be encouraged alongside railways and should only be sought where audit suggests existing facilities are not adequate.

Inspector's Reasoning and Conclusions

3.31.1. Between the publication of the FDD and RDD, the Open Space and Recreation Strategy was adopted, and Policy 3/9 has been revised and becomes 3/8. In the Redeposit version, the Open Space and Recreation Standards are set out in Appendix A. This Appendix only sets out standards for residential development. This is because there is no national or regional guidance on the provision of open space through non-residential development, and the Council considers it inappropriate to include a reference to open space provision in non-residential development given the lack of guidance. However, Policy P1/3 of the Cambridgeshire and Peterborough Structure Plan has a requirement for all new development to include attractive green spaces and corridors for recreation and biodiversity. Under the adopted Cambridge Local Plan Policy RL3 requires new housing and other appropriate development, including major centres of employment, to include provision of open space. In relation to Addenbrooke's Hospital, given as an example by the objector, through the masterplanning process, it is intended to create centralised and localised areas of open space well related to their facilities. Whilst I consider, for the reasons indicated by the Council, that the Policy should not require non-residential development to provide open space when there are no standards for such requirements in the Plan, I consider that there should be a reference in the supporting text to the need for such consideration to be given in appropriate other development including major centres of employment.

3.31.2. I see no reason why College development should be excluded from any requirement for provision of public open space and sports facilities. The standards in Appendix A make specific provision for student housing. Other college development does not fall within the standards for residential development.

3.31.3. The County Council's objection is met in paragraph 3.26 through SC3.009.

3.31.4. I note that the issue of space being an integral part of the design of new development is considered elsewhere within Policy 3/7 clause (f). It is clear that this consideration will encompass open space. Combined with revisions to Policy 3/9 this makes it clear that open space should be public.

3.31.5. The detailed point raised by Network Rail about safety fencing requirements is more appropriately dealt with at planning application stage.

3.31.6. Under the Policy, open space is sought to provide for the needs of residents, and subject to my recommendation, should be provided in relation to other development where it is an appropriate requirement in relation to that development. In this latter case it would be pertinent to take account of the adequacy of existing facilities at the location.

3.31.7. To ensure openness, a framework is needed for the provision of or contributions towards facilities required in connection with new developments. Thus it is necessary to have a clear set of standards, as set out in Appendix A. However, other material considerations will also need to be taken into account in determining the contributions for particular sites.

RECOMMENDATION

3.31.8. I recommend that the RDD be modified by adding an extra sentence at the end of paragraph 3.26 as follows: "Where appropriate, other non-residential development, including major centres of

employment, may require the provision of open space. This will be dealt with through masterplanning or design briefs."

3.32 POLICY 3/8

Objections

Countryside Agency	14/1/DEP02/03_P08
Cambridgeshire County Council	55/21/DEP02/03_P08
Countryside Properties	68/1/DEP02/03_P08
The Bell Educational Trust	83/2/DEP02/03_P08
The House Builders Federation	362/2/DEP02/03_P08
Windsor Road Residents	366/18/DEP02/03_P08
GO-East	383/3/DEP02/03_P08
Peter Convey	766/2/DEP02/03_P08
Trumpington Meadows Land Company	798/9/DEP02/03_P08

Summary of Objections

- The wording of the Policy should also emphasise the requirement to include new informal open space provision by reinstating references to common land and country parks.
- Residential development should support the development of accessible countryside areas.
- The variety of potential uses of significant areas of open space should be emphasised, such as use of formal pitches for informal recreation.
- Clarification is sought that the open space standards are fixed for the Plan period and that the Policy will apply only to development that generates demand for additional open space provision. Provision need not always be made on site.
- The Policy should be clear that provision of open space is not a 'blanket' requirement and can only be sought through negotiation when appropriate to the development concerned.
- Safeguards should be included to compensate for any under provision arising from commuted payments.
- Reference should be made to a commitment to protect the River Cam as a threatened recreational asset.

Inspector's Reasoning and Conclusions

3.32.1. I note the inclusion of a suitable cross reference to the Open Space and Recreation Standards. Consequently, I agree that specific reference in Policy 3/8 to informal open space is unnecessary. Changes to the Table 1, Appendix A definitions to refer to natural green spaces as part of the informal provision also help further meet the concerns of the Countryside Agency.

3.32.2. The Council has proposed a pre-inquiry change to paragraph 3.26 (SC3.009) which adds the sentence: "Some of the open space provided will be outside the City boundary, and will include accessible countryside areas." I consider that this meets the objection that residential development should be shown as supporting development of accessible countryside areas.

3.32.3. I consider that, in general, formal and informal open space serve to meet

separate needs, and the same piece of land does not meet the needs of more than one type of use. In individual particular circumstances it may be that an open space can fulfil more than one need, but this does not justify any change to the Policy.

3.32.4. The Plan cannot be altered by SPG (or SPDs under the new system of Local Development Frameworks), which can be used to amplify the Plan's provisions but cannot themselves substitute new policy. The provisions of the Plan, including Appendix A, will therefore remain until such time as the Plan is superseded.

3.32.5. I am told that there is currently no surplus open space, as set out in the Open Space and Recreation Strategy 2004. The standards set out in Appendix A of the Plan are necessary to provide an appropriate level of open space to meet the needs of the development.

3.32.6. Whilst I agree entirely that open space provision associated with new development need not always be met on site, I am satisfied that the Policy is sufficiently clear in suggesting how off site provision will be achieved. Therefore commuted payments may be appropriate in certain circumstances and additional safeguards are unnecessary, given that further guidance in the Open Space and Recreation Strategy supports the prioritising of on site provision. Paragraph 3.25 in the RDD has added text which refers to further guidance for the Areas of Major Change being produced which will, no doubt, address matters in, for instance, the Southern Fringe.

3.32.7. The Policy and the standards in Appendix A are to provide an appropriate level of open space to meet the needs of the development. Since there is at present no surplus of open space, all development will produce a need which should be met since otherwise there would be a shortfall.

3.32.8. The importance of the River Cam in a recreational context is a separate issue to the matters contained in this Policy. When reading the Plan as a whole I agree that the river is dealt with adequately elsewhere at RDD Policy 3/9 and its subsequent supporting paragraphs as well as through reference within Chapter Four, Conserving Cambridge.

RECOMMENDATION

3.32.9. I recommend that the RDD be modified by the incorporation of SC3.009.

3.33 PARAGRAPH 3.33 (FDD)

Objections

Christ's College
Laing Homes Ltd
Wrenbridge Land Ltd
Taylor Woodrow Developments Limited

364/11/DEP01/03_33
708/15/DEP01/03_33
709/15/DEP01/03_33
710/15/DEP01/03_33

Summary of Objections

- College development should be excluded from any requirement for the provision of public open space and sports facilities.

- Contributions should only be expected from development when it is appropriate to the scale and nature of the proposal and should be subject to individual negotiation.

Inspector's Reasoning and Conclusions

3.33.1. I have dealt above with the substance of both of these objections.

RECOMMENDATION

3.33.2. I recommend no modification to the RDD.

3.34 PARAGRAPH 3.26

Objections

Pre-Inquiry Changes: SC3.008 & SC3.009

E P Southern

540/1/DEP04/03_26

Summary of Objections

- The Plan provides a lower standard (1.2ha per 1000 persons) of provision than at FDD stage (1.6ha).
- Query as to whether provision for the ratio of children/teenagers is additional and includes informal open spaces.

Inspector's Reasoning and Conclusions

3.34.1. The proposed changes are to paragraph 3.26, not to the standards.

RECOMMENDATION

3.34.2. I recommend that the RDD be modified by the incorporation of SC3.008 and SC3.009.

3.35 POLICY 5/4 (FDD)

Objections

The Bursars' Committee of The Cambridge Colleges
English Nature

87/15/DEP01/05_P04
368/10/DEP01/05_P04

Summary of Objections

- Development should not necessarily require public access where none currently exists.
- There should be a cross reference to Policy 3/15

Inspector's Reasoning and Conclusions

3.35.1. The Policy clearly states that waterside or water related development "maintain or improve public access". Therefore if improvement is not possible the Policy already implies that where provision of public access is not suitable it is acceptable for this situation to remain. Accordingly no further addition to clause

(b) is required.

3.35.2. The Plan should be read as a whole, and cross-referencing is not necessary.

RECOMMENDATION

3.35.3. I recommend no modification to the RDD.

3.36 POLICY 3/9

Objections

The objections to this aspect of the Plan are listed in Annex 3.

Summary of Objections

- The importance of the River Cam should be appropriately acknowledged and protected here.
- The problems of mooring and congestion should be included here, with proposals to resolve them.

Inspector's Reasoning and Conclusions

3.36.1. I am content that the concerns of those objectors who take issue with the prominence given to the river, or are concerned with the impacts of additional activities, are met with Policy protection appropriate to the nature and scale of the issue. Policy 3/9, the principal river related Policy, is supported with appropriate justification along with a number of other policies contained in the Conserving Cambridge Chapter, and the Plan should be read as a whole. I also agree with the Council view that these parts of the Plan go sufficiently far in promoting leisure and recreation activities on the River as long as it is not at the expense of the environment. In addition the Plan is not concerned with managing the existing problems identified which are not land use matters.

3.36.2. There is added emphasis in recent government guidance on the need for Plans to be succinct. Clause (d) is clear that new recreational development affecting the River Cam must prove additional capacity is available to absorb the resulting impact. Therefore it is unnecessary to increase the restrictions of the Policy by specific reference to controls for additional hire stations. I deal with specific concerns relating to the need for off river mooring below.

RECOMMENDATION

3.36.3. I recommend no modification to the RDD.

3.37 PARAGRAPH 3.27

Objections

Conservators of the River Cam

755/7/DEP02/03_27

Summary of Objections

- Off river mooring facilities should be introduced to alleviate the pressure caused by increased mooring of houseboats.

Inspector's Reasoning and Conclusions

3.37.1. This is dealt with below.

RECOMMENDATION

3.37.2. I recommend no modification to the RDD.

3.38 PARAGRAPH 3.28

Objections

Conservators of The River Cam

755/8/DEP02/03_28

Summary of Objections

- Off river mooring facilities should be introduced to alleviate the pressure caused by the increased mooring of houseboats.

Inspector's Reasoning and Conclusions

3.38.1. I deal with the matter of additional moorings at the end of this Chapter.

RECOMMENDATION

3.38.2. See my recommendation at the end of this Chapter.

3.39 POLICY 3/18 (FDD)

Objections

Camstead Homes
James Development Co. Ltd.
Keymer Cavendish

74/5/DEP01/03_P18
378/5/DEP01/03_P18
431/1/DEP01/03_P18

Summary of Objections

- The requirements of this Policy are met elsewhere in the Plan and clause (f) could potentially delay development where there is potential to develop adjoining land.
- The Policy discourages increasing the density of existing residential areas.

Inspector's Reasoning and Conclusions

3.39.1. I consider that there is justification for having a Policy which explicitly deals with the sub-division of existing plots, since this is a common form of development. Even if there are some aspects of the Policy which can be divined from elsewhere in the Plan, and it is generally desirable to avoid repetition, there is sufficient utility and clarity in having this specific Policy. Nor do I find that clause (f) should be deleted since it is important that consideration be given to wider, comprehensive, development opportunities when considering this form of

development.

3.39.2. Although not specifically encouraging greater densities the Policy does not prevent them either. Furthermore the justification to the Policy is clear in welcoming new accommodation whilst wisely expressing caution as to how this is achieved within existing curtilages.

RECOMMENDATION

3.39.3. I recommend no modification to the RDD.

3.40 POLICY 3/10 (FDD)

Objections

English Heritage

338/7/DEP01/03_P10

Summary of Objections

- A variety and quality of materials appropriate to the differing localities in Cambridge should be encouraged.

Inspector's Reasoning and Conclusions

3.40.1. Reference to the Cambridge palette of construction materials has already been incorporated at paragraph 3.10 in relation to responding to context.

RECOMMENDATION

3.40.2. I recommend no modification to the RDD.

3.41 POLICY 3/11

Objections

English Heritage
Mrs Penny Heath

338/11/DEP02/03_P11
832/6/DEP02/03_P11

Summary of Objections

- "Historic interest" should be added to the criteria to be taken account of at clause (b).
- Stricter criteria for street furniture should be incorporated into the Policy and wider consultation undertaken.

Inspector's Reasoning and Conclusions

3.41.1. In order to maintain the conciseness of the Policy, it is reasonable to accept that "historic interest" is one of a number of factors that are considered in assessing which existing features positively contribute to the "character" and "amenity" of a site.

3.41.2. Many traffic signs are not subject to City Council approval. I am told that consultation takes place in respect of signage and furniture where appropriate and beneficial. Nevertheless some street furniture is under the direct control of the

Council in considering development proposals. Part (c) of the Policy deals with this, bringing into play, among other matters, an uncluttered appearance and appropriateness to the context. I consider that this is adequate to enable the Council to control matters which are within the purview of planning control and to engage in consultation where relevant.

RECOMMENDATION

3.41.3. I recommend no modification to the RDD.

3.42 POLICY 3/11 (FDD)

Objections

Cambridge Preservation Society	26/13/DEP01/03_P11
Cambridge Urban Forum	322/8/DEP01/03_P11
English Heritage	338/8/DEP01/03_P11
The House Builders Federation	362/6/DEP01/03_P11
GO-East	383/12/DEP01/03_P11
Bidwells Property Consultants	396/17/DEP01/03_P11

Summary of Objections

- "Sustainably constructed" requires further explanation.
- The requirement for a building to be adaptable may be inappropriate in some circumstances.
- Accessibility is adequately dealt with in legislation elsewhere.
- A variety and quality of materials appropriate to the differing localities in Cambridge should be encouraged.
- The Policy deserves a more prominent location.
- It is not possible to apply the positively worded Policy to development control.

Inspector's Reasoning and Conclusions

3.42.1. Policy 3/11, which becomes Policy 3/12 in the RDD, is reworded so as to refer to buildings being constructed in a sustainable manner. This change, and the Policy's supporting paragraphs, now explain the Policy's intentions more clearly. Additional reference to energy efficiency contained in the final sentence of paragraph 3.33 further clarifies the requirements to be incorporated in new build construction.

3.42.2. It is now well established government Policy that new development should be well designed. Therefore I support the intentions behind this Policy. Whilst some of the specific matters dealt with are also covered by other legislation, such as the Building Regulations, this Policy is concerned with principle which is legitimate in a development plan. As to the question of design methodologies and their role in arriving at the final design, this is of legitimate interest in determining whether a design is of sufficiently high quality to be granted planning permission.

3.42.3. Given the previously mentioned reference to the Cambridge palette of construction materials at paragraph 3.10, and in the interests of maintaining the conciseness of the Policy, the Council view of the dangers of including this additional information is reasonable. I agree that the information is also more appropriately detailed elsewhere in Conservation Area Appraisals and to an extent

in the Cambridge Landscape Assessment.

3.42.4. I am satisfied that the Policy is located appropriately within the Plan and is consistent with ordering elsewhere. Each chapter starts with those policies concerned with wider issues. Chapter Three starts with policies that relate to sustainability and the City as a whole. It then moves on to add more detailed policies, and this particular Policy is concerned with individual buildings.

3.42.5. I do not agree that this Policy should be deleted on the basis that it is expressed in positive terms. It should be possible for a developer and designer to demonstrate the quality of the proposal in its context. This is desirable in view of the government's wish to raise the quality of design so that only good design is permitted.

RECOMMENDATION

3.42.6. I recommend no modification to the RDD.

3.43 PARAGRAPH 3.36 (FDD)

Objections

The House Builders Federation

362/29/DEP01/03_36

Summary of Objections

- The internal layout of buildings should not be included here as it is not material to the consideration of a planning application.

Inspector's Reasoning and Conclusions

3.43.1. I cannot see that the reasoned justification to Policy 3/12 seeks to control the internal layout of buildings.

RECOMMENDATION

3.43.2. I recommend no modification to the RDD.

3.44 PARAGRAPH 3.33

Objections

The House Builders Federation
The Wildlife Trust

362/3/DEP02/03_33
382/3/DEP02/03_33

Summary of Objections

- Energy conservation is adequately dealt with in other legislation.
- Specific reference should be made to water conservation.

Inspector's Reasoning and Conclusions

3.44.1. I agree that national policy contained in PPS1 is clear in that development plans should reflect the need to be prudent in the use of natural resources by promoting resources or activities which meet this requirement. This is justifiably

reflected in the additional sentence added to the RDD, requiring buildings to be energy efficient in their construction and running costs.

3.44.2. There are only limited ways in which planning control can influence the efficient use of water resources in development. I do not consider that this is a topic that should be covered in the Policy and its reasoned justification, but rather it should be left to be dealt with in the Supplementary Planning Guidance which has been produced entitled 'Cambridge Sustainable Development Guidelines'.

RECOMMENDATION

3.44.3. I recommend no modification to the RDD.

3.45 PARAGRAPH 3.37 (FDD)

Objections

English Heritage
The House Builders Federation

338/9/DEP01/03_37
362/30/DEP01/03_37

Summary of Objections

- A variety and quality of materials appropriate to the differing localities in Cambridge should be encouraged.
- Construction methods are adequately dealt with in other legislation.

Inspector's Reasoning and Conclusions

3.45.1. The first objection is dealt with above.

3.45.2. In my understanding, this paragraph is not duplicating other legislation, but is setting out material considerations relating to an appraisal of a development proposal for planning permission.

RECOMMENDATION

3.45.3. I recommend no modification to the RDD.

3.46 PARAGRAPH 3.38 (FDD)

Objections

The House Builders Federation

362/31/DEP01/03_38

Summary of Objections

- The deletion of all matters that go beyond planning control is requested.

Inspector's Reasoning and Conclusions

3.46.1. In my understanding, this paragraph is not duplicating other legislation, but is setting out material considerations relating to an appraisal of a development proposal for Planning permission.

RECOMMENDATION

3.46.2. I recommend no modification to the RDD.

3.47 PARAGRAPH 3.39 (FDD)

Objections

The House Builders Federation

362/32/DEP01/03_39

Summary of Objections

- Removal of references to matters that are beyond the scope of planning control, particularly Design Quality Indicators, is sought.

Inspector's Reasoning and Conclusions

3.47.1. The omission of reference to Design Quality Indicators in paragraph 3.36 overcomes the concern of the HBF on this issue.

RECOMMENDATION

3.47.2. I recommend no modification to the RDD.

3.48 POLICY 3/12 (FDD)

Objections

Cambridge Preservation Society

26/14/DEP01/03_P12

Camstead Homes

74/4/DEP01/03_P12

C. Nicholson

318/2/DEP01/03_P12

English Heritage

338/10/DEP01/03_P12

James Development Co Ltd.

378/4/DEP01/03_P12

Bidwells Property Consultants

396/18/DEP01/03_P12

South Cambridgeshire District Council

461/13/DEP01/03_P12

Summary of Objections

- Propose the insertion of "only" before "be permitted".
- Suitable locations for tall buildings should be identified on the Proposals Map.
- Criteria for tall buildings should be less rigidly defined, due to pressure to develop more densely.
- Criteria for tall buildings should be more strictly defined to preserve the character of Cambridge and prevent major high rise development.
- Clause (f) relating to positive townscapes is reliant on subjective judgement and should be removed.
- The Policy should give details of the circumstances when tall buildings may be permitted, including their locations and heights. It should either be refocused as a City Skyline Policy or amalgamated with Policy 3/2.

Inspector's Reasoning and Conclusions

3.48.1. The addition of "only" between "will" and "be permitted" within RDD Policy 3/13 fully overcomes the objection of the Preservation Society.

3.48.2. Whilst CABE emphasises the need for cities to recognise that tall buildings provide a way of providing sustainable communities on brownfield sites, this is general guidance. Cambridge is a particular place requiring policies which reflect its nature, character and history. I do not consider that it would be right to take a "positive" approach to tall buildings. Rather the Policy allows for tall buildings in the right circumstances. Nor do I consider that it would be a practical possibility, certainly at this stage in the Plan's preparation, to identify suitable locations for tall buildings on the Proposals Map. Whilst over time visual perceptions may change, the Plan should certainly not embrace tall buildings as a frequent means of achieving development aims.

3.48.3. As for the counter view that the Policy should be explicitly against tall buildings, I reject this as being too restrictive. The Policy is about protecting the City's character and is clear that tall buildings will only be acceptable if they do not harm the issues listed; and the word "only" has been introduced into the policy in the RDD. I consider that this is the right approach.

3.48.4. The original clause (f) has been deleted.

3.48.5. I agree it is impractical to contain details relating to the heights and locations of potential new tall buildings within Policy 3/13. However, I am satisfied that, in adding the consideration of views from outside the City to RDD clause (f), the objection by South Cambridgeshire District Council is met in part. Harm to views to and over the City is prevented. Policy 3/2 is concerned with other matters.

RECOMMENDATION

3.48.6. I recommend no modification to the RDD.

3.49 POLICY 3/13

Objections

English Heritage
Windsor Road Residents
South Cambridgeshire District Council

338/12/DEP02/03_P13
366/21/DEP02/03_P13
461/4/DEP02/03_P13

Summary of Objections

- Criteria for tall buildings should be more strictly defined to preserve the character of Cambridge and prevent major high rise development.
- High rise development should be prevented from becoming the focus for new residential development.
- The replacement of criterion (g) is requested along with recognition of the need for detailed consideration of the cumulative impact of tall buildings.

Inspector's Reasoning and Conclusions

3.49.1. I reject the view that the Policy should be explicitly against tall buildings as being too restrictive. The Policy is about protecting the City's character and is clear that tall buildings will only be acceptable if they do not harm the issues listed. I consider that this is the right approach.

3.49.2. I do not consider that there is a need for the Policy to explicitly guard against high rise residential buildings on new residential sites. The Policy is clear that the criteria listed in items (a)-(f) refer to all buildings, residential or

otherwise.

3.49.3. In relation to the third point of objection, the reference to item (g) appears to be misplaced, since there is no item (g) in the RDD. However, taking the point about cumulative impact, I consider that the Policy must inevitably be operated to include such considerations. The assessment of whether a new tall building is acceptable will inherently require the consideration of the cumulative impact of other tall buildings. Part (f) includes the word "skyline" which requires the new building to be considered in its context which will embrace the cumulative effect.

RECOMMENDATION

3.49.4. I recommend no modification to the RDD.

3.50 PARAGRAPH 3.41 (FDD)

Objections

Windsor Road Residents

366/16/DEP01/03_41

Summary of Objections

- High rise development should be prevented from becoming the focus for new residential development.

Inspector's Reasoning and Conclusions

3.50.1. See my conclusions set out above.

RECOMMENDATION

3.50.2. I recommend no modification to the RDD.

3.51 PARAGRAPH 3.38

Objections

Windsor Road Residents

366/70/DEP02/03_38

Summary of Objections

- High rise development should be prevented from becoming the focus for new residential development.

Inspector's Reasoning and Conclusions

3.51.1. See my conclusions set out above.

RECOMMENDATION

3.51.2. I recommend no modification to the RDD.

3.52 PARAGRAPH 3.43 (FDD)

Objections

North Newnham Residents Association

678/9/DEP01/03_43

Summary of Objections

- The views referred to should be appropriately cross referenced on the Proposals Map rather than to the unpublished Cambridge Landscape Character Assessment.

Inspector's Reasoning and Conclusions

3.52.1. I note that the Council says that cones of view have been deliberately dropped in view of their consistent failure when cited in planning appeals. In the light of this, I cannot reasonably recommend that they be reinstated. Important vistas and views are, however, identified in Cambridge Character Assessment and Conservation Area Appraisals.

RECOMMENDATION

3.52.2. I recommend no modification to the RDD.

3.53 POLICY 3/13 (FDD)

Objections

Cambridge Preservation Society

26/15/DEP01/03_P13

Summary of Objections

- The Policy is unclear and should be expressed more strongly.

Inspector's Reasoning and Conclusions

3.53.1. The strengthening of the wording of the Policy through the addition of "only" between "will" and "be permitted", together with revisions to clause (f) to incorporate views from outside the City as a consideration, goes sufficiently far in strengthening the Policy.

RECOMMENDATION

3.53.2. I recommend no modification to the RDD.

3.54 POLICY 3/14

Objections

Jonathan Larmour

776/3/DEP02/03_P14

Pre-Inquiry Changes: SC3.006 & SC3.007

Summary of Objections

- The Policy should be expanded.

Inspector's Reasoning and Conclusions

3.54.1. Suggested changes are put forward to overcome this concern by the inclusion of reference to bin storage and cycle parking at clause (c).

RECOMMENDATION

3.54.2. I recommend that the RDD be modified by the incorporation of SC3.006 and SC3.007.

3.55 OMISSION SITE 17 – FIELD AT FEN END**Objections**

Conservators of the River Cam	755/6/DEP02/O17
Shirley Fieldhouse	278/6/DEP03/O17
Transport 2000 Cambridgeshire & West Suffolk	374/6/DEP03/O17
Residents Against Village Extinction (RAVE)	561/8/DEP03/O17
Dr. N. S. Galbraith	1127/1/DEP03/O17
Dr. Irene Gomez	1209/1/DEP03/O17
Richard Moseley	1241/1/DEP03/O17
John Kerry	1304/1/DEP03/O17
Andrew Brown	1369/1/DEP03/O17
James Matthews	1370/1/DEP03/O17

Further Proposed Changes: FPC10 and FPC11**Summary of Objections**

- This site should be identified for off-river moorings.
- Moorings would not be consistent with the Green Belt designation of the land.
- There would be obstruction of the towpath and river. Road access is inadequate. Noise and ugly development are possibilities. There are few facilities in the area.

Inspector's Reasoning and Conclusions

3.55.1. The proposed allocation is not necessarily incompatible with the land's Green Belt designation: as the Council intimates, the use could be of a scale and intensity which would maintain the openness of the Green Belt and not conflict with the purposes of including land in the Green Belt. There would be recreational and other benefits. There is evidence of need, but no technical evidence that the road access would be inadequate for the traffic which would result. The towpath could be rebuilt to accommodate all users. Although some distance away, there are facilities and services in Chesterton. The site itself could provide low-key facilities like water points and rubbish collection. It does not seem to me that boat moorings as a matter of principle would be a noisy and disturbing use, but there are possibilities in the layout and design of the scheme for minimising potential disturbance. The evidence of objectors and supporters regarding obstruction to other river users is conflicting.

3.55.2. The Council suggests in its evidence that the Plan should be changed to accommodate the objection by the Conservators of the River Cam and their supporters and puts forward 2 changes to accomplish this.

RECOMMENDATION

3.55.3. I recommend that the RDD be modified by the incorporation of FPCs 10 and 11.

4. CONSERVING CAMBRIDGE

4.1 WHOLE CHAPTER

Objections

Taylor Woodrow Developments Limited
Cambridgeshire County Council
English Heritage
South Cambridgeshire District Council

2/7/DEP02/04
55/22/DEP02/04
338/14/DEP02/04
461/5/DEP02/04

Summary of Objections

- There is no policy reference to safeguarded land or Green Belt review.
- Objectives should refer to nature conservation areas, the historic fabric of the City, and the appearance and setting of the City.

Inspector's Reasoning and Conclusions

4.1.1. The Cambridge Green Belt has been subject to review, and the Structure Plan indicates at the strategic level that specific areas are to be released from the Green Belt. The detailed boundaries of the Green Belt in some areas need to be determined through further work on urban extensions. The Council identifies that some land in these areas will not be available for development until after 2016 and will therefore be safeguarded for the period after 2016. This information is contained in the RDD, in footnote 3 to Table 5.1. As further work is necessary on the urban extensions, the boundaries and capacities of safeguarded land areas cannot be given yet. However the size of the East Cambridge Area of Major Change suggests there will be a large amount of safeguarded land. I conclude elsewhere (Chapter 9) that Airport relocation should be possible: the Council will be in a position to monitor this. In all the circumstances I consider there should not be any policy reference to Green Belt review or safeguarding.

4.1.2. As for the objectives of Chapter 4 of the Plan, I accept the Council's argument that the various matters mentioned in the objections are covered adequately already. Objective 1 refers to green spaces rich in biodiversity. Objectives 1 and 3 make mention of unique qualities, character of urban areas, and built facilities. The last phrase is opaque jargon, and would be better replaced by something more direct and readily understandable, such as 'buildings'. In case the Council has in mind more than just buildings, other features could be added. Finally, in my opinion 'character' encompasses 'appearance', and the third objective includes the setting of the City. Enhancement is a matter sought in the Chapter 3 objectives.

RECOMMENDATION

4.1.3 I recommend that the RDD be modified by the deletion of objective 3 and its replacement by "To protect open spaces, buildings and other features which contribute to the setting, character and enjoyment of the City".

4.2 PARAGRAPH 4.1

Objections

Cambridgeshire County Council

55/23/DEP02/04_01

Summary of Objections

- The paragraph should refer to nature conservation areas, and to policies for enhancement.

Inspector's Reasoning and Conclusions

4.2.1. There are several policies in this Chapter of the Plan which address nature conservation, and objective 1 mentions biodiversity. The topic should feature in the introductory paragraph but in my view the reference should be to biodiversity rather than to areas, in order to avoid the impression that only specific sites matter. I refer above to enhancement: this is a feature of Chapter 3 of the Plan.

RECOMMENDATION

4.2.2. I recommend that the RDD be modified by the replacement of "and open spaces" at the end of paragraph 4.1 by " open spaces and biodiversity".

4.3 PARAGRAPH 4.4

Objections

Cambridgeshire County Council

55/24/DEP02/04_04

Summary of Objections

- The paragraph should refer to design in relation to SUDS and flooding.

Inspector's Reasoning and Conclusions

4.3.1. The matter is adequately dealt with under Policy 4/15.

RECOMMENDATION

4.3.2. I recommend no modification to the RDD.

4.4 POLICY 5/2 (FDD) AND POLICY 4/1 (RDD)

Objections to Policy 5/2

The objections to this aspect of the plan are listed in Annex 3.

Objections to Policy 4/1

Taylor Woodrow Developments Limited
English Heritage
GO-East
Ashwell (Barton Road) Limited

2/3/DEP02/04_P01
338/15/DEP02/04_P01
383/11/DEP02/TWP
659/3/DEP02/04_P01

Summary of Objections

- Several specific sites are put forward for omission from, or retention in, the Green Belt.
- The Green Belt as defined by the Proposals Map is objected to as it has not yet been properly tested. The inclusion of urban green corridors is queried.
- The policy only repeats national planning guidance.
- The Policy should be strengthened. An Area Action Plan (AAP) for the entire Green Belt would be helpful.
- The word "inappropriate" should be deleted from the policy.
- The role of the Cambridge Green Belt should be made clear in the policy, because the Structure Plan will eventually be replaced by the RSS. The policy might be better as a stand-alone policy.
- The amenity value of land identified as Green Belt should be emphasised.
- Rail corridors should be removed from the Green Belt designation.

Inspector's Reasoning and Conclusions

4.4.1. I deal below (Chapters 5, 9, and 11) with those sites (Netherhall Farm, Huntingdon Road/Histon Road, land west of the Technology Park, land at the rear of Queen Edith's Way et al.) which are omission sites or development proposals of the Plan.

4.4.2. The appropriate place to test the proposed boundaries of the Green Belt is through the Local Plan process. The approach of including within the Cambridge Green Belt a number of green corridors extending into the urban area is a long-standing one. Given the special character of these corridors and the contribution they make to the unique character and setting of the City, and bearing in mind the purposes of the Green Belt as set out in the Structure Plan, I see no justification for excluding them from the Green Belt now.

4.4.3. The Council has chosen not to expand on the guidance in PPG 2 "Green Belts", and there is no evidence that the strict controls in that document are inadequate to protect the Cambridge Green Belt. The supporting text places the burden on developers to demonstrate why development should be permitted. No further explanation of the Policy is needed. It is up to the Council to decide, when it prepares its LDS, whether an AAP should be prepared in respect of the Green Belt.

4.4.4. The phrase "inappropriate development" is widely understood and no elaboration is necessary to make the Policy effective. Deletion of "inappropriate" from the policy would, however, lead to conflict with PPG2 advice.

4.4.5. Structure Plan Policy P9/2a sets out the purposes of the Cambridge Green Belt. Although Appendix E of the draft RSS proposes that guidance in Policy P9/2a on uses within the Green Belt should be saved, it is not clear that the purposes of the Green Belt as set out in that Policy are to be saved. For completeness, and to ensure that the special purposes of the Cambridge Green Belt are clearly understood, it would be appropriate to include in explanatory paragraph 4.5 the purposes set out in Policy P9/2a.

Paragraph 4.5 of the RDD now refers to the amenity and wildlife value of parts of the Green Belt.

4.4.6. There is no justification for the exclusion of rail corridors from the Green Belt, and any proposals for development within those areas would be considered in the light of the advice in PPG 2.

4.4.7. Reference to land west of Trumpington Road is not necessary as the investigation undertaken in response to the Structure Plan concern about this land has indicated that it is not suitable for development.

RECOMMENDATION

4.4.8. I recommend that the RDD be modified by the insertion of the following material at the beginning of paragraph 4.5:

The purposes of the Green Belt are to:

- **preserve the unique character of Cambridge as a compact, dynamic City with a thriving historic centre;**
- **maintain and enhance the quality of its setting;**
- **prevent communities in the environs of Cambridge from merging into one another and with the City.**

4.5 PARAGRAPH 5.4 (FDD)

Objections

Addenbrooke's NHS Trust

399/14/DEP01/05_04

Summary of Objections

- The boundary of the Green Belt in southern Cambridge is wrongly drawn on the Proposals Map, and the supporting text to policy 5/2 should indicate that the boundary has been revised to provide a new and appropriate long-term boundary to allow for urban expansion and to include safeguarded land.

Inspector's Reasoning and Conclusions

4.5.1. The boundary of the Green Belt has been amended in the RDD to provide a long-term defensible boundary along a physical feature on the ground, and also to include the Forvie site to allow for the long-term expansion of Addenbrooke's. The proposals schedule in the RDD makes it clear that Site 9.10 is safeguarded land for post 2016. It is unnecessary, and would only add to the length of the plan, to record in the explanatory paragraphs the fact that the Green Belt boundary has been revised.

RECOMMENDATION

4.5.2. I recommend no modification to the RDD.

4.6 PARAGRAPH 4.5

Objections

South Cambridgeshire District Council

461/6/DEP02/04_05

Pre-Inquiry Changes: SC4.001

Summary of Objections

- The final sentence of paragraph 4.5 should make it clear that regard will be had to national planning policy guidance when considering *any* applications in the Green Belt.

Inspector's Reasoning and Conclusions

4.6.1. The Council has proposed a change to paragraph 4.5 that would meet this objection in full.

RECOMMENDATION

4.6.2. I recommend that the RDD be modified by the incorporation of SC4.001.

4.7 POLICY 5/3 (FDD) AND POLICY 4/2 (RDD)

Objections

The objections to this aspect of the plan are listed in Annex 3.

Summary of Objections

- Several specific sites should be omitted from or added to the Proposals Map as Protected Open Space.
- The Policy is negative and too restrictive. It should allow for more flexibility, the provision of replacement land, and exceptions.
- The Policy should not apply to private land, or to every piece of open land.
- The wording of the Policy or supporting text is unclear, or should be expanded to cover green corridors, trees, allotments, the River Cam, public access to open space, and the setting of pedestrian and cycle routes.
- The proposed change is too restrictive or too lax.

Pre-Inquiry Changes: SC4.002, SC PM.003 and CCC313

Inspector's Reasoning and Conclusions

Various Site Specific Objections

4.7.1. Some objections have been met by the inclusion of sites on the RDD Proposals Map as Protected Open Space. This applies to land south-east of Cam Causeway and to Donkeys Common. Cannons Green and land at Shelly Row are small and would be protected by paragraph 4/7(c). The Council gives little information concerning land at George Nuttall Close. From my site visit it appears that the site is committed for development and I do not conclude that it should be designated Protected Open Space.

4.7.2. Some sites suggested for deletion are omission sites in the Plan and are dealt with elsewhere in this report. Those parts of the Land Securities objection which are in reality objections to paragraph 4.7(b) and to Appendix B are considered in the relevant parts of this report.

4.7.3. Pending further work on Areas of Major Change, allotments in such areas should be protected against development because of their value as open space. The same argument applies to the playing fields on the Fawcett School site.

The Former Blue Circle Lakes Site and Adjoining Peterhouse Land

4.7.4. I deal elsewhere with the Phase II and Western Blue Circle sites (see Omission Site 6 in Chapter 5, and Chapter 14). I conclude against the protected open space allocation for the latter site, and change CCC313 should not be made. Protection open space designation should remain for the Phase II site in view of its designation as a City Wildlife Site.

4.7.5. The Lakes Site is a large area of former quarries, much of which is now water-filled. Although the lakes are not accessible to the public, there are pedestrian and cycle routes alongside the land. The site, including the water bodies, is visible from these routes. The exposed chalk cliffs above the water are a striking and unusual sight in an urban context. The combination of land, trees, and water, and the scale of the undeveloped land with this combination of features, give the site substantial importance as an attractive major break in the built-up area.

4.7.6. The site is part of a larger open area. To the south, south-east and north-west is more open land and a further water body. There are interruptions in what the Council sees as a linear open space from the Green Belt south-east of the City to Coldhams Common and beyond. Nevertheless even the Lakes Site and its more immediate surroundings as described above constitutes a linear open space of importance to this quarter of the City.

4.7.7. I conclude that designation as protected open space reflects the value of this site.

4.7.8. The Peterhouse site partly overlaps with and partly adjoins the Lakes site. I deal with it as a housing omission site in Chapter 5, and conclude that it should not be allocated in part for housing. There would be advantages in using the proceeds of housing development to make the area safe and to improve recreational resources. However the Lakes element of the Peterhouse site is of value as open space for reasons given above, and much of the rest of the land is of value as allotments. Again, I conclude that designation as protected open space reflects the value of this site.

The Bell School Site

4.7.9. That part of the school grounds designated as protected open space has public value on a number of counts.

4.7.10. There are public views from the eastern part of Red Cross Lane at points where access to the school site is gained. Otherwise public views from close to are limited to views of the boundary hedge and the upper parts of trees forming the screen alongside Babraham Road. However these views are of significance in providing variety in the urban scene, and a change from the built up parts of the urban area.

4.7.11. The grounds of the school are visually attractive and the sight of them is enjoyed by the staff, students and visitors. Apart from the fact that the grounds are visible from the buildings, they are well seen from the terrace outside the canteen. The grounds contain extensive lawns and areas bearing trees and shrubs. There are items of garden furniture and a summer house with barbecuing equipment. The evidence suggests to me that the grounds are likely to be used, as

well as seen, by those on the site. There are also views over the site from houses in Stansgate Avenue and Greenlands.

4.7.12. Part of the protected land contains tennis and basketball facilities. In conjunction with the contribution which the site makes to the appearance and character of the area, the objection land fulfils several of the functions of open space listed in the Annex to PPG17. I do not see that this national guidance is limited to public land; it refers to domestic gardens, for example. In my opinion also the positive contribution of the land as private land used and/or seen by many people on and near the site amounts to public value.

4.7.13. Some of the tree-covered areas are subject to a Tree Preservation Order, but this applies only to part of the land and I consider that the worth of the land derives from more than just its trees. The protection of the open space by means of Policy 4/2 does not represent unnecessary duplication of protection.

4.7.14. The fact that there are other open spaces in Cambridge which have perhaps greater public value than the objection land but are not designated under Policy 4/2 does not diminish the contribution the site makes. The Council will be able to extend designation to such sites as necessary when the development plan is reviewed. In the meantime land of value is protected by the Policy by virtue of paragraph 4.7 (c) of the Plan.

4.7.15. The protected open space designation should remain. The question of future development on the land is one to be decided on the merits of any proposal which comes forward.

St Matthew's Piece

4.7.16. This land is a grassed open area which contains fine trees. It is small, narrow, and located to the rear of the Dawe Media building. These characteristics do not prevent it, in conjunction with the larger open area to the south, from providing a 'breathing space' in a densely built-up area. This function, and the attractive appearance of the land, are positive aspects of the Mill Road and St Matthew's Conservation Area. These attributes of the land are worthy of protection.

4.7.17. The prospect of a development to enable young people to set up new businesses, and to provide community and educational facilities, important as these objectives are, does not outweigh the need to protect the functions of the land. The redevelopment of the existing building complex can be considered, with the necessary consultations, in the context of these functions.

4.7.18. The protected open space designation was introduced by a Pre-Inquiry Change in response to an objection, and the change should be incorporated in the Plan.

The Nature of the Policy

4.7.19. Proposed change SC4.002 includes in the Policy a major exception to the main policy thrust preventing the harmful development of important open space. For this reason, and because other Plan policies and material considerations would be taken into account in the assessment of individual proposals, this Policy does not introduce a blanket ban on development of open land. The change meets the objections of several parties but has given rise to counter-objections.

4.7.20. The Policy is appropriately expressed in negative fashion because it aims to protect open spaces of public value. That value can be for either recreational or

environmental reasons, or both. Such value can be found in active or passive recreational use, and through contributions to the character, appearance and biodiversity of an area. Private land as well as public land can have such value. It is only land of importance which is to be protected according to the Policy wording, not all undeveloped land.

4.7.21. The proposed change properly reflects national policy in PPG17. It promotes from the supporting text to the Policy the exception for those instances where open space can be satisfactorily replaced elsewhere. This is where the exception should be located, as it would be used in the control of development and is the principal likely exception. Long lists of possible exceptions, or mitigating or balancing factors which might lead to exceptions being made, should not encumber the Policy or be allowed to weaken it.

4.7.22. The Policy does not have to repeat all of the exceptions in the Council's Recreation and Open Space Strategy. The Council will need to judge how the Strategy reflects the Plan when the latter document has been adopted. The Policy and supporting text have been subject to public participation as part of the Plan.

4.7.23. It is not necessary to repeat the lengthy national policy material regarding playing fields. The proposed change and the national guidance itself will be able to form the basis for consideration of proposals affecting playing fields, including school fields. Development affecting educational playing fields should be assessed for its planning as well as its educational merits.

4.7.24. The application of the Policy to individual development proposals will be a matter for the decision maker, who will be able to decide whether any replacement open space is located near enough to the population to be served and whether the existing open space is of environmental value. It is right that the possibility of uses sharing a site is not ruled out, because investment in such a site could enable improved open space provision to be made.

4.7.25. As the Policy is concerned to protect 2 kinds of public value the exception should both require satisfactory replacement, for example where recreational use needs to be provided on replacement open space near a particular housing area, and an environmental test to ensure that areas of environmental significance are not lost through the replacement process.

4.7.26. Both the Green Belt and urban open spaces are valuable. The Cambridge Green Belt has been reviewed and strategic decisions have been taken regarding release where necessary of some Green Belt land. The contribution of open spaces within the urban area is emphasised, not decreased, by the densely built nature of the City.

Suggested Expansions of the Policy to Cover Other Features

4.7.27. Work on the detailed identification of green corridors has not progressed sufficiently to enable all of them to be delineated in the Plan. The Southern Fringe corridor is specifically protected by its designation as Green Belt, which offers a high degree of protection. Undefined corridors are protected by Policy 4/2, as explained by paragraph 4.7 (c) of the Plan. Whether individual proposals in the Green Belt are approved or not is a matter for decision by the Council in considering planning applications and Master Plans for particular areas. My overall conclusion is that there is no need to add further to these references and protective elements of the Plan.

4.7.28. Allotments are protected under the terms of Policy 4/2, and are generally shown as Protected Open Space on the Proposals Map. I do not have evidence that resources are available for the Council to provide new allotments. Open space provision will be required of new developments where a need for it arises because of that development. Whether such space is used for allotments will depend on the merits of the case. Accordingly I do not conclude that a policy requiring new allotment provision should be included in the Plan. The provision of new open space will improve access to open space for the City's population, especially where links to the countryside are set up, as referred to in Chapter 3 of the RDD, and where new development allows improved access. It is not appropriate to require access to private land.

4.7.29. Trees are protected by other elements of the RDD. Areas of trees which have environmental or recreational value would be protected by Policy 4/2. Where open spaces provide the setting for pedestrian or cycle routes they are likely to have environmental importance and therefore to be protected under the Policy.

4.7.30. One objector argues that the threshold for protecting sites under the Policy is too low, and that the Policy should be re-worded to protect sites of major importance, rather than just sites of importance. However the inclusion of the word "importance" itself should be a safeguard to ensure that unimportant sites, and every piece of waste land, are not protected. The change is unnecessary. The designation of sites is a detailed matter. I discuss below under Appendix B in Chapter 11 the criteria used by the Council in deciding on the sites to be protected.

4.7.31. I consider the River Cam in Chapter 3 of this report.

RECOMMENDATION

4.7.32. I recommend that the RDD be modified by the incorporation of SC4.002 and SC PM.003.

4.8 PARAGRAPH 5.5 (FDD)

Objections

Bidwells Property Consultants

396/38/DEP01/05_05

Summary of Objections

- The meaning of the reference to private spaces needs clarification.

Inspector's Reasoning and Conclusions

4.8.1. Clarification has been provided in the RDD.

RECOMMENDATION

4.8.2. I recommend no modification to the RDD.

4.9 PARAGRAPH 4.6

Objections

Peter Convey

766/11/DEP02/04_06

Summary of Objections

- There is no proper reference to the River Cam.

Inspector's Reasoning and Conclusions

4.9.1. This is dealt with in Chapter 3 of this report.

RECOMMENDATION

4.9.2. I recommend no modification to the RDD.

4.10 PARAGRAPH 5.6 (FDD)

Objections

Bidwells Property Consultants

396/39/DEP01/05_06

Summary of Objections

- The status of the report mentioned in sub-paragraph (c) should be explained.

Inspector's Reasoning and Conclusions

4.10.1. The reference to this report has been removed in the RDD.

RECOMMENDATION

4.10.2. I recommend no modification to the RDD.

4.11 PARAGRAPH 4.7

Objections

Cambridgeshire County Council
Peter Convey
Land Securities Group PLC

55/26/DEP02/04_07
766/12/DEP02/04_07
37/2/DEP02/04_P2

Summary of Objections

- The relationship between paragraphs 4.6 and 4.7 is not clear.
- There is no proper reference to the River Cam.
- The assessment of sites for designation, and the application of Policy 4/2 to undesignated areas by paragraph 4.7 (c), are inappropriate.

Inspector's Reasoning and Conclusions

4.11.1. The River Cam is dealt with elsewhere in this report.

4.11.2. Paragraph 4.6 lists some of the types of open space which are protected.

Paragraph 4.7 sets out the 3 categories of area protected, by reference to the Proposals Map and to undesignated areas which meet the necessary criteria. It is perfectly reasonable for areas designated on the Proposals Map to be protected, and vice-versa. Similarly, as the Council is not aware of every individual area of open space in the City, and as some areas are too small to be shown on the Proposals Map, 4.7(c) rightly applies to undesignated areas the protection of Policy 4/2 where the area meets the criteria which establish that it has value as open space. The criteria for assessment are given in Appendix B to the Plan (see below). The application of the criteria is basically a site specific matter.

RECOMMENDATION

4.11.3. I recommend no modification to the RDD.

4.12 PARAGRAPH 4.8

Objections

Peter Convey

766/13/DEP02/04_08

Summary of Objections

- There is no proper reference to the River Cam.

Inspector's Reasoning and Conclusions

4.12.1. This is dealt with elsewhere in this report.

RECOMMENDATION

4.12.2. I recommend no modification to the RDD.

4.13 PARAGRAPH 5.8 (FDD)

Objections

Bidwells Property Consultants

396/40/DEP01/05_08

Summary of Objections

- The timing and status of open space assessments/strategies is queried.

Inspector's Reasoning and Conclusions

4.13.1. The wording in 2 relevant paragraphs has been clarified and updated in the RDD.

RECOMMENDATION

4.13.2. I recommend no modification to the RDD.

4.14 PARAGRAPH 4.9

Objections

North Newnham Residents Association
Clerk Maxwell Road Residents Association
Bulstrode Gardens Residents Association
Penny Heath

678/1/DEP02/04_09
795/6/DEP02/04_09
796/1/DEP02/04_09
832/8/DEP02/04_09

Summary of Objections

- It should be left to paragraph 4.7 alone to determine whether an open space should be protected from development, and paragraph 4.9 should be deleted.
- Proposal Site 7.07 should be Protected Open Space.

Inspector's Reasoning and Conclusions

4.14.1. As paragraph 4.9 says, the Open Space and Recreation Strategy assesses sites identified (as Protected Open Space) on the Proposals Map. Paragraph 4.7 does not contain such assessments, or criteria for assessment – nor could it without becoming over-lengthy. Local Plans themselves do not normally include site specific open space assessments, again for reasons of length. The inclusion of the assessments in another public document enables interested parties to have access to the Council's reasoning in relation to open space designations.

4.14.2. Site 7.07 is dealt with in Chapter 7 of this report, under Policy 7/6.

RECOMMENDATION

4.14.3. I recommend no modification to paragraph 4.9 of the RDD.

4.14.4. My recommendation regarding Site 7.07 is given in Chapter 7 of the report.

4.15 PARAGRAPH 4.10

Objections

The Perse School For Boys
Peter Convey

754/6/DEP02/04_10
766/14/DEP02/04_10

Pre-Inquiry Changes: SC4.004

Summary of Objections

- The final sentence of the paragraph is unclear.
- There is no proper reference to the River Cam.

Inspector's Reasoning and Conclusions

4.15.1. The final sentence of the paragraph is proposed by the pre-inquiry change for deletion. The River Cam is dealt with in Chapter of this report.

RECOMMENDATION

4.15.2. I recommend that the RDD be modified by the inclusion of SC4.004.

4.16 POLICY 3/16 (FDD) AND POLICY 4/3 (RDD)**Objections**

Cambridge Preservation Society	26/18/DEP01/03_P16
Cambridgeshire County Council	55/25/DEP01/03_P16
Bidwells Property Consultants	396/20/DEP01/03_P16
Trumpington Environmental Action Group (TEAG)	460/9/DEP01/03_P16
North Newnham Residents Association	678/8/DEP01/03_P16
English Heritage	338/16/DEP02/04_P03
GO-East	383/4/DEP02/04_P03
Trumpington Environmental Action Group (TEAG)	460/8/DEP02/04_P03
	460/33/DEP02/04_P03
Peter Convey	766/5/DEP02/04_P03

Summary of Objections

- The Policy is unclear and does not offer proper protection for green corridors, wildlife corridors, the River Cam, and roadside features.
- The Policy protects features of only minor significance and imposes onerous requirements.
- Various detailed additions to the Policy and reasoned justification are suggested.

Inspector's Reasoning and Conclusions

4.16.1. The Policy is appropriately located in the Chapter. The earlier parts of the Chapter are concerned with strategic matters but this Policy is one of several dealing with site specific controls, coming later in the Chapter.

4.16.2. The Policy has been re-written in the RDD. Its wording clearly relates to the protection and enhancement of features of the landscape which are of amenity or nature conservation importance. Not all such features are located in designated sites. However the important elements which objectors fear are not covered by the Policy would be protected where they are of amenity or nature conservation importance. This would cover the River Cam, upon which I also comment in Chapter 3 above.

4.16.3. The wildlife value of the Southern Fringe green corridor is recognised in the Plan, for example in paragraph 9.24. There are also references to the value of corridors, included in the Green Belt, which penetrate the urban area. Paragraph 2.11 of the Plan seeks to protect and enhance existing green spaces, and improve their biodiversity and their accessibility to the community. This objective is part of the Plan's Spatial Strategy and as such is intended to bestow on biodiversity the importance given to it in the existing Local Plan.

4.16.4. Detailed matters raised by objectors are dealt with in other parts of the RDD. In particular Policy 3/4 requires new development to respond positively to existing historic features, so this matter does not need repetition in Policy 4/3.

4.16.5. There is no need to add further to these references and protective elements of the Plan.

4.16.6. Mitigation of the adverse effects of a development on nature conservation interests, through reinstatement or replacement of the affected feature, is likely to

require long term management in order to ensure no net loss of nature conservation value. I do not consider this places onerous burdens on developers in principle. The length of time covered by any management plan would be subject to negotiation.

RECOMMENDATION

4.16.7. I recommend no modification to the RDD.

4.17 PARAGRAPH 4.11

Objections

English Heritage

338/17/DEP02/04_11

Summary of Objections

- There should be a reference to the Historic Landscape Characterisation database.

Inspector's Reasoning and Conclusions

4.17.1. This reference would be added to paragraph 3.8 by a proposed change (see Chapter 3 above).

RECOMMENDATION

4.17.2. I recommend no modification to the RDD.

4.18 PARAGRAPH 4.12

Objections

John de Bruyne

770/4/DEP02/04_12

Summary of Objections

- Anstey Hall Farm should be omitted from the Green Belt.

Inspector's Reasoning and Conclusions

4.18.1. This is an omission site and the objections relating to it are considered in the Housing Chapter of this report. Paragraph 4.12 is not concerned with the Green Belt.

RECOMMENDATION

4.18.2. I recommend no modification to the RDD.

4.19 PARAGRAPH 4.14

Objections

Summary of Objections

- Moored boats narrow the River Cam, affect water flow, and cause silting.

Inspector's Reasoning and Conclusions

4.19.1. Policy 4/3 protects the River as a feature of amenity and nature conservation value.

RECOMMENDATION

4.19.2. I recommend no modification to the RDD.

4.20 POLICY 3/17 (FDD) AND 4/4 (RDD)

Objections

Cambridge Preservation Society	26/19/DEP01/03_P17
Turnstone Estates	47/8/DEP01/03_P17
Cambridgeshire County Council	55/26/DEP01/03_P17
The Wildlife Trust	382/7/DEP01/03_P17
Dernford (Regent) Ltd	391/8/DEP01/03_P17
Bidwells Property Consultants	396/21/DEP01/03_P17
Dr. F. & Mrs. M. Wilson	563/1/DEP01/03_P17
Januarys	691/3/DEP01/03_P17
J.C.S. Mott	59/1/DEP02/04_P04
The Perse School for Boys	754/7/DEP02/04_P04

Summary of Objections

- The Policy should not apply to trees of little worth.
- The Policy should be deleted, toned down, or otherwise altered.
- Particular groups of trees should be protected.
- Replacement tree planting should always be required, or should favour native tree species in the main.

Inspector's Reasoning and Conclusions

4.20.1. Not all trees make a material contribution to amenity: they may be too young, damaged or diseased. In my view only trees of value should be protected by Plan policy. The principal type of value will be amenity value, although some trees have other types of value, e.g. for historical or biodiversity reasons. However a policy of this kind is necessary as many trees are important to the appearance and character of particular areas.

4.20.2. The preservation of specific trees is not the province of the development plan.

4.20.3. The term "public benefits" is appropriately used in the Policy but the suggestion that the Policy should contain a presumption against development in certain circumstances is to import too strong a test into the Policy.

4.20.4. Replacement planting would not always be necessary, depending on the merits of the case. Similarly the nature of such planting should not be specified in

the Plan, because the circumstances of particular proposals differ.

4.20.5. The RDD Policy does not repeat the wording in paragraph 4.19.

RECOMMENDATION

4.20.6. I recommend that the RDD be modified by the addition to Policy 4/4 of the words “----- of amenity or other value-----” after “trees” in line 3.

4.21 POLICY 5/6 (FDD) AND POLICY 4/6 (RDD)

Objections

Cambridgeshire County Council
Land Securities Group PLC
Jonathan Larmour

55/32/DEP01/05_P06
37/3/DEP02/04_P06
776/4/DEP02/04_P06

Summary of Objections

- The Plan does not identify key habitats and develop policies for the protection of species.
- The locally designated sites are not based on up-to-date survey data. The criteria for designation are too easily satisfied. None of the former Blue Circle site should be designated under this Policy.
- Development affecting local sites harms amenity.

Inspector's Reasoning and Conclusions

4.21.1. Designated sites are protected, together with features of nature conservation importance outside designated sites. The development of more detail can be left to SPD. I consider species protection below.

4.21.2. The designation of sites of local importance for nature conservation is based on survey data from 1998-2000 for most sites, although some earlier surveys identified sites for previously-produced documents like the existing Local Plan. This material is up-to-date in my view. I deal with the criteria for assessment of open space on wildlife grounds below, in Chapter 11. The criteria for the designation of City Wildlife Sites are part of the existing Local Plan, and not part of the RDD. It was agreed at the inquiry that I have no basis for making specific recommendations in relation to them.

4.21.3. I consider the Phase II part of the former Blue Circle land as a housing omission site in Chapter 5. There I conclude that the Phase II site should continue to be designated under Policy 4/6. The Lakes site has only recently been surveyed. There are several habitat types present in a mosaic of habitats. It seems to me that the size of the site, with its 2 lakes and surrounding land and vegetation, is an important consideration too. The lakes are sited within a large series of open areas linked by a brook. In my opinion this gives the site significance as part of a network of sites. There is evidence that the Lakes area is likely to be amongst the most species-rich areas in the City. The City Wildlife Site designation is appropriate.

4.21.4. The locally designated sites are also Protected Open Space and so potential damage to local amenity from development is recognised in Policy 4/2.

RECOMMENDATION

4.21.5. I recommend no modification to the RDD.

4.22 PARAGRAPH 4.26

Objections

The Wildlife Trust

382/14/DEP02/04_26

Summary of Objections

- More flexibility should be allowed in the design of mitigation and compensation measures.

Inspector's Reasoning and Conclusions

4.22.1. The paragraph does appear to be too reliant on translocation to secure mitigation and compensation for nature conservation losses. Translocation is not sufficiently reliable to bear the apparent weight placed on it by the existing wording. Some of the additional wording suggested by the objector would introduce more flexibility.

RECOMMENDATION

4.22.2. I recommend that the RDD be modified by rewording the last part of the first sentence of paragraph 4.26 as follows:

"----- equal worth through appropriate habitat management, enhancement and creation, and relocating flora and/or fauna."

4.23 POLICY 5/7 (FDD) AND POLICY 4/7 (RDD)

Objections

Cambridgeshire County Council
GO-East
GO-East

55/33/DEP01/05_P07
383/29/DEP01/05_P07
383/5/DEP02/04_P07

Summary of Objections

- The Plan does not identify key habitats and develop policies for the protection of species.
- The Policy is unnecessary as it repeats statutory provisions.

Inspector's Reasoning and Conclusions

4.23.1. As the Policy is concerned with sites which support protected species, rather than with the protection of the species themselves, or of individual animals or plants, the Policy should remain. The Policy is also concerned with the imposition of planning conditions and obligations.

RECOMMENDATION

4.23.2. I recommend no modification to the RDD.

4.24 PARAGRAPHS 5.20 (FDD) AND 4.28 (RDD)

Objections

The Wildlife Trust

382/16/DEP01/05_20
382/16/DEP02/04_28

Pre-Inquiry Changes: SC4.003

Summary of Objections

- The paragraph should be reworded to make it factually accurate.

Inspector's Reasoning and Conclusions

4.24.1. The majority of necessary changes were made to the RDD, but a proposed change has also been put forward by the Council to achieve complete accuracy.

RECOMMENDATION

4.24.2. I recommend the modification of the RDD by the incorporation of SC4.003.

4.25 PARAGRAPH 4.29

Objections

GO-East

383/12/DEP02/04_29

Summary of Objections

- The paragraph appears incongruous, and should be raised to policy status.

Inspector's Reasoning and Conclusions

4.25.1. The paragraph appears to me to make sense. Together with paragraph 4.30 it expresses a policy intent to protect certain habitats, reflecting elements of Chapter 7 of the Structure Plan. The paragraph should be given the status of a policy. In fact the paragraph introduces a new topic, which deserves a section of its own within the Chapter. Consequent minor amendments to wording of supporting material, and the introduction of a cross-reference, would also be necessary.

RECOMMENDATION

4.25.2. I recommend that the RDD be modified as follows:

- a) add a new policy 4/8 after existing paragraph 4.31, entitled "Local Biodiversity Action Plans", to read "Rare or vulnerable habitats identified in Cambridgeshire's Local Biodiversity Action Plans, and habitats which support species identified in those Plans, will be protected from harmful development. Such development will not be permitted unless the need for it outweighs the harmful effects. Where such development is permitted, proposals should**

include measures to minimise harm and mitigate the harmful impacts.”

b) relocate paragraph 4.29 to follow new Policy 4/8, delete the first 2 words from the paragraph, and include a cross-reference to existing paragraph 4.30.

c) re-number Policies and paragraphs as necessary.

4.26 PARAGRAPH 4.30

Objections

Cambridgeshire County Council

55/30/DEP02/04_30

Summary of Objections

- Planning conditions/obligations would not prevent harm where harmful development has to be allowed.

Inspector's Reasoning and Conclusions

4.26.1. The wording of the end of the paragraph is intended to convey the message that conditions would prevent harm overall.

RECOMMENDATION

4.26.2. I recommend no modification to the RDD.

4.27 PARAGRAPH 4.31

Objections

The Wildlife Trust

382/19/DEP02/04_31

Pre-Inquiry Changes: SC4.005

Summary of Objections

- A correction of an error is suggested.

Inspector's Reasoning and Conclusions

4.27.1. There is a clear error in the RDD here and this should be put right.

RECOMMENDATION

4.27.2. I recommend that the RDD be modified by the incorporation of SC4.005.

4.28 POLICY 3/19 (FDD)

Objections

Countryside Properties
English Heritage
GO-East

68/2/DEP01/03_P19
338/11/DEP01/03_P19
383/16/DEP01/03_P19

Summary of Objections

- The Policy repeats statutory provisions.
- Minor changes would correct inaccuracies/omissions.

Inspector's Reasoning and Conclusions

4.28.1. The Policy sets out succinctly how development affecting Scheduled Ancient Monuments in the City, and their settings, will be controlled.

RECOMMENDATION

4.28.2. I recommend no modification to the RDD.

4.29 PARAGRAPH 4.34

Objections

English Heritage

338/18/DEP02/04_34

Pre-Inquiry Change: SC3.005

Summary of Objections

- There should be a reference to the Historic Landscape Characterisation of Cambridgeshire.

Inspector's Reasoning and Conclusions

4.29.1. The work referred to in the objection will help in the understanding of the historical context of monuments. The necessary modification should be made, but to paragraph 3.12, which deals with development context. The Council puts forward proposed change SC3.005, with which I concur.

RECOMMENDATION

4.29.2. I recommend that the RDD be modified by the incorporation of SC3.005.

4.30 POLICY 3/20 (FDD) AND POLICY 4/9 (RDD)

Objections

Countryside Properties
English Heritage
Network Rail
GO-East
Cllr John Durrant

68/3/DEP01/03_P20
338/13/DEP01/03_P20
370/4/DEP01/03_P20
383/17/DEP01/03_P20
838/1/DEP02/04_P09
838/2/DEP02/04_P09

Pre-Inquiry Changes: SC4.006**Summary of Objections**

- The Policy repeats statutory provisions.
- A Policy should encompass changes of use affecting Listed Buildings.
- Operational requirements sometimes make it necessary to alter or demolish a listed structure.
- Demolition works should not be permitted.
- The final section of the Policy should be strengthened.

Inspector's Reasoning and Conclusions

4.30.1. The Policy sets out clearly how development affecting Listed Buildings in the City will be controlled. Changes of use are potentially significant developments which could affect Listed Buildings, and should be referred to in the Policy. Details of material which should be supplied with planning applications should not be set out in the Plan, in the interests of brevity.

4.30.2. There are circumstances where demolition works would be allowable. It is right for the Policy to say so, and the Policy does this. The final section of the Policy is clear and enables a balance to be struck between the harm and benefits of demolition in appropriate circumstances.

4.30.3. I note that proposed change SC4.006 has been put forward in response to an objection which has been withdrawn. However the reference to setting in the Policy reflects the importance which Listed Building settings have, and I conclude that the proposed change should be made.

RECOMMENDATION

4.30.4. I recommend that the RDD be modified by the incorporation of SC4.006.

4.31 POLICY 3/21 (FDD) AND POLICY 4/10 (RDD)**Objections**

Cambridge Preservation Society	26/20/DEP01/03_P21
Countryside Properties	68/4/DEP01/03_P21
The House Builders Federation	362/7/DEP01/03_P21
Network Rail	370/5/DEP01/03_P21
GO-East	383/18/DEP01/03_P21
Ventress Property Developments Limited	690/3/DEP01/03_P21
English Heritage	338/20/DEP02/04_P10
Bidwells Property Consultants	396/1/DEP02/04_P10
Jonathan Larmour	776/5/DEP02/04_P10

Pre-Inquiry Changes: SC4.007**Summary of Objections**

- The Policy merely repeats statutory provisions.
- The Policy is too harsh or restrictive in various respects.

- Further matters should be included in the Policy.
- Development which contrasts with the character of a Conservation Area should not be permitted.
- Conservation Areas should be reviewed.

Inspector's Reasoning and Conclusions

4.31.1. The Policy sets out succinctly how development affecting Conservation Areas in the City, and their settings, will be controlled.

4.31.2. The retention of features which contribute to character or appearance is a worthwhile objective in such areas and the Policy wording which requires this should not be weakened. Other material considerations, such as wider public benefits from development, or the necessary locations for accesses, will be weighed in the balance in the consideration of individual proposals.

4.31.3. As it is the character or appearance of a Conservation Area which matters, both these factors should appear in the Policy, as proposed change SC4.007 intends. However the proposed change should be applied to both parts a and b of the Policy, where in the RDD character alone is mentioned. In the RDD the Policy applies to extensions as well as new buildings.

4.31.4. Conservation Areas are a key part of Cambridge's historic importance. Paragraph 4.18 of PPG15 says that local authorities will often need to ask for detailed plans and drawings of proposed new development. In my view the Policy's bar on outline applications in Conservation Areas is justified. Its inclusion in the Policy is likely to be more useful to applicants than its relocation to supporting text.

4.31.5. It is not always necessary for development to preserve the character or appearance of a Conservation Area: development may also, or instead, enhance the area. Enhancement can be achieved by imaginative designs which provide a successful contrast with their context, and this can be seen in the historical development of some of the areas which are now Conservation Areas. The reference to "successful contrast" is not inappropriate.

4.31.6. PPG15, at paragraph 2.9, indicates that plans should set out authorities' broad criteria for designating and reviewing Conservation Areas. The RDD does not do this. I do not have the evidence to enable me to advise on the criteria which should be adopted in Cambridge. The Council might like to consider this matter when preparing DPDs. The review of particular areas is not a matter for the RDD.

RECOMMENDATION

4.31.7. I recommend that the RDD be modified by the insertion of "or appearance" after the word "character" in parts a and b of Policy 4/10.

4.32 PARAGRAPH 3.72 (FDD)

Objections

Ventress Property Developments Limited

690/1/DEP01/03_72

Summary of Objections

- The demolition of unlisted buildings in Conservation Areas should not be subject to the same tests as the demolition of Listed Buildings.

Inspector's Reasoning and Conclusions

4.32.1. The RDD follows advice in paragraph 4.27 of PPG15.

RECOMMENDATION

4.32.2. I recommend no modification to the RDD.

4.33 POLICY 3/22 (FDD) AND POLICY 4/11 (RDD)

Objections

Peterhouse	71/1/DEP01/03_P22
Camstead Homes	74/7/DEP01/03_P22
The Bursars' Committee of the Cambridge Colleges	87/10/DEP01/03_P22
English Heritage	338/14/DEP01/03_P22
James Development Co. Ltd	378/6/DEP01/03_P22
St John's College	81/1/DEP02/04_P11
The Bursars' Committee of the Cambridge Colleges	87/1/DEP02/04_P11
Bidwells Property Consultants	396/2/DEP02/04_P11

Pre-Inquiry Change: FPC18

Summary of Objections

- This Policy is too onerous. It should take a more flexible and positive approach.
- The Policy should be strengthened by the addition of an introductory sentence.
- The whole matter of Buildings of Local Interest should be reviewed.

Inspector's Reasoning and Conclusions

4.33.1. Some of the objections have been met in part by changes introduced in the RDD. The settings of these buildings are not protected, and an introductory sentence has been inserted to make it clear that the buildings do not have the status of Listed Buildings, but merit protection. I agree with the Council that the Policy is worthy of inclusion in the Plan. The buildings contribute to the character and distinctiveness of an important City. Their contribution in this regard merits protection from demolition and harmful alteration. In more detail, the wording of the second sentence of the Policy is appropriate to the control of demolition but too restrictive in relation to alterations, especially alterations to buildings which are not included on the statutory list. The Council's suggested altered wording is better. Reference to internal works is not necessary.

4.33.2. A Policy based on the Council working with applicants would weaken the protection of the buildings, and would merely be an expression of intent.

4.33.3. The 'listing' of these buildings has been subject to public participation. I cannot comment upon whether the number of buildings the Council considers are of local interest is reasonable or accurate. Further information on who holds the 'list', and where, would lengthen the Plan.

RECOMMENDATION

4.33.4. I recommend that the RDD be modified by the deletion from the second sentence of Policy 4/11 of the reference to alteration, and by the incorporation of FPC18.

4.34 PARAGRAPHS 3.74 (FDD), 4.42 AND 4.43 (RDD)

Objections

Camstead Homes
James Development Co. Ltd
The Bursars' Committee of the Cambridge Colleges
The Bursars' Committee of the Cambridge Colleges

74/6/DEP01/03_74
378/7/DEP01/03_74
87/9/DEP02/04_42
87/10/DEP02/04_43

Summary of Objections

- A 'local list' has not been prepared.
- Paragraph 3.74 (now 4.42) should say that the buildings do not meet current criteria for statutory listing.
- Paragraphs 4.42 and 4.43 should not mention the preparation of a list of Buildings of Local Interest.

Inspector's Reasoning and Conclusions

4.34.1. The list, and associated preparatory and supporting work, have been completed and consulted upon. The meaning of paragraph 4.42 is clear and there is no need to change it. However in view of the completion of work on the list paragraph 4.43 can be brought up to date as suggested by the Council. I have made minor amendments to the Council's suggested change.

RECOMMENDATION

4.34.2. I recommend that the RDD be modified by the deletion of paragraph 4.43 and its replacement by the following:

"Guidance on the approach to be adopted when considering works to such buildings, and the criteria by which buildings will be added to the list in future, were produced and agreed by the Council as material considerations in 2005."

4.35 POLICY 3/2 (FDD) AND POLICY 4/12 (RDD)

Objections

English Heritage
Bidwells Property Consultants
Trumpington Environmental Action Group (TEAG)

338/3/DEP01/03_P02
396/12/DEP01/03_P02
460/34/DEP02/04_P12

Summary of Objections

- The Policy should encompass the whole environment and "significant" should be deleted.
- The positive form of the Policy has led to clumsy English.

- The Policy is weakened by its section b. A wording change is suggested.

Inspector's Reasoning and Conclusions

4.35.1. In the RDD the Policy does encompass the whole environment. Otherwise, most of the suggested wording changes are in my opinion too minor to affect the operation of the Policy. Generally, they offer no advantages over the existing expression of the Policy. However, a simple change to the final sentence of the Policy would improve the English.

RECOMMENDATION

4.35.2. I recommend that the RDD be modified by the deletion of the final sentence of Policy 4/12 and its replacement by:

"Proposals that are sensitive to pollution, and located close to existing pollution sources, will be permitted only where adequate pollution mitigation measures are provided as part of the development package."

4.36 PARAGRAPH 3.12 (FDD)

Objections

Bidwells Property Consultants

396/13/DEP01/03_12

Summary of Objections

- The Plan should not appear to trespass into areas subject to other statutory controls.

Inspector's Reasoning and Conclusions

4.36.1. The paragraph does not appear to me to give the impression complained about. The principal burden of the paragraph is that other agencies will be consulted when necessary.

RECOMMENDATION

4.36.2. I recommend no modification to the RDD.

4.37 POLICY 3/3 (FDD)

Objections

Cambridgeshire County Council

55/23/DEP01/03_P03

Summary of Objections

- The Policy should also cover development outside Air Quality Management Areas but which could have an impact on such areas.

Inspector's Reasoning and Conclusions

4.37.1. The Policy wording is based on national policy and should not be changed.

Nevertheless the Council has made a suitable reference in the supporting text.

RECOMMENDATION

4.37.2. I recommend no modification to the RDD.

4.38 POLICY 4/14

Objections

The Perse School for Boys

754/8/DEP02/04_P14

Summary of Objections

- Harm from lighting sports pitches should be balanced against community benefits.

Inspector's Reasoning and Conclusions

4.38.1. The Policy seeks to minimise the impact from lighting and is not expressed in a negative fashion. The benefits of lighting sports pitches would automatically be taken into account and need not be mentioned in the Policy.

RECOMMENDATION

4.38.2. I recommend no modification to the RDD.

4.39 POLICY 3/15 (FDD)

Objections

Network Rail
Bidwells Property Consultants

370/2/DEP01/03_P15
396/19/DEP01/03_P15

Summary of Objections

- The Policy merely rehearses national policy.
- Essential infra-structure should be permitted in flood plains.

Inspector's Reasoning and Conclusions

4.39.1. The Policy should be retained because of the risk of flooding from the River Cam and its tributaries. In many places the flood plain is directly adjacent to the built-up area.

4.39.2. Paragraph 4.57 refers to some of the circumstances in which development would be permitted and further detail is unnecessary.

RECOMMENDATION

4.39.3. I recommend no modification to the RDD.

4.40 PARAGRAPH 4.56

Objections

Countryside Properties
Addenbrooke's NHS Trust
Countryside Properties & Liberty Property Trust

68/3/DEP02/04_56
399/4/DEP02/04_56
837/3/DEP02/04_56

Summary of Objections

- The extent of Flood Zones is not reliable on a site specific basis, especially in the Southern Fringe. Allocated sites within Flood Zones should not be subject to an initial presumption against development.

Inspector's Reasoning and Conclusions

4.40.1. The Flood Zone information comes from the Environment Agency. The Proposals Map and paragraph 4.56 both contain references to the Agency's website and no other qualification of the information is needed. Allocations are based on earlier data, so it would be inadvisable to reword the paragraph to suggest that development might take place on land which could flood. Developers will be required to carry out a site based Flood Risk Assessment. Paragraph 4.56 explains how the initial presumption against development in Flood Zones might be overcome, in line with Policy 4.15. Paragraph 4.57 makes it plain that not all development in Flood Zones will be prevented.

RECOMMENDATION

4.40.2. I recommend no modification to the RDD.

4.41 PARAGRAPH 3.47 (FDD)

Objections

Cambridge Preservation Society

26/16/DEP01/03_47

Summary of Objections

- Developments must avoid reducing the flood storage capacity of the flood plain.

Inspector's Reasoning and Conclusions

4.41.1. This matter is adequately covered both in the relevant paragraph and in Policy 4/15.

RECOMMENDATION

4.41.2. I recommend no modification to the RDD.

4.42 PARAGRAPH 3.49 (FDD)

Objections

Cambridge Preservation Society

26/17/DEP01/03_49

Summary of Objections

- The paragraph is redundant.

Inspector's Reasoning and Conclusions

4.42.1. Recognition of the Environment Agency as a key consultee is desirable.

RECOMMENDATION

4.42.2. I recommend no modification to the RDD.

4.43 PARAGRAPH 4.62

Objections

The Bell Educational Trust

83/3/DEP02/04_62

Summary of Objections

- Drainage systems should be adopted by the relevant authority.

Inspector's Reasoning and Conclusions

4.43.1. The development plan cannot force water companies or other agencies to adopt drainage systems put in place to accommodate new developments.

RECOMMENDATION

4.43.2. I recommend no modification to the RDD.

4.44. OMISSION SITE 19 – HOMERTON COLLEGE, PROTECTED OPEN SPACE

Objections

The objections to this aspect of the plan are listed in Annex 3.

Summary of Objections

- Land at Homerton College should not be designated as protected open space.

Inspector's Reasoning and Conclusions

4.44.1. This site has been identified by the Council in its Open Space and Recreation Strategy (CD 5.4.1) as having both environmental and recreational importance. Notwithstanding that there are only limited public views of the site, in my opinion the open space benefits not only the staff and students at the College but also nearby residents. No convincing evidence has been produced to suggest that the Council was wrong in its assessment of the value of this site. There has been no assessment of the need for open space in this location, and removing the protection from the site would therefore conflict with the aims of PPG17.

4.44.2. A number of the objections to the proposed change in designation are

effectively objections to the possibility of development within the site, and there is no such proposal before the Local Plan Inquiry. The Council has pointed out that the plan does not impose a complete embargo on any development within the designated area, although retaining the designation of protected open space will limit the development that can take place.

RECOMMENDATION

4.44.3. I recommend no modification to the RDD.

5. LIVING IN CAMBRIDGE

INSPECTOR'S NOTE

The Plan has been prepared against the background of national guidance in PPG3 "Housing", published in March 2000. Since the Inquiry closed the government has published a draft replacement, PPS3 "Housing", which sets out significant proposed changes to the planning and delivery system for housing with the aim of ensuring that everyone has the opportunity of living in a decent home, which they can afford, in a community where they want to live. In the context of proposed changes to the strategic planning process, the government is keen to deliver a better balance between housing demand and supply in every housing market, and to improve affordability where necessary, as well as creating sustainable, inclusive and mixed communities.

This document is subject to consultation with the full range of interested parties, and is a material consideration in the assessment and analysis of the presently proposed Plan policies. Although the emerging PPS3 is a material consideration, I am able to give it only the weight which is appropriate to the early stage which has been reached in the preparation processes. The imminence of published new national guidance is such that it is likely that the Council will need to review its policies for overall housing provision and delivery in general, and for affordable housing in particular, at an early stage as part of the new LDF system.

5.1 WHOLE CHAPTER

Objections

Adrian Kent
H M Prison Service
J Fuller

330/1/DEP01/04
385/1/DEP01/04
558/1/DEP01/04

Summary of Objections

- There should be a radical reconsideration of housing provision, with far fewer new homes being built on Green Belt land and high quality liveable family dwellings being preferred for brownfield sites.
- The Plan should allocate a site for a new prison, or include a policy allowing a proposal to come forward speedily should a suitable site be identified.

- The University and Colleges should be prevented from replacing residents in the historic centre of Cambridge with students, because of the effect on the viability of the City Centre.

Inspector's Reasoning and Conclusions

5.1.1. The Local Plan is required to be consistent with RPG 6 and the Structure Plan. The allocations of land for housing in the Plan are intended to meet the requirements placed on the City by these documents, and in particular by the Structure Plan. If the strategy proposed in the first bullet point were to be adopted in the Plan, then it would not be consistent with regional and strategic policy guidance.

5.1.2. During the period of consultation leading to publication of the RDD, no potential site that might be suitable for a prison has been identified within the Plan area. According to the Council, land values in the area are very high and there is a high demand for land for new dwellings and other competing land uses. This is reflected in the requirements of Structure Plan Policy P9/7, which aims at the selective management of the local economy by reserving employment land in the area for development that can demonstrate a clear need to be located there, in order to serve local requirements or contribute to the continuing success of the Sub-Region as a centre of high technology and research. Under these circumstances, it seems unlikely that a suitable site for a prison that would meet the criteria set out in Circular 3/98 "Planning for Future Prison Development" could be identified within such a compact and constrained local authority area.

5.1.3. HM Prison Service proposes that the Plan should establish a policy framework to allow any proposals for a prison to come forward. But no detailed policy wording has been suggested, and in the absence of any convincing evidence indicating any likelihood of identifying a suitable site in the Plan area, I am not satisfied that the inclusion in the Plan of a criteria-based policy is justified. In the unlikely event of a site being identified outside the local Plan process, it would need to be treated as a departure from the current Plan in the usual way, as Circular 3/98 recognises.

5.1.4. The Council has only limited control over changes of occupation of residential properties within the historic centre to student occupation, as in many instances there will be no change of use requiring planning permission. However, notwithstanding that for several months of the year student accommodation is unlikely to be occupied, the very high level of residential accommodation within the City Centre contributes to the viability of what is clearly a busy and lively centre. In addition, Policy 5/3 aims for the return to housing of buildings originally built as housing but currently in a non-residential use. Although local residents regret the loss of town centre housing to student accommodation, in planning terms this process, which appears to have been continuing over a long period of time, is not likely to undermine significantly the viability of the City Centre.

RECOMMENDATION

5.1.5. I recommend no modification to the RDD.

OBJECTIVES

5.2 OBJECTIVE 1

Objections

Summary of Objections

- Objective 1 should make it clear that the City is not providing for all the needs of the Sub-Region.

Inspector's Reasoning and Conclusions

5.2.1. The Council has accepted that the wording of the objective as it appears in the FDD could be improved, and the objective in the RDD is now to "contribute to meeting the needs of the Cambridge Sub-Region".

RECOMMENDATION

5.2.2. I recommend no modification to the RDD.

HOUSING

5.3 POLICY 4/1 (FDD) AND POLICY 5/1 (RDD)

Objections

The objections to this aspect of the Plan are listed in Annex 3.

Summary of Objections

- The housing requirement is too high. The Council should resist outside pressures for growth, and concentrate on higher density urban schemes.
- There are unjustifiable differences compared with the Structure Plan.
- The Local Plan housing supply is not achievable, and the Plan does not show how it could be achieved. Individual elements of the supply are criticised.
- The sites included in the elements of supply should be specified, with their capacities and anticipated dates for construction.
- Policy wording restricts the ability of owners to develop commercial sites.
- Objections are made to site allocations and omissions.

Inspector's Reasoning and Conclusions

The Structure Plan

5.3.1. The housing requirement is set by the Structure Plan and it is not for me to raise again arguments about growth, its strategic distribution, and the role of Cambridge, which were considered in the preparation of that Plan and earlier strategic work. The Structure Plan also identifies particular areas for development, and the Local Plan must be in conformity with the Structure Plan. Hence the draft Local Plan rightly proposes major development at locations like the Southern Fringe and in North-West Cambridge. Otherwise my comments on the allocations and omission sites are made elsewhere in this report, with one minor exception discussed below.

5.3.2. However, I can add here that the RDD does rely on substantially higher densities for housing development, and on the use of previously developed land, to help in meeting the housing requirement. There is no need to repeat the density

policies of national guidance and the Structure Plan. The proposed change to paragraph 3.6(b), giving priority to previously developed land, accords with national policy but cannot delay the release of land in urban extensions identified in the Structure Plan.

5.3.3. The Structure Plan sets out a house building requirement for Cambridge City of 12,500 additional homes 1999-2016, 6,500 within the built-up area and 6,000 on the edge of Cambridge. The requirement is not to be regarded as a ceiling or cap, as the housing figures for each District are described as "indicative". By the same token the housing figure for Cambridge should not be treated as being a minimum. In my view the figure should be met as nearly as possible, but some latitude both above and below the figure is allowed. The use of the word "approximately" to qualify the new dwelling totals in Policy 5/1 is appropriate, and does not suggest that the totals are rigidly fixed.

5.3.4. In this context, and as background to what follows in this report, my recommendations are likely to result in some additional housing supply, for example from the higher proportion of market houses on the University land south of Huntingdon Road. This gives comfort, should some of the complex sites allocated fail to come forward in the Plan period.

5.3.5. It has been suggested that the Housing Needs Survey reveals such a high level of need that the housing requirement is actually higher than that included in the RDD. It seems to me that this argument seeks to go behind the Structure Plan requirement, but it is the latter which the RDD must meet, and not a figure which is based on the inclusion of other data.

5.3.6. I consider that the Structure Plan reference to "additional homes" does not render objectionable the RDD use of "dwellings" in calculating and describing its housing supply. Other apparent differences from the Structure Plan, included in Policy 4/1, have been omitted from the RDD. The RSS is, at the time of writing, in draft form and the RDD should not be modified to accord with a document which could change. Suggestions that the Sub-Regional housing context be reviewed, that more land be released in South Cambridgeshire, or that particular sites in South Cambridgeshire be supported, are not for me. The evidence regarding alleged delays in bringing forward sites in South Cambridgeshire comes only from part of the development industry. It does not allow me to reach reliable conclusions that this is a sound reason for allocating more land in Cambridge City.

The Elements of Supply

5.3.7. The Council has applied a 10% discount to sites with unimplemented planning permission or resolutions to grant permission. The 10% figure is derived from research. The figure should not be applied to sites where construction has started because there is strong evidence that the development of such sites is completed.

5.3.8. The Urban Capacity Study (UCS) undertaken to assist the examination of the Structure Plan estimates the discounted potential capacity of the urban area as 3,671. The Structure Plan EIP Panel Report found the UCS to be sound, and as likely to under-estimate capacity as to over-estimate it.

5.3.9. A discount of 50% has been applied to the redevelopment of many of the sites in existing use. This is based on experience and the UCS suggests that a cautious approach has been taken. Most of the sites are in employment use, and this has been the primary source of urban completions in the City in recent years. The alternative discount of 65% put forward by an objector has no statistical basis, but reflects the highest discount contained in the discount Table in 'Tapping The Potential', which suggests that local authorities tend in fact to under-estimate

dwelling production from various sources.

5.3.10. It is clear that redevelopment for housing, even where land is already in use, is a significant force in Cambridge. Petrol filling stations and other sites can be costly to redevelop but the housing market in the City is buoyant, residential land is valuable, there is a large number of sites, and the Council is in discussion with interested parties with regard to many sites. There are particular difficulties with the redevelopment of the Northern Fringe, but several years are available to Plan and prepare for this development. On the other hand the UCS figure is based on under-estimates for other large sites.

5.3.11. The assumed average density for housing sites in and around the central area is 75 dph, and for areas somewhat further out 55 dph. Objectors consider these figures too high, but they are effectively being achieved. Some Conservation Areas already feature high density housing, even with landscaping and low rise buildings.

5.3.12. High densities are particularly justified in the station area and near the proposed new station in the Northern Fringe, because of the high levels of accessibility to public transport.

5.3.13. I consider that the UCS capacity estimate should not be changed.

5.3.14. It is said by several objectors that the housing totals assumed by the Council for urban extensions are not deliverable. The housing supply is not dependent on production of dwellings on the Airport site during the Plan period: this site is expected to come forward after 2016.

5.3.15. The other urban extensions are being progressed so that construction start dates of 2008 or 2009 in most are feasible. A new access road is needed for the Southern Fringe and a planning application was expected, at the time of my inquiry, in January 2006. Funding is available to the County Council as Highway Authority and developer contributions will be sought. Not all development in the urban extensions is dependent on major infra-structure provision, and there are few relevant flooding problems. As with the Northern Fringe (see above) there are several years available to address problems in principle, and in the case of the urban extensions it is a case of when, not if, development would proceed. Although there are complications with many sites, and further work is needed in the form of Master Plans or similar, I do not consider that it should be assumed at this stage that the urban extensions will be unlikely to produce the proposed numbers of dwellings because of anticipated delays.

5.3.16. As for the possibility that the housing market might not be able to accommodate the anticipated numbers of new houses for sale when the urban extensions come on stream, this objection could apply to omission sites too, depending on when development on them might go ahead. However given the buoyancy of the Cambridge market the situation is unlikely to arise.

5.3.17. The indicative housing densities used by the Council to arrive at a housing supply for the urban extensions are based on the assumptions used in the Cambridge Sub-Region Study. The Study contributed to the Structure Plan. The latter Plan calls for densities to be increased, to at least 40 dph in areas well served by public transport and other facilities, and to significantly higher levels in some areas. Specifically, new development in Cambridge will be high density. The highest densities compatible with maintaining local character should be applied. Relatively low densities have been achieved in the Region but Cambridge is a City with good public transport, services, and existing high density areas. I do not draw a parallel between Cambridge and Cambourne, where the First Secretary of State dismissed an appeal for a housing development in June 2005. Cambridge is a City,

whereas Cambourne is a small town subject to different policies.

5.3.18. In several urban extensions the Council assumes average densities of 45 dph. Given the existing and proposed levels of public transport and other services this is reasonable, in the light of the background of the RDD outlined above. Densities of 65 dph are assumed in other locations nearer existing or proposed centres. I do not consider these densities would harm local character or the setting of the City, in the light of the possibilities for detailed design and landscaping. At East Cambridge, views of the urban edge are not such as to require preservation. The Airport and relatively flat landscape do not provide an important setting for the City. Separation from existing independent settlements will be possible. Some of the development in the Southern Fringe will have the advantage of screening by existing vegetation, and will be seen in the context of the massive buildings of Addenbrooke's Hospital, which provide a visual context for high density development. In my opinion neither area's development would compromise valuable views.

5.3.19. Finally on densities, it is possible to provide SUDS in high density schemes, for example where there is open land nearby or within a scheme. The whole point of high densities is to provide for housing needs in a sustainable way.

5.3.20. The UCS effectively includes windfall sites in its figures. A comprehensive survey of potential sites has been undertaken. Where site survey was not possible/appropriate, and past trends were the only information available for a particular supply source, these trends were used to estimate the capacity of that source. Past trends were also used as a check on the potential of sources where survey has been possible. Additional sites which come forward, which were not identified in the survey, will help to make up the 6,500 dwellings expected from the urban area. Policy 5/1 permits windfall sites to come forward. The tests in this part of the Policy are appropriate. A list of land uses where replacement by housing would not be permitted should not be given: it would introduce too great a level of detail, and individual land uses are subject to other policies of the Plan.

5.3.21. Objectors refer to low rates of housing construction since the beginning of the Plan period in 1999. Until about 2003 dwelling completions were particularly low at 164 per annum, following a recession in the housing market in the late 1990s. The required rate averaged over the whole Plan period is 735pa. A similar rate has however been achieved in 2004/5, and the trend in completions is upwards. The upward trend is only 2 years old, and historical data shows that in earlier periods the City saw completion rates well below that required to meet the Structure Plan figure. From 1 April 2005 the required build rate for urban sites was 425pa, and this was being achieved 2003-5.

5.3.22. However the recent upward trend and historically high figure have been achieved before the release of any of the large urban extensions allocated in the RDD. Land from this source has not yet entered the supply pipeline, but the pipeline does include urban land, especially employment sites to be redeveloped, and the Council's experience is that such sites are developed when permission has been granted.

5.3.23. The actual lead-in times for further planning, gaining permissions, and site preparation/infra-structure provision in the urban extensions are not known, but the Council's estimated start times are given above. In the Southern Fringe planning applications are expected soon. The annual production of dwellings per area and therefore the total annual production post-2008 are likewise unknown at present. The requirement averaged over the remaining Plan period would be high, at about 750pa, but there are several substantial sites upon which to meet it. The Council is working closely with other parties concerned and is well aware of the

urgent need to make progress quickly. There is also a clear need in a buoyant market. Information supplied to the Council by the relevant developers suggests that construction rates could rise to a maximum of 350pa in each Area of Major Change.

5.3.24. With regard to draft PPS3, the allocation of substantial areas of land in a buoyant market area is likely to give people opportunities of living in a decent home where they want to live.

5.3.25. Although the housing figures for the City were being developed during the preparation of the Structure Plan, that Plan was adopted only in late 2003. My conclusion from all of the above is that it is too early to assume that the required completion rate will not be forthcoming. The Council is in a position to monitor the situation and take action should the need for it become apparent. I consider that at present there is no need to allocate additional land, as I am not convinced by the objections that the housing land supply provisions of the RDD are unrealistic.

Other Matters

5.3.26. Table 5.1, rather than Policy 5/1, shows how the housing supply is made up. The entry for the urban extensions does not give the number of dwellings for each proposed extension. Such figures cannot be given as they depend on further work, but indicative capacities are given in Chapter 9 of the Local Plan. In the urban area, the UCS provides much detail on site specific capacities and expected contributions from different categories of site. Details of dwelling capacities and anticipated development dates for all sites do not need to be included in the Plan, and would soon become out of date.

5.3.27. Restrictive wording in Policy 4/1, allowing established firms on proposed housing land only up to 10% additions to floorspace, has been removed from Policy 5/1 in the RDD. This gives more flexibility for investment in their existing sites to firms wishing to remain on proposed housing land. More flexibility, for example to redevelop the sites for retail purposes, would cast doubt on the Plan's ability to produce the requisite number of dwellings. The RDD version of the Policy provides a suitable balance between meeting the housing requirement and allowing successful businesses to invest.

5.3.28. Long term housing land supply, beyond 2016, is provided for by the amount of land which makes up the urban extensions. East Cambridge, for example, includes Cambridge Airport, which is unlikely to be developed for housing before 2016 and will therefore supply land for housing after the Plan period.

5.3.29. One site specific objection is recorded by the Council under Policy 4/1 and nowhere else, so I deal with it here. The site is the Peverel Road allotments, a proposed housing site. Parts of this site are in use as allotments but much is unused. It seems to me that, as the site forms part of the East Cambridge Area of Major Change, there will be ample opportunities to provide replacement allotments. The housing proposal should remain in the Plan.

RECOMMENDATION

5.3.27. I recommend no modification to the RDD.

5.4 PARAGRAPH 4.3 (FDD)

Objections

Summary of Objections

- Several proposed housing sites are actually in existing business use.
- A large part of the Monsanto site is in Class B use and could be redeveloped for housing.

Inspector's Reasoning and Conclusions

5.4.1. The question of the existing business use of housing proposal sites is dealt with in the preceding section of this report. The UCS does indeed rely on housing redevelopment of sites in existing non-residential use, but this is a major source of new housing in Cambridge, and the UCS heavily discounts the potential dwelling production from this source.

5.4.2. The Monsanto site is considered in paragraphs 5.40.1 et seq of this report.

RECOMMENDATION

5.4.3. I recommend no modification to the RDD.

5.5 PARAGRAPH 5.4

Objections

NIAB and others

34/6/DEP02/05_04

Summary of Objections

- It would be helpful to list the extant planning permissions.

Inspector's Reasoning and Conclusions

5.5.1. This information is unnecessarily detailed for inclusion in the Plan, and is a snapshot taken at one point in time. It could soon become out of date. It is, however, included in the UCS.

RECOMMENDATION

5.5.2. I recommend no modification to the RDD.

5.6 TABLE 4.1 (FDD) AND TABLE 5.1 (RDD)

Objections

Taylor Woodrow Developments Limited
 Countryside Properties
 The House Builders Federation
 GO-East
 Bidwells Property Consultants
 Addenbrooke's NHS Trust
 Taylor Woodrow Developments Limited
 NIAB and others

2/1/DEP01/04_T01
 68/12/DEP01/04_T01
 362/33/DEP01/04_T01
 383/20/DEP01/04_T01
 396/24/DEP01/04_T01
 399/4/DEP01/04_T01
 2/12/DEP02/05_T01
 34/10/DEP02/05_T01

Summary of Objections

- Several of the objections to Policies 4/1 and 5/1 are repeated here.
- A 10% discount for sites with planning permission seems high.
- The Plan shows nowhere how the housing requirement will actually be met.
- Footnote 3 to the Table refers to safeguarded land but the Plan does not identify this land or its dwelling capacity, or land safeguarded for non-housing uses.

Inspector's Reasoning and Conclusions

5.6.1. I deal with the matters covered by these objections in various places in this report. The objections to Policies 4/1 and 5/1 are considered in the earlier part of this Chapter, together with discounting dwelling production from different sources. Safeguarded land objections are considered in chapter 4 of this report. RDD paragraph 5.4, including Table 5.1, shows how the housing requirement is met. The components of supply are discussed above, and, for individual Areas of Major Change and proposal sites, in Chapters 9 and 11 of this report. As far as safeguarding land for long term non-housing uses is concerned, the post-2016 needs for such uses are not known.

RECOMMENDATION

5.6.2. I recommend no modification to the RDD.

5.7 POLICY 4/2 (FDD)

Objections

Cambridgeshire County Council
English Heritage
Ventress Property Developments Limited

55/27/DEP01/04_P02
338/15/DEP01/04_P02
690/2/DEP01/04_P02

Summary of Objections

- There is no reference to how the impact of property conversions upon on-street parking is to be assessed.
- The Policy should be cross-referenced to the policies relating to listed buildings and conservation areas.
- The Policy should include an obligation, in the case of conversion of large properties with substantial grounds, to use land within the grounds for housing.

Inspector's Reasoning and Conclusions

5.7.1. There is no need for the Policy to contain details as to how the impact of a conversion would affect on-street parking. To include such detail would add unnecessarily to the length of the Plan. In addition, there is no need to include cross-references in the Policy, given that the Plan should be read as a whole.

5.7.2. Proposals for infill development in the grounds of large properties give rise to different issues from those which arise on proposals to convert large properties into multi-occupation. Other policies in the Plan give adequate guidance as to how infill proposals should be assessed. It would be inappropriate to include a blanket presumption that such infilling would take place, without allowing proposals to be assessed under other parts of the Plan.

RECOMMENDATION

5.7.3. I recommend no modification to the RDD.

5.8 POLICY 4/3 (FDD)

Objections

Peterhouse

71/3/DEP01/04_P03

Summary of Objections

- The Policy should be made more flexible to incorporate alternative uses in certain circumstances, bearing in mind that many properties in the City Centre originally built as dwellings are several hundred years old and may not have been used for housing for many years.

Inspector's Reasoning and Conclusions

5.8.1. The Policy aim of increasing the number of dwellings in the City is, in my view, worthy of support as it is likely to assist in meeting the demand for housing and maintaining the vitality of the City Centre. The Policy already allows for a degree of flexibility. No specific change of wording has been suggested by the objector and it is not clear what circumstances the objector has in mind. It would therefore be difficult to formulate wording that might allow more flexibility without undermining the aims of the Policy. The Policy as worded will not prevent other material considerations being taken into account on a case by case basis.

RECOMMENDATION

5.8.2. I recommend no modification to the RDD.

5.9 POLICY 5/3

Objections

Bidwells Property Consultants

396/3/DEP02/05_P03

Summary of Objections

- The Policy should be prefaced with the words "planning applications for..." in order to make it clear when the Policy would bite.

Inspector's Reasoning and Conclusions

5.9.1. The proposed addition is unnecessary. It does not need to be explicitly stated that the Policy will only bite when a planning application is needed.

RECOMMENDATION

5.9.2. I recommend no modification to the RDD.

5.10 POLICY 4/4 (FDD) AND POLICY 5/4 (RDD)

Objections

Cambridge Preservation Society

26/22/DEP01/04_P04

Camstead Homes

26/33/DEP01/04_P04

James Development Co. Ltd

74/9/DEP01/04_P04

The Bell Educational Trust

378/9/DEP01/04_P04

83/5/DEP02/05_P04

Summary of Objections

- A minor word change to the FDD Policy 4/4 is suggested. There should also be a Policy restricting or resisting changes of use of existing residential accommodation to student housing.
- Part (e) of the Policy is overly restrictive. A reference to replacement bed spaces rather than residential floor space would allow change of use to a mixed use. It is also not clear from the Policy what the alternative would be to replacement provision on site.
- The Policy should make it clear that the conversion of properties to student accommodation conforms to this Policy.

Inspector's Reasoning and Conclusions

5.10.1. The overall thrust of policies of the Plan is to prevent the loss of housing to other uses, and to seek to bring back into housing use dwellings lost to residential use in the past. In the majority of cases it is not possible to control the identity of the occupiers of residential accommodation, and generally a change in the nature of the occupiers would not require planning permission. Nothing in the Policy as drafted would prevent the conversion of existing residential properties to student accommodation. Furthermore, for the above reasons it would not be practical to introduce a policy restricting the change of use of existing residential accommodation to student housing, even if such a policy were desirable.

5.10.2. The principle of resisting the loss of housing is worthy of support, given the pressures and the identified need for additional housing within the Plan area. The requirement that any lost accommodation is replaced by an equivalent amount in residential floor space is clear and is less likely to lead to disagreements and difficulties in implementation than the use of a replacement bed space measure. The use of bed spaces as a measure of replacement could also lead to an overall reduction in residential floor space, if the new bedrooms were smaller than the originals. The advantages of a clear policy in my view outweigh any reduction in the ability of developers to convert to mixed use development, although there need be no loss of flexibility where the redevelopment would result in an overall increase in the amount of floor space on the site. The starting point in the Policy is that replacement provision will be made on site. There is no need for any further detail as to what the alternative might be, as this would be a matter for discussion at the development control stage.

5.10.3. A minor change of wording has been made to the original Policy 4/4 to improve its readability, addressing part of the objection by Cambridge Preservation Society.

RECOMMENDATION

5.10.4. I recommend no modification to the RDD.

5.11 POLICY 4/5 FIRST PARAGRAPH (FDD) AND POLICY 5/5 (RDD)

Objections

The objections to this aspect of the Plan are listed in Annex 3.

Summary of Objections

- There is insufficient evidence to support the Policy.
- The Policy does not have regard to current government advice in a number of respects, including that of site size threshold.
- Objections are made to the 50% figure in the Policy.
- There are objections concerning the types of affordable housing to be provided and the definition of affordability.
- The viability of what is sought under the Policy is questioned.
- Objections are made to the key worker element of the Policy.
- There are objections to the detail of the Policy.

Inspector's Reasoning and Conclusions

The need for affordable housing in the Plan area

5.11.1. According to the report of the EIP panel on objections to the Structure Plan all participants at the EIP accepted that there was a severe shortage of affordable housing, particularly in the Cambridge Sub-Region. The Panel considered the scale of identified need to be a matter of strategic significance which should be addressed in the Structure Plan. It also considered a target of 30% or more to be fully justified, although in the absence of a firm basis on which to amend the 30% target it recommended that the figure of 30%, which appeared in the draft Structure Plan, should be reviewed in the light of the publication of the outcome of a Sub-Regional housing needs survey. In the event, the adopted Structure Plan included a target for affordable housing for the Cambridge Sub-Region of 40% or more of the new housing in the Sub-Region. Although the Structure Plan was adopted before publication of the Cambridge Sub-Region Housing Needs Survey 2003, that report did contain a recommendation for a Sub-Regional target of 40%, which it noted would still require targets to be set at local level by each Council "to address the specific scale of local need and supply".

5.11.2. The evidence on which the Council relies for Policy 5/5 also includes the Cambridge City Council 2002 Housing Needs Survey (CD5.2.2). This survey indicates an annual need for 734 affordable homes to clear the existing backlog of need and to meet newly arising need, which is almost identical to the target building rate of 735 dwellings a year set in the Structure Plan. The Sub-Regional HNS identifies a higher annual shortfall for Cambridge of 969 if the backlog is to be cleared and newly arising need addressed over 5 years.

5.11.3. A number of detailed criticisms have been made of these surveys, but there has been no serious dispute that there is a high level of need for affordable housing in the area. In addition, no evidence to contradict the findings of these published surveys or to support a lower level of need than they have identified has been produced to the Inquiry. Even if some of the criticisms were justified, the level of need identified is far higher than the level of affordable housing that could be provided under Policy 5/5 as drafted. It therefore seems highly unlikely that a reworking of the surveys taking account of those criticisms would reduce the level of need below what could be provided under the Policy. Overall the evidence all points in the same direction. None of the information before the Inquiry leads me

to disagree with the assessment that there is a severe shortage of affordable housing in the area, and I also conclude on the available evidence that on the basis of need alone, a target of 50% would be justified.

The threshold site size to be included in the Policy

5.11.4. Circular 6/98 advises that a lower site size threshold than 25 houses or residential sites of 1 hectare may be adopted where exceptional local constraints can be demonstrated. Policy 10 of RPG 6 requires development Plans in the Cambridge Sub-Region to consider whether there is evidence to justify the lowering of the site threshold. The EIP Panel Report indicated their satisfaction that the scale and severity of need for affordable housing fully justified the adoption of the lower threshold in the Sub-Region, and there is no evidence to suggest that the situation has improved since then. I also note that the threshold in the adopted Local Plan is 0.5 hectares or 20 dwellings, but the need for affordable housing in the Plan area appears to have worsened since the adoption of that Plan, notwithstanding the application of that Policy.

5.11.5. In view of the significant need for affordable housing in the Plan area, and bearing in mind that, even as drafted, the RDD will not result in the need being met, it is important to maximise all reasonable opportunities to provide affordable housing. The adoption of the lower threshold identified in Circular 6/98 would assist in this. I conclude, therefore, that the exceptional circumstances required by the Circular do exist here. I also note that this lower threshold would be in line with the indicative national minimum threshold of 15 dwellings that appears in Draft PPS3.

5.11.6. One objector suggested that the Policy should apply only to sites above the threshold that were in one ownership, but such a provision might lead to developers seeking to avoid making provision for affordable housing by artificially subdividing sites. In the circumstances pertaining in this Plan area this would not be desirable, and I do not support this change.

The target figure to be included in the Policy

5.11.7. As a preliminary matter, some objectors suggested that it was inappropriate to have a target percentage figure applying across the whole of the Plan area. However, although Circular 6/98 requires the Plan to indicate how many affordable homes need to be provided across the Plan area and set indicative targets for specific suitable sites, it is not uncommon for Local Plans to adopt the approach followed here. Cambridge is a single compact settlement, and in these circumstances it is appropriate to assess need for affordable housing on a district-wide basis. Whilst it might be preferable to set targets for individual sites, there is no evidence available to the Inquiry which would allow that to be done, particularly in the case of the Areas of Major Change, and delaying adoption of the Plan to allow such information to be obtained is not a practical option. The absence of such information should not prevent the Plan from giving guidance on the amount that the Council would be seeking as a starting point, and the individual circumstances of each site, as well as matters such as the availability of public subsidy, can be taken into account in negotiations. That approach does not conflict in principle with the advice in the Circular.

5.11.8. CD5.2.2 identifies a need for affordable housing that would, it argues, justify a target of "up to at least 80%". Its recommendation of a target of 50% appears to be derived from what is described as "custom and practice" which "indicates target levels that are around 40% and rising" (paragraph 13.4), although there is no other information to explain why 50% has been chosen. Information provided to the Inquiry indicated that a 50% target had been included

in adopted Plans by Spelthorne Borough Council, and by Harrogate Borough Council in respect of specified allocated sites. Luton Borough Council and Oxford City Council were both about to adopt Plans including a 50% target following receipt of the Inspectors' reports. Other local authorities had included a target of 50% in their draft Plans, but these had not yet proceeded to adoption. Whilst the examples produced show that there has been a move in a small number of cases towards adopting an affordable housing target of 50%, they do not show a widespread "custom and practice" of adopting such a target.

5.11.9. In my view, in setting a target for affordable housing it is not enough to consider the identified need. It is also necessary to take into account local circumstances, and for this reason the targets adopted by other authorities are not entirely helpful in determining what target should be adopted in Cambridge. It is not clear that the circumstances of these other local authority areas are similar to Cambridge, which is expected to play a key role in providing the growth expected in the Sustainable Communities Plan. The case of Oxford, relied on by the Council, clearly differs as that Plan does not propose major urban extensions in which housing needs could be met. In that case also, it appears from the Inspector's Report that there was evidence from the Council on housing viability to inform that inquiry.

5.11.10. Here, the Council has not provided any evidence to show that a target of 50% across the Plan area would be realistic or achievable. There was also an absence of detailed evidence from many objectors to support their assertions that the 50% target would be unviable. However, evidence produced on behalf of Cambridge University indicated that, in the particular circumstances of the University's land between Madingley Road and Huntingdon Road, a requirement for 50% of affordable housing on the basis of the quantum of development proposed in the RDD could generate a deficit. I treat these figures with some caution insofar as they might offer any lessons for development elsewhere in the Plan area. They relate specifically to the University's own proposals for the mixed development of that site and adjoining land in South Cambridgeshire District and are based on various assumptions that will not necessarily be relevant on other sites. I say more about that evidence in Chapter 9 of this Report. But in the absence of any other evidence as to viability it raises strong doubts in my mind as to the soundness of the 50% target.

5.11.11. The Council has indicated that the target is "aspirational". However, any figure set down in the Policy will be the starting point for negotiations, and I see little point in including a figure, however aspirational, if there may be little chance of it being achieved. Given the importance of Cambridge as a key location for growth, a careful balance has to be achieved between making provision for affordable housing and providing the environment in which the required growth levels are likely to come forward. It is particularly important in the special circumstances pertaining in Cambridge that the Plan should not hamper development by setting an unreasonably high target. Otherwise that might, during periods of market weakness, encourage developers to delay bringing sites forward until market conditions were considered to be favourable enough to allow the target to be met. On the basis of the evidence presently available, I am not satisfied that setting a starting point of 50% throughout the Plan area is realistic. I do, however, accept the possibility that it would be achievable on some sites, and the Policy should allow for that possibility to be realised, bearing in mind that there is no evidence available at this stage that would allow targets to be set on a site by site basis.

5.11.12. Some objectors argued for a figure of 30%, but if only 30% were to be achieved across the Plan area, there would be a significant shortfall as set

against the Structure Plan aspiration of 40% or more. I also find some force in the Council's argument that, if the Structure Plan aim of 40% or more for the Sub-Region is to be achieved then Cambridge, as a key location for new development, is likely to have to contribute a greater proportion. Some objectors also argued for a two-tier target of 30% for Areas of Major Change (excluding the land between Madingley Road and Huntingdon Road, which I examine in more detail in Chapter 9 of this Report) and 50% for the remainder. But what evidence is available is far from conclusive as to whether 40% would be unrealistic in the Areas of Major Change, and there is no evidence that 50% would be realistic for the remainder. There is also no convincing evidence that the costs of developing the Areas of Major Change will inevitably be higher than the costs of developing other sites. In addition, I consider that the target needs to reflect the scale of need even if it may not aspire to meet it in full. For these reasons I consider that the Policy should, instead of referring to 50%, refer to "40% or more", in line with the Structure Plan.

5.11.13. I do not support the inclusion of the words "up to" before the target figure, because this would be too imprecise, suggesting that any figure below 40% might be acceptable, however low. It would also imply that developers would not be required to provide more than 40%, even if a greater amount of affordable housing proved to be viable, and that would not be consistent with the Structure Plan. There are uncertainties involved in making an assessment of viability at this stage, before the Council has been able to finalise its "toolkit" for assessing the viability of development. National and strategic policy advice, including draft PPS3, places considerable importance on increasing the amount of affordable housing. The Policy therefore needs to be flexible enough to allow a higher figure to be sought if appropriate.

5.11.14. Concerns were expressed by a number of objectors that a proportion of affordable housing as high as 50% or even lower would fail to result in a successfully socially balanced community. The publication "Challenging Perceptions", relied on by several objectors in this regard, examined three "dispersed tenure" developments and one mixed but not dispersed tenure development. Its conclusion was that "about thirty percent is likely to be the maximum level at which affordable housing can be successfully integrated into most large scale dispersed tenure developments and that figure should include an amount of equity share of some kind". Given the small size of the research sample, I am not satisfied that this conclusion is a sufficiently sound basis for restricting the proportion of affordable housing sought.

5.11.15. Cambridgeshire Horizons has commissioned its own report into the development of balanced communities, and it is clear from the Council's evidence to the inquiry that it is giving serious consideration to the creation of mixed and balanced communities and that its own policy and practice in this area is still developing. In the case of Cambridge, it is also relevant that a proportion of the affordable housing requirement is likely to be in the form of key worker housing, which will add to the available mix. The information currently available does not indicate decisively whether a 40% or more affordable housing contribution would result in an unsuccessful development. But in any event Policy 5/5 indicates that account will be taken of whether other planning objectives need to be given priority in determining the amount of affordable housing on any site, and this would enable the need to create a mixed and balanced community to be taken into account on a site by site basis, in the light of circumstances at that time.

The type of affordable housing to be provided and the definition of affordability

5.11.16. Some objectors have proposed that the Policy should also indicate the proportions of social rented and intermediate housing that should be provided, an

approach in line with emerging advice in draft PPS3. However, there is insufficient evidence before the inquiry to support the 50/50 split proposed in these objections. The Council has not sought to carry into the RDD the conclusions of CD5.2.2 that only social rented housing can meet housing need. The types of affordable housing that can be provided may well depend on the availability of public finance, the evidence on which is unclear and which is in any event a matter that is likely to change over the Plan period. Different splits may also be appropriate on different sites, depending on their particular circumstances, and at different times during the Plan period. The type of affordable housing to be provided would be a matter for negotiation between the Council and the developer at the planning application stage. To specify in the Plan what types of housing would be sought would result in an inflexible approach that would prevent changing circumstances and changing needs in the future from being taken into account in negotiations. Given the available evidence, there is no firm basis for any change to the Policy in this regard.

5.11.17. The Plan does not express a preference for any particular form of tenure, and I support that approach because it accords with current national advice. The EIP Panel report noted that in Cambridge even the lowest cost housing for sale on the open market is out of reach of many low paid workers, and recommended that the Structure Plan should define affordable housing as "discounted low cost market housing". The RDD definition is consistent with this approach, and I support it because there is no point in including within the definition of "affordable housing" something which patently is not affordable, as this would undermine the whole purpose of the Policy. It is also consistent with the emerging advice in draft PPS 3, which makes it clear that the government does not consider low-cost market housing to be affordable. Because the RDD defines what it considers to be affordable by reference to the relationship between local incomes and rents as required by Circular 6/98, I also find no conflict with the advice in that Circular.

5.11.18. Circular 6/98 requires the Plan to contain a definition of what the Council considers to be affordable. The definition in the Plan broadly accords with the definition in "Local Housing Needs Assessment: A Guide to Good Practice" (CD1.46), which recommends using 25 - 30% of net income as a measure of affordable rent, and it is also the definition used in CD5.2.2. Whilst CD1.46 notes that a higher ratio *may* be appropriate for home ownership options, there is no evidence that a higher ratio *would* be appropriate in Cambridge. The use of median incomes is justified by the Council because it better represents the salaries of middle earners, in an area where income distribution is skewed due to the local concentration of high earners. There is no convincing evidence that the Council's approach is unreasonable, and it represents a flexible response to the particular circumstances of the area whilst also reflecting national advice.

5.11.19. There is no evidence that paragraph 5.9 of the RDD would prevent new types of affordable housing coming forward. Although an objection has been made to the reference to Housing Corporation-controlled rent levels, and to Registered Social Landlords (RSLs), these do not appear to me to be inappropriate in the context in which they appear, and the definition of social rented housing is not confined to housing provided by RSLs.

Viability

5.11.20. The Council has acknowledged that viability will be taken into account in determining the numbers of affordable units to be provided on any site, and it has commissioned the development of a financial appraisal toolkit for use in assessing site viability in the Sub-Region. The Policy makes specific reference to

particular costs associated with the development and whether there are other planning objectives that need to be given priority. In my view this wording is sufficiently flexible to allow site remediation and infrastructure provision, the costs of which will vary from site to site, to be taken into account, as well as other planning objectives identified in national, strategic and local policy documents from time to time. I am not satisfied that any of the changes of wording proposed in this regard by various objectors would improve the Policy. However, the clarity of the Policy would be improved by an explicit reference to viability, and I recommend an appropriate modification.

5.11.21. The Policy requires developments to provide "an agreed mix of affordable housing types" and it provides for its target amount of affordable housing to be "sought". The Council was clear in its submissions to the inquiry that the final amount of affordable housing on any given site would be a matter for negotiation with developers, but I share the concerns of some objectors that the wording of the Policy is not entirely clear in that respect. I therefore recommend that the Policy should contain a reference to negotiation.

5.11.22. The objection by the Marshall Group concerning the effect of relocation costs in the case of East Cambridge has been met by FPC39, which adds material to Plan paragraph 9.19. Viability may well be an especially important consideration in this area.

Key Workers

5.11.23. Footnote 3 to the Policy makes it clear that affordable housing includes key worker housing. I deal with objections to the definition of key workers in the Glossary Chapter of this Report.

5.11.24. The evidence demonstrates a clear need for key worker housing, much of it for staff at Addenbrooke's, and that need is reflected adequately in paragraph 5.8 of the explanatory text. I deal with objections to the detailed wording of paragraph 5.10 below (see section 5.14). But in general terms, I support the requirement for key worker housing to be located within 30 minutes' travel time of the place of work. This would permit key worker housing for Addenbrooke's to be located in various places around the City, and not be concentrated in the southern part of the Plan area, which could lead to an undesirable lack of balance in housing types. As indicated above, I support a reduction in the 50% figure in the Policy, but given the scale of the need for affordable housing generally I do not support an increase in the proportion of key worker housing that may be provided, because that would lead to precedence being given to key workers over the needs of other groups, particularly those most in need of social rented housing.

Other matters

5.11.25. CD5.2.2 took account of affordable housing likely to be provided from sources other than residential developments, in making its assessment of housing need. There is therefore no justification for taking it into account again, in calculating what is sought from developers.

5.11.26. The Plan requires affordable housing to be made available over the long term. This approach is not inconsistent with advice in Circular 6/98 or with emerging advice in draft PPS 3. The evidence does not persuade me that there is a good reason in Cambridge to adopt a different approach to that generally advised.

5.11.27. One objector sought the exclusion from the affordable housing requirement of accommodation whose occupation is restricted. I do not support this as there would be no guarantee that any of the restricted housing would itself

be affordable.

5.11.28. Criticisms have been made of the Council's proposed use of SPD, but those documents are not before me. It is for the Council to decide whether SPD is required, and I agree that, in the circumstances pertaining in Cambridge, matters of detail, such as the use of "cascade" or fallback mechanisms where there is some doubt as to the extent of available public subsidy, would be more appropriately dealt with in SPD than in the Plan itself. Furthermore, national policy guidance on affordable housing is likely to change, and the availability of public subsidy also varies from time to time. SPD represents a more flexible means of responding to changing circumstances, and its use is supported by PPS12. The Council is clearly aware of the advice in PPS12 concerning the contents and preparation of SPD. The weight that will be attached to the contents of SPD will depend on the extent to which it complies, and is prepared in accordance, with national policy advice.

5.11.29. There is no evidence that the off-river mooring proposed in one objection would be sufficiently financially viable to generate any affordable housing. Any specific proposal would have to be considered under other policies of the Plan, and it would not be appropriate to suggest any general support for such a proposal here.

5.11.30. One objection sought a change to the second sentence of the Policy from "account will be taken.." to "account must be taken". This would make no significant change to the Policy and is therefore unnecessary.

5.11.31. I deal with Policy 5/6 below.

RECOMMENDATION

5.11.31. I recommend that the RDD be modified as follows:

Delete the second sentence of Policy 5/5 and replace it with:

"The Council will seek as affordable housing 40% or more of the dwellings or an equivalent site area. The precise amount of such housing to be provided on each site will be negotiated taking into account the viability of the development, any particular costs associated with the development and whether there are other planning objectives which need to be given priority."

5.12 PARAGRAPH 5.8

Objections

Berkeley Partnership Homes
GO-East
Conservators of the River Cam
Trumpington Meadows Land Company

339/2/DEP02/05_08
383/13/DEP02/05_08
755/9/DEP02/05_08
798/12/DEP02/05_08

Summary of Objections

- The amount of affordable housing sought will come from all sources, and not just through the mechanism of section 106 agreements linked to private housebuilding.
- Concerns over the viability and realism of this Policy remain.
- Off-river mooring in Cambridge would assist in providing affordable housing.

- Paragraph 5.8 should be updated to refer to the adopted Structure Plan.

Inspector's Reasoning and Conclusions

5.12.1. I deal with the majority of these objections above when considering Policy 5/5. Paragraph 5.8 should, however, be modified to reflect my recommendation concerning the target for affordable housing to be inserted into the Policy. In this context, it would add to the clarity of the Plan to include a reference to the Structure Plan requirements.

RECOMMENDATION

5.12.2. I recommend that the RDD be modified as follows:

Insert the following sentence at the end of paragraph 5.8:

A target of "40% or more", which would reflect the requirements of the Structure Plan, is considered to be a more realistic and achievable target to include in the Policy than that recommended in the Housing Needs Survey.

5.13 PARAGRAPH 4.8 (FDD) AND PARAGRAPH 5.9 (RDD)

Objections

The Marshall Group of Companies	66/7/DEP01/04_08
Addenbrooke's NHS Trust	399/7/DEP01/04_08
Laing Homes Ltd	708/22/DEP01/04_08
Wrenbridge Land Ltd	709/22/DEP01/04_08
Taylor Woodrow Developments Limited	710/22/DEP01/04_08
Cambridgeshire County Council	55/2/DEP02/05_09
The House Builders Federation	362/4/DEP02/05_09
GO-East	383/14/DEP02/05_09
Trumpington Meadows Land Company	798/13/DEP02/05_09

Summary of Objections

- It is important to provide a range of affordable housing types. The Plan should specify the amount of social rented housing to be provided.
- The second sentence of 4.8 should have added: "and key worker housing".
- Affordable housing should not be required when it is unviable.
- Objection is made to the definition of affordability and the requirement for affordable housing to be made available over the long term.
- Different mixes of house types and tenures will have impacts on viability and deliverability.
- Student hostels and halls of residence should be included within the definition of affordable housing.

Inspector's Reasoning and Conclusions

5.13.1. The Plan does not restrict the definition of affordable housing to "social rented housing", notwithstanding the comments in CD5.2.2. It does, however, require an agreed mix of affordable housing types to be provided. There is insufficient evidence to allow the Plan to specify what proportion of that housing should be social rented housing. That is a matter to be determined at the planning application stage.

5.13.2. The Plan makes it clear that affordable housing includes key worker housing. A further reference to such housing in paragraph 5.9 is unnecessary.

5.13.3. The Policy as I recommend it to be modified will also make it clear that viability is an issue to be taken into account when determining the affordable housing contribution to be made by any particular development. There is no need for a further reference to the matter in this paragraph.

5.13.4. Information is not available at this stage as to how different assumptions about the mix of affordable housing types and tenures, and their funding, would affect viability and deliverability. These are issues that will have to be taken into account when negotiating site specific affordable housing contributions, but in the absence of the relevant information it would not be appropriate to make any general reference to these matters in this part of the Plan.

5.13.5. CD5.2.2 did not, in reaching its assessment of housing need within the Plan area, take account of the needs of students, and Policy 5/5 does not, therefore, address their needs. The accommodation needs of Cambridge University students are met largely through the Colleges, and student accommodation for Anglia Ruskin University is provided for in Chapter 7. Under these circumstances it is neither necessary nor desirable for the definition of affordable housing to be extended to include student accommodation.

5.13.6. I deal with the Plan definition of affordability in paragraph 5.11.16 et seq, and the requirement for affordable housing to be made available in the long term in paragraph 5.11.26.

RECOMMENDATION

5.13.7. I recommend no modification to the RDD.

5.14 PARAGRAPH 5.10

Objections

Cambridgeshire County Council	55/3/DEP02/05_10
The Marshall Group of Companies	66/1/DEP02/05_10
Countryside Properties	68/6/DEP02/05_10
The Bell Educational Trust	83/7/DEP02/05_10
The House Builders Federation	362/5/DEP02/05_10
Resources Directorate Cambridgeshire County Council	379/1/DEP02/05_10
Addenbrooke's NHS Trust	399/7/DEP02/05_10
South Cambridgeshire District Council	461/7/DEP02/05_10
Patrick Schicker	735/1/DEP02/05_10

Summary of Objections

- There should be no upper limit on the level of key worker housing on individual sites. This requirement contradicts Policy 9/7.
- The definition of key workers should include references to appropriate sections of the private sector.
- The Plan should permit proximity to established major employment sites to support a higher than normal percentage of key worker housing.
- The location of key worker housing should be within a 30 minute *journey* time of place of employment, and not a 30 minute *drive* time. It should also be close to public transport nodes.

- The proposed register is overly bureaucratic; key workers simply need to fall within the glossary definition.

Inspector's Reasoning and Conclusions

5.14.1. Given the scale of the need for affordable housing generally in the area I do not support an increase in the proportion of key worker housing that would normally be provided, because that would lead to precedence being given to key workers over the needs of other groups, particularly those most in need of social rented housing. However, as paragraph 5.10 is presently worded the proportion of key worker housing to be provided could be increased in appropriate cases. The Council will wish to consider whether that might be appropriate in the vicinity of Addenbrooke's, but I do not support a specific reference to that possibility in the Plan because the need to achieve a successful and balanced development also needs to be taken into account. The Area of Major Change referred to in Policy 9/7 has been released from the Green Belt specifically to allow the needs of Cambridge University to be met, and for that reason a different approach to requirements for key worker housing on that site is warranted.

5.14.2. Whilst key workers are normally public sector employees, the definition in the Glossary does not confine them to the public sector. I say more about the Glossary definition in Chapter 13. There is sufficient flexibility in the Plan to allow key worker housing to be extended to private sector employees in appropriate circumstances. It is important that there is a mechanism for determining who might be eligible for key worker housing, to ensure that subsidised housing is used for the intended purpose in the long term, and for that reason I do not support any change to the proposed register mechanism.

5.14.3. The locational criteria for key worker housing requires it to be within a 30 minutes drive time of the place of work. Some objectors sought a reference instead to a 30 minute travel time. It is not clear what difference such a change would make in practice, given the compact nature of the Plan area. But the current wording of the Plan has some support from the findings of the Cambridge Sub-Region Key Worker Housing Research Final Report relating to existing journey to work time. There is insufficient evidence at this stage to support a change to the wording of the Plan in this respect, although the Council will wish to keep the situation under review to ensure that the distance requirement does not prove an obstacle to the provision of adequate key worker housing. In terms of proximity to public transport nodes, key worker housing should be no different from other forms of new housing, all of which needs to be located so as to offer a choice of modes of transport.

RECOMMENDATION

5.15.4. I recommend no modification to the RDD.

5.15 PARAGRAPH 4.12 (FDD)

Objections

The House Builders Federation

362/35/DEP01/04_12

Summary of Objections

- The 50% affordable housing requirement is unjustified and the site size threshold is too low.

Inspector's Reasoning and Conclusions

5.15.1. Paragraph 4.12 has been deleted and does not appear in the RDD. I deal with the substance of these objections in section 5.11.

RECOMMENDATION

5.15.2. I recommend no modification to the RDD.

5.16 PARAGRAPH 4.13 (FDD) AND PARAGRAPH 5.12 (RDD)**Objections**

The Bell Educational Trust

83/5/DEP01/04_13

The House Builders Federation

83/8/DEP02/05_12

362/6/DEP02/05_12

Summary of Objections

- Objection is made to the use of Supplementary Planning Guidance.
- Is this SPD programmed in the Council's LDS?

Inspector's Reasoning and Conclusions

5.16.1. I deal with the substance of these objections elsewhere. SPD on affordable housing is programmed in the Council's LDS.

RECOMMENDATION

5.16.2. I recommend no modification to the RDD.

5.17 PART OF POLICY 4/5 (FDD) AND POLICY 5/6 (RDD)**Objections**

The objections to this aspect of the Plan are listed in Annex 3.

Summary of Objections

- The Policy is unreasonable and not supported by national policy advice.
- No further provision of affordable housing is required as the target in Policy 5/5 already reflects forecast housing need.
- The Policy will be difficult to enforce because of difficulty in measuring impact.
- The requirement could prejudice economic growth.
- Contributions should only be required when they meet the tests in Circular 1/97.
- The Policy should not apply to Areas of Major Change as they will already be providing affordable housing.
- The Policy should not apply to small sites or to redevelopment of existing employment sites. There is no rationale for the floorspace threshold.
- The Policy should not apply to developments funded within the public sector or University-associated research establishments and institutions.

- The word "new" should be added at the beginning of the Policy.

Inspector's Reasoning and Conclusions

The principle of the Policy

5.17.1. Policy P9/8 of the Structure Plan requires all development likely to have a definable impact on infrastructure requirements to make provision for infrastructure accommodating local impacts. The list of infrastructure included in the Policy includes affordable and key worker housing. Policy P9/1, dealing with housing distribution in the Cambridge Sub-Region, provides that employment developments will be expected to contribute towards affordable housing through developer contributions, in accordance with Policy P9/8. Some objectors argue that the Structure Plan requirement is limited to cluster developments, but although Policy P2/4 dealing with clusters does include a requirement for cluster businesses to contribute towards affordable housing, Policy P9/8 is clearly worded to apply to *all* employment developments. Policy 5/6 is consistent with the Structure Plan requirements, as well as with the expectation in paragraph 5.114 of the Draft East of England Plan.

5.17.2. The EIP Panel report noted that there was nothing in Circular 6/98 which specifically advocates a contribution to affordable housing from employment developments, but nothing which precludes it either. In the Panel's view such a requirement would comply with the five tests in paragraph 7 of Circular 1/97, a view that I share. These tests now appear, substantially unaltered, in Circular 5/2005. That Circular gives the specific example, in paragraphs B12 et seq. of Annex B, of a planning obligation that could be used to secure an element of affordable housing in a residential or mixed-use development. But nothing in that Circular rules out the securing of affordable housing from an employment development, and indeed paragraph B11 points out that the examples given are not exhaustive. I find no conflict between the advice in the Circular and the principle of Policy 5/6.

5.17.3. Although Policy 5/5 requires residential development to make provision for affordable housing, it is clear from the various surveys before the Inquiry that identified need will not be satisfied in full through that Policy, and that there will still be unfulfilled need for affordable housing. The Policy specifically applies only to employment developments likely to have an impact on demand for affordable housing, and requires mitigation of such impacts. In situations where there was no such impact, therefore, no contribution would be required. There is a lack of detail as to how the Policy would operate in practice, and particularly as to how an impact would be measured. This could present particular problems in the case of speculative development. However, the Council proposes to elaborate on the operation of the Policy in SPD, and I am not satisfied on the available information that these problems are incapable of resolution.

5.17.4. Some criticism has again been made of the Council's proposed use of SPD. But PPS12 is supportive of its use provided it is consistent with national and regional planning policies and is prepared in accordance with advice. That includes a requirement for rigorous procedures of community involvement. What is proposed by the Council is not in conflict with that advice.

Viability issues

5.17.5. Some objectors have expressed concern that the Policy runs counter to the Structure Plan strategy for economic growth. But that was clearly not a concern of the EIP Panel in considering Structure Plan policy. However, the Council will need to monitor the operation of the Policy closely, as well as the bringing forward of

employment land allocations in the Plan, and take corrective action if it appears that the Policy is having a harmful effect on growth. It is possible that the requirement would have a positive effect on the recruitment and retention of staff, and would thus improve the attractiveness of Cambridge as a location for employment. But it would clearly undermine the objectives of the Plan, and those of the Government's Sustainable Communities strategy, for the requirements of this Policy to prevent otherwise desirable development from coming forward.

5.17.6. Circular 5/2005, to which the Council will have to have regard when considering employment development proposals, requires planning obligations to be fairly and reasonably related in scale and kind to the proposed development. It also advises in paragraph B10 that when issues of viability arise, decisions on the level of contribution should be based on negotiation over the level that might be reasonable whilst still allowing development to take place. I do not, however, support the inclusion of the Circular 5/2005 tests in the Plan itself, as this would add nothing of value.

Relationship with Policy 5/5

5.17.7. It is not completely clear from the Plan itself how Policy 5/6 would relate to the requirements of Policy 5/5 in mixed development areas, including the Areas of Major Change. It seems to me that there is a fundamental difference between the two policies, in that Policy 5/6 relates to the mitigation of a harmful impact, whereas Policy 5/5 addresses the national planning policy that residential development should include a proportion of affordable dwellings. There is, therefore, no reason in principle why both parts of a mixed employment and residential development should not be required to contribute an element of affordable housing.

5.17.8. The Council has indicated that where the affordable element of the residential part of a scheme is intended to meet the affordable housing needs of the employment part of the development, that would satisfy the requirements of Policy 5/6. In measuring the impact of an employment development on the need for affordable housing in the area, it would also be necessary to take into account any provision being made by the employer. It seems to me that a more complex relationship between employment and housing development may emerge in some of the Areas of Major Change than is envisaged in the second paragraph of the Policy. But this is a matter that would be better dealt with in SPD. I do not find the absence of clarity on this particular point to be fatal to the principle of the Policy, and the use of SPD to expand on the operation of the Policy would not conflict with the advice in PPS 12.

Application to existing businesses and small sites

5.17.9. The Structure Plan requirement is clearly intended to apply to existing businesses as well as those that are established or expanded in the area. The key question, in determining whether the Policy should apply, is whether an employment development will have an impact on the demand for affordable housing in Cambridge or the Sub-Region, not whether it is new to the area or already based there. If there is an impact, then in principle the development should be required to mitigate that impact. For the same reason there is no justification in principle for applying a threshold for new development below which the Policy should not apply, and I support the removal from the FDD Policy 4/5 of such a threshold.

Should the Policy apply to public sector developments?

5.17.10. There is nothing in either the Structure Plan or the emerging RSS that suggests that community infrastructure providers or University-related

development should be exempted from the requirement for employment development to contribute towards affordable housing. The EIP panel acknowledged in their report that both the University of Cambridge and Addenbrooke's Hospital were proposing to meet some of their affordable/key worker housing needs from large-scale releases of land from the Green Belt, and noted that in both cases this would represent a contribution towards the overall infrastructure requirement under the terms of what is now Policy P9/8. There was no suggestion in that part of the report that either of these bodies should not be subject to the requirement. Nor do I read Policy P9/8 as excluding infrastructure developments from the requirement to address their own impacts on infrastructure.

5.17.11. The Council will need to have regard, in negotiating contributions from public bodies, to the advice in paragraph B10 of Circular 5/2005, that decisions on the level of contributions should be based on negotiation over the level of contribution that can be demonstrated is reasonable to be made whilst still allowing development to take place. But it is not necessary to repeat in the Policy this matter already set out in a national policy statement. The Council will also need to have regard to the extent to which a strict application of the Policy might result in the diverting of funds from other desirable activities, such as clinical services, or might make a desirable development unviable. But these are matters that are more appropriately addressed in SPD than in the Policy. I do not therefore support any modification to the Policy in these respects.

5.17.12. I have taken account of the comments made by the Inspector considering objections into the Oxford Local Plan. However, one of the functions of local planning policy documents is to reflect local circumstances, and it is not at all clear from the Oxford Inspector's report that the circumstances pertaining in Oxford are reflected in Cambridge's case. In particular, in Cambridge Addenbrooke's is the chief generator of key worker housing demand. Whilst it is clear from the evidence that Addenbrooke's is already addressing the need to house its own staff, I agree with the Council that it is essential that the Trust continues to do that. Similarly, Cambridge University is proposing additional developments, either directly or indirectly, and it is important that any resulting impacts on the need locally for affordable housing are capable of being addressed. Similar considerations apply to other public sector development likely to affect the need for affordable housing in the area.

5.17.13. I am not persuaded by the views of the Board of Cambridgeshire Horizons that this Policy should not in principle apply to health care services, given the potential size of the impact on affordable housing requirements arising from such developments. As that body is charged with programming and co-ordinating infrastructure delivery in the Cambridge Sub-Region, it can, if it wishes in any particular case, indicate its view that the need for the development is more important than the need for the development to mitigate its impact. That is a view that would be entirely legitimate for the Council to take in any particular case, in view of the advice in Circular 5/2005, but it does not undermine the need for the Policy to apply across the board in principle.

Other matters

5.17.14. The Policy will only apply to employment proposals that require planning permission, which are by definition new. Adding that word to the Policy is therefore unnecessary.

RECOMMENDATION

5.17.15. I recommend no modification to the RDD.

5.18 PARAGRAPH 4.9 (FDD)**Objections**

The Chancellor, Masters and Scholars of the
University of Cambridge
Countryside Properties
Addenbrooke's NHS Trust

33/13/DEP01/04_09
68/16/DEP01/04_09
399/8/DEP01/04_09

Summary of Objections

- Key worker housing developments should be exempt from further affordable housing requirements and affordable housing contributions should not be sought from University related employment development.
- The type of evidence required in this paragraph to justify key worker housing is not a land use matter.
- Housing developers, especially in South Cambridge, should be expected to provide a significant proportion of new affordable housing as key worker housing.

Inspector's Reasoning and Conclusions

5.18.1. This paragraph, and the reference to production of evidence to justify key worker housing, have not been carried forward into the RDD.

5.18.2. Key worker housing as defined is a subset of affordable housing, and in the case of the development of key worker housing the Plan would not require additional affordable housing.

5.18.3. I deal with the question of affordable housing contributions from employment development in section 5.17, and I deal with the question of key worker housing in South Cambridge in paragraph 5.11.24.

RECOMMENDATION

5.18.4. I recommend no modification to the RDD.

5.19 PARAGRAPH 4.10 (FDD)**Objections**

Countryside Properties
Addenbrooke's NHS Trust
The Anglia Support Partnership
Cambridgeshire & Peterborough Mental
Healthcare Partnership
Cambridge City Primary Care NHS Trust

68/17/DEP01/04_10
399/10/DEP01/04_10
704/2/DEP01/04_10
705/2/DEP01/04_10
706/2/DEP01/04_10

Summary of Objections

- Employers cannot be required to reserve any of their land for housing, and what is proposed would be very difficult to implement in practice.
- Promoters of clinical developments and related R&D developments should be excluded.

- NHS trusts in Cambridge should not be required to accommodate their own staff on surplus land rather than disposing of it on the open market to finance improvements.

Inspector's Reasoning and Conclusions

5.19.1. Although paragraph 4.10 of the FDD has been deleted, the same words appear in paragraph 5.13 of the RDD. In my view, to set out a blanket requirement that any land owned locally by employers, regardless of its location, should be developed for housing for their own workers before such provision can be made elsewhere, is unreasonable. There might be circumstances not envisaged at this stage, other than those allowed for in what is now paragraph 5.13, which would justify off-site housing provision. I therefore recommend that the sentence be deleted.

RECOMMENDATION

- 5.19.2. I recommend that the RDD be modified as follows:**
In paragraph 5.13 delete the whole of the third sentence.

5.20 POLICY 4/7 (FDD), POLICY 5/8 AND PARAGRAPH 5.15 (RDD)

Objections

Cambridge Preservation Society
GO-East
Peter Convey

26/23/DEP01/04_P07
383/10/DEP02/05
766/10/DEP02/05_P08
766/16/DEP02/05_15

Summary of Objections

- Some changes of wording are sought. It is not clear what an "emergency" stopping site is.
- An assessment of travellers' housing needs is required as a basis for deciding whether a policy relating to gypsy/travellers' site provision is needed.
- Travellers' sites within the City lead to loss of amenity and quality of life for residents and river users. The lost amenity and space should be returned to the community.

Inspector's Reasoning and Conclusions

5.20.1. The wording change proposed in objection 26/23/DEP01/04_P07 has been incorporated into RDD Policy 5/8.

5.20.2. There is some force in the argument that it is not clear what an "emergency" might be, but as the intention of the Policy seems to be directed at temporary stops, it would be clearer if both the Policy and the explanatory paragraph made reference instead to a "temporary stopping place".

5.20.3. There is no evidence before the Inquiry as to whether there is any need for the provision of additional gypsy sites within the Plan area. It is not, therefore, clear whether the Council has taken into consideration the needs of gypsies in preparing the RDD. This is a matter that the Council will have to address in preparing its LDF, in the light of national policy advice current at that stage. However, in the absence of any evidence as to need it would not be appropriate to recommend any modification to this Plan.

5.20.4. The question of unauthorised travellers' sites is a matter of enforcement for the Council, rather than one to be addressed through policies in this Plan.

RECOMMENDATION

5.20.5. I recommend that the RDD be modified as follows:

In Policy 5/8 and paragraph 5.15 delete "emergency stopping site" and replace with "temporary stopping place".

5.21 POLICY 4/8 AND PARAGRAPHS 4.18, 4.16, 4.17 (FDD), POLICY 5/9 (RDD)

Objections

Camstead Homes	74/11/DEP01/04_P08
The House Builders Federation	362/10/DEP01/04_P08
	362/38/DEP01/04_18
	362/36/DEP01/04_16
	362/37/DEP01/04_17
Network Rail	370/8/DEP01/04_P08
James Development Co. Ltd	378/11/DEP01/04_P08
Laing Homes Ltd	708/23/DEP01/04_P08
Wrenbridge Land Ltd	709/23/DEP01/04_P08
Taylor Woodrow Developments Limited	710/23/DEP01/04_P08
The Marshall Group of Companies	66/16/DEP02/05_P09
The Bell Educational Trust	83/9/DEP02/05_P09
Addenbrooke's NHS Trust	399/8/DEP02/05_P09

Summary of Objections

- The Policy should be more flexible and provide that the amount of such housing will be negotiated taking into account practical considerations such as density, housing mix and design, site circumstances and other Plan objectives.
- The internal layout of buildings is not normally material to the consideration of planning permission, and dwelling access arrangements are a building regulation matter, which should not be duplicated in Local Plans.
- The Policy is unreasonable and should be deleted, as the purported benefits of Lifetime Homes are unproven, and it is not clear that there is a genuine demand or unmet need for such homes.
- There is no justification for the 15% threshold, which should be deleted.
- The Policy should refer to elderly people in addition to people with disabilities.

Inspector's Reasoning and Conclusions

5.21.1. PPS 1 requires development Plan policies to take account of the needs of all of the community, including particular requirements relating to age and disability. PPG 3 advises that local authorities should take account of assessments of local housing need, including the needs of the elderly and disabled, and formulate Plans which secure an appropriate mix of dwellings to meet the needs of the area. Structure Plan Policy P5/4 requires local Plans to make provision to meet the locally assessed need for housing suitable for the elderly and those with mobility problems. All of this advice and guidance supports the principle of a policy requiring a proportion of homes to be provided to be suitable for occupation by people with disabilities.

5.21.2. Generally speaking the internal layout of buildings is not normally a matter to be considered in determining planning applications, and the Policy should not either duplicate or seek to supplement the requirements of Part M of the Building Regulations in this regard. PPS 1 advises that development Plans should contain clear, comprehensive and inclusive access policies in terms of both location and external physical access. But there is nothing in that guidance, or in the ODPM publication "Planning and Access for Disabled People: a Good Practice Guide", that would support the inclusion in a local Plan of a policy dictating the internal design of buildings.

5.21.3. The reference to the Lifetime Homes Standard originally included in Policy 4/8 does not appear in Policy 5/9 of the RDD. But for the reasons set out above I am not satisfied that a reference to the standard in the explanatory text would be appropriate either, and I note in this regard the comments of the First Secretary of State in his decision dated 9th January 2003 on a planning application by Quedgeley Urban Village Ltd. However, I consider that a policy relating to external design would be reasonable in principle, bearing in mind the requirements of both national and Structure Plan policy with regard to housing for the elderly and those with mobility problems. I therefore recommend an appropriate modification to both the Policy and the supporting text.

5.21.4. Furthermore, given the findings of the Cambridge Housing Needs Survey (CD5.2.2) that around 13% of households contain people with disabilities and the frail elderly, and bearing in mind the ageing population in the area, the figure of 15% to be sought through the Policy is also not unreasonable. However, the wording of the Policy, even following the amendments made in the RDD, does not make it clear that the number of homes on any given site to be suitable for occupation by people with disabilities will be a matter for negotiation, and as this appears to be the intention of the Council the Policy should be modified in the interests of clarity. This will allow matters such as viability and site circumstances to be taken into account in applying the Policy.

5.21.5. There is no need for a specific reference in the Policy to elderly people. I agree with the Council that this would not improve the Policy, because simply being elderly does not give rise to a need for a specially designed home. Nor, for the reasons set out above, would it be appropriate to require homes to be designed to address the needs of the frail elderly.

RECOMMENDATION

5.21.5. I recommend that the RDD be modified as follows:

1. Policy 5/9 be modified to read "Housing developments of 15 or more dwellings will only be permitted if they provide housing with external design, layout and access suitable for occupation by people with disabilities. The amount of such housing sought will be 15% of the market housing and 15% of the affordable housing, subject to negotiation. The housing should be designed or capable of adaptation to meet long-term housing needs."

2. Delete paragraphs 5.17 and 5.18 and replace them with:

"Housing provided for first occupation by people with specific disabilities would satisfy the requirements of Policy 5/9".

5.22 POLICY 4/9 (FDD) AND POLICY 5/10 (RDD)

Objections

Cambridge Preservation Society	26/25/DEP01/04_P09
The Marshall Group of Companies	66/8/DEP01/04_P09
Camstead Homes	74/12/DEP01/04_P09
James Development Co. Ltd	378/12/DEP01/04_P09
GO-East	383/23/DEP01/04_P09
The Marshall Group of Companies	66/17/DEP02/05_P10
GO-East	383/7/DEP02/05_P10
Bidwells Property Consultants	396/6/DEP02/05_P10
Anne Campbell	768/3/DEP02/05_P10

Summary of Objections

- The Policy needs to define more clearly the mix of housing aimed at, as the main lack is for housing in the middle of the housing market. Provision should also be made for people who work at home.
- The scope of the Policy should be extended to encompass "dwelling sizes, types, affordability and tenures".
- The Policy should recognise that it may be impractical to provide a mix of dwelling sizes and types on developments of as few as 15 dwellings.
- It would be helpful if the Plan gave an indication of the types and sizes of new dwellings that will be sought within the context of the existing housing stock.
- There should be no lower limit for a mix of housing to be provided, and the mix of dwellings sought should be made clearer.

Inspector's Reasoning and Conclusions

5.22.1. The Council's Housing Needs Survey indicates that the vast bulk of the need for new housing is for smaller units. But the aim in PPG 3 of mixed and balanced communities would not be achieved, particularly in the urban extensions, by seeking a preponderance of one particular type of housing. In different areas of the City, depending on local characteristics, the appropriate mix that should be sought could well vary. Furthermore, over the Plan period to 2016, needs could change. There is also insufficient information before the inquiry to be certain what the appropriate mix should be. For these reasons, the Council's approach in not specifying in the Policy the precise mix to be sought is reasonable.

5.22.2. The Policy as drafted would permit larger homes suitable for those who wish to work from home to be provided, if appropriate. There is no need for a reference to affordability in this Policy, as the issue of affordable housing is dealt with in Policy 5/5. Nor is it appropriate for the Policy to express a preference for a particular form of tenure, bearing in mind the advice in Circular 6/98.

5.22.3. I share the Council's view that it could be impractical to provide a mix of dwellings on sites below the threshold specified in the Policy. However, there is no evidence that this would not be possible on sites above the threshold, bearing in mind the flexible requirements of the Policy.

RECOMMENDATION

5.22.4. I recommend no modification to the RDD.

COMMUNITY FACILITIES

5.23 POLICY 4/11 AND PARAGRAPH 4.27 (FDD); POLICY 5/11 AND PARAGRAPHS 5.21 - 5.26 (RDD)

Objections

Cambridgeshire County Council	55/6/DEP02/05_26
Dr. G. E. Rogers	55/29/DEP01/04_P11
Resources Directorate, Cambridgeshire County Council	337/17/DEP01/04_27
Bidwells Property Consultants	379/1/DEP01/04_P11
	396/4/DEP02/05_P11
	396/7/DEP02/05_22
	396/31/DEP01/04_P11
Resources Directorate, Cambridgeshire County Council	379/2/DEP02/05_26
	379/3/DEP02/05_P11
Cambridge Citizens Advice Bureau	802/1/DEP02/05_24
Cambridgeshire Fire and Rescue Service	810/1/DEP02/05_P11
	810/3/DEP02/05_21
	810/4/DEP02/05_24
	810/5/DEP02/05_25

Summary of Objections

- Changes are sought to the wording of the Policy and paragraph 5.26.
- There should be an independent assessment of local need.
- Why should this Policy apply to private sector schools and why, if the school is no longer needed, should "other community use" be the next preferred choice?
- Why should private education sites be retained even if there is no business need to keep them?
- The Plan should refer to the community importance of modern fire station facilities in the context of the site at Parkside, given that there will be a need for enabling development to finance the new fire station.
- The Citizens Advice Bureau should be added to the list of community facilities to be protected in the event of development of their premises.

Inspector's Reasoning and Conclusions

5.23.1. The words "or other community" have not been carried forward into RDD Policy 5/11. I am not satisfied that, in the context of the redevelopment of school sites, there is any need for the Policy to be further modified to make reference to the relocation of other community uses.

5.23.2. It is reasonable for the Policy to require need to be assessed in the longer term, given that the Plan makes provision for development that is likely to continue beyond the Plan's time horizon. For that reason, too, it would be inappropriate to limit "longer term" to the Plan period. Whilst the phrase "in the longer term" is somewhat imprecise, circumstances pertaining at the time of any planning application would allow an appropriate time horizon to be determined.

5.23.3. Given the extensive new development provided for in the Plan, which is likely to place additional demands upon available education facilities, the statement in paragraph 5.26 concerning schools surplus to requirements is not unreasonable, and I do not support any modification. The inclusion of this statement would not prevent the redevelopment of a school site under Policy 5/11 if the requirements of that Policy were satisfied. Nor would it prevent the numerous factors relevant to a decision on the need to retain a school from being taken into account. The explanatory paragraphs make it clear that the City Council will liaise with the County Council on the question of need for school sites, and the amendment suggested by the County Council would add nothing of substance to the text.

5.23.4. There is nothing in the Policy that would prevent the absence of business need for educational facilities from being taken into account in applying the Policy.

5.23.5. It is appropriate that paragraph 5.25 (4.27 in the FDD) should place the burden of producing adequate evidence of a lack of local need on the developers. However, any information submitted will need to be examined by the Council, who will be able to assess whether the information satisfies the requirements of the Policy in the light of its knowledge of local circumstances. It is not necessary to require in addition an assessment of local need independent of that carried out by the Council.

5.23.6. There is nothing in the Policy to suggest that it does not apply to private educational establishments, other than those specifically excluded by paragraph 5.22. The Council is justified, in my opinion, in applying the Policy to private schools because there is only a limited amount of land available for development within the Plan area, and even the closure of a private school has the potential to lead to demand for replacement school places elsewhere which could be difficult to meet. In the event that it can be demonstrated that there is no longer a need, then the Policy would permit the site to be redeveloped.

5.23.7. Paragraph 5.24 makes it clear that facilities for the emergency services are included within the remit of the Policy, and given the express allocation of the Parkside police and fire stations for redevelopment for housing and community facilities (Site 5.13 in the RDD), there is no need for any further reference to that particular site to be made in this part of the Plan.

5.23.8. The Plan lists the various uses of land that would constitute community facilities to be protected by the Policy. It is, in my view, right that the Plan should seek to protect specified uses rather than premises occupied by named bodies. I do not, therefore, support the inclusion of a reference to the Citizens Advice Bureau in the Plan, and I am not satisfied on the information before the inquiry that there is a good case for including advice points in the list of facilities to be protected.

RECOMMENDATION

5.23.9. I recommend no modification to the RDD.

5.24 POLICY 4/12 (FDD) AND POLICY 5/12, PARAGRAPHS 5.27 AND 5.28 (RDD)

Objections

Cambridge Preservation Society
Januarys
Cambridge City & South Cambridgeshire PCTs

26/27/DEP01/04_P12
691/1/DEP01/04_P12
388/4/DEP02/05_P12
388/13/DEP02/05_27
783/2/DEP02/05_P12
783/3/DEP02/05_28

Cambridge Community Church Trust

Summary of Objections

- The words "or demand" should be inserted after "need".
- There should also be a criteria based policy that deals with proposed developments as they may come forward on private or state education sites, to give comfort to education providers that developments beneficial to the product they are able to offer pupils will be favourably viewed.

- There is little mention of co-location of services and facilities. The reference to hospitals and health facilities should be changed to "facilities to provide Health and Social Care in community settings".
- It is unreasonable to apply the sequential test to charitable organisations, and either the final sentence of paragraph 5.28 should be deleted or charitable organisations should be specifically excluded.

Inspector's Reasoning and Conclusions

5.24.1. I am not satisfied that including the words "or demand" in the Policy would add anything to the Plan.

5.24.2. Any proposals for new educational developments would be subject to consideration under Policy 5/12, which relates to new community facilities including schools. That Policy, together with other policies in the Plan, provides an adequate policy framework within which such proposals could be considered, and there is no convincing need for an additional policy in this regard.

5.24.3. There is nothing in the Policy that would rule out the co-location of services and facilities, and paragraph 5.27 gives positive encouragement to shared use. This paragraph is worded in general terms, and there is no need to add to the length of the Plan by listing every type of community facility that might be required. The references in the supporting paragraphs to hospitals and other health facilities would include facilities to provide health and social care in community settings, as well as in other locations, and I see no reason to limit the wording of the text in the way suggested by the objector.

5.24.4. It is important that facilities that are likely to be well used and which serve a large catchment area are located so that they can benefit from good public transport links, to avoid unnecessary reliance on the use of the private car. There is no justification for excluding charitable groups from this requirement, which is entirely in accordance with national policy guidance on the location of significant trip-generating development.

RECOMMENDATION

5.24.5. I recommend no modification to the RDD.

5.25 PARAGRAPH 4.29 (FDD)

Objection

Bidwells Property Consultants

396/32/DEP01/04_29

Summary of Objection

- It is wholly inappropriate to use planning powers to impose public use on the operators of private facilities.

Inspector's Reasoning and Conclusions

5.25.1. The sentence objected to has not been carried forward into the RDD.

RECOMMENDATION

5.25.2. I recommend no modification to the RDD in response to this objection.

5.26 POLICY 4/13 (FDD)

Objections

Cambridge Preservation Society	26/28/DEP01/04_P13
The Marshall Group of Companies	66/11/DEP01/04_P13
Countryside Properties	68/19/DEP01/04_P13
The House Builders Federation	362/12/DEP01/04_P13
Network Rail	370/9/DEP01/04_P13
Bidwells Property Consultants	396/33/DEP01/04_P13
Addenbrooke's NHS Trust	399/11/DEP01/04_P13
Trumpington Environmental Action Group (TEAG)	460/13/DEP01/04_P13

Summary of Objections

- The final sentence of the Policy is contrary to national policy. Requirements must be reasonable, and not too costly.
- The Policy is too general and is superfluous in the light of other policies.
- New facilities should be integrated with existing communities.

Inspector's Reasoning and Conclusions

5.26.1. The final sentence of the Policy has been omitted in the RDD. Otherwise, the questions of what is needed, and of reasonableness and cost of requirements for the provision of new facilities in new developments, if needed, are to be decided in conjunction with specific proposals.

5.26.2. There are other policies in the Plan which cover the same ground as that part of Policy 4/13 surviving in the RDD, but Policy 5/13 covers additional matter and on balance I consider that the Policy should not be deleted. A general policy should not seek to enter into too much detail, but community facilities are defined in various places in Chapter 5 of the RDD. The question of provision arising from hospital and similar development is addressed under Policy 5/14 below.

5.26.3. Integration with existing communities is discussed below.

RECOMMENDATION

5.26.4. I recommend no modification to Policy 5/13 of the RDD as a result of these objections.

5.27 POLICY 5/13

Objections

Countryside Properties	68/7/DEP02/05_P13
The Bell Educational Trust	83/10/DEP02/05_P13
English Heritage	338/21/DEP02/05_P13
Cambridge City & South Cambridgeshire PCTs	388/14/DEP02/05_P13
Addenbrooke's NHS Trust	399/9/DEP02/05_P13
Trumpington Environmental Action Group (TEAG)	460/27/DEP02/05_P13
Countryside Properties/Liberty Property Trust	837/5/DEP02/05_P13

Pre-Inquiry Changes: SC5.001

Summary of Objections

- The subject of the final 2 sentences could be transferred to Chapter 9.
- The Policy discriminates against urban extensions.
- There is little coverage of health and social care facilities.
- Only the needs arising from new development should be met. New facilities should be sustainable and integrated with existing communities.

Inspector's Reasoning and Conclusions

5.27.1. Structure Plan Policy P9/8 envisages development contributing to the needs of the Sub-Region as a whole. The possibility of providing City-wide or sub-regional facilities in urban extensions properly follows on from this and from Policy 5/12. The circumstances where this might occur are explained in paragraph 5.30. The urban extensions are extensive and their development could both lead to the need for large scale facilities and present opportunities for the accommodation of such facilities. Whether there is such a need or opportunity on a particular site will be determined on the merits of the specific case, as will the mechanism for securing facilities. These matters are not yet known and so cannot easily be defined in the Plan.

5.27.2. Proposed changes rightly apply the Policy, and paragraph 5.30, to all Areas of Major Change. It is not only the urban extensions which are of a scale which could require new facilities arising from new development: the urban Areas of Major Change are large and might require new facilities.

5.27.3. Community facilities are defined in paragraphs 5.21-5.24. The Policy should not be encumbered with lists of uses which could be provided or which could generate needs. The Policy does not require the needs of existing development to be met by new development. Paragraph 5.30 explains in what circumstances provision for City-wide or sub-regional facilities might need to be made. This might happen where no site is available in the urban area. With regard to locating new facilities, the Plan's reasoned justification refers to "the sequential test".

5.27.4. TEAG does not ask for developers to be required to provide facilities to meet the needs of existing communities, but asks that new facilities provided to meet the needs arising because of new developments be located so as to assist with integration.

5.27.5. The Council proposes a change to the draft Plan (SC5.003, changing paragraph 5.31), to add location to the list of factors to be considered in determining the provision of community facilities in Areas of Major Change. In fact the Council, in its further work on these areas, has as one objective the location of such facilities so as to encourage integration. Although this is one of a number of objectives, its inclusion in the Plan would not elevate it to a position of undue prominence. Other parts of the draft Plan refer to sustainability but in my view integration of new populations with existing communities is sufficiently important in its own right to warrant a place in the Plan.

5.27.6. I consider that it should be referred to in the Plan. Wording, and the appropriate location of such wording in the Plan, were discussed at the inquiry. A modification to Policy 9/3 would be the best way of incorporating the objective of integration, and I make a recommendation to modify that Policy in the relevant part of this report.

RECOMMENDATIONS

5.27.7. I recommend that the RDD be modified by the incorporation of SC5.001 and SC5.003.

5.28 PARAGRAPH 4.30 (FDD)

Objections

Windsor Road Residents

366/21/DEP01/04_30

Summary of Objections

- There should be severe penalties for failing to provide for needs generated by new development.

Inspector's Reasoning and Conclusions

5.28.1. This matter is dealt with elsewhere in this report.

RECOMMENDATION

5.28.2. I recommend no modification to the RDD.

5.29 PARAGRAPH 5.30

Objections

Windsor Road Residents

366/57/DEP02/05

Pre-Inquiry Changes: SC5.002

Summary of Objections

- The deleted parts of paragraph 4.30 in the FDD should be restored.

Inspector's Reasoning and Conclusions

5.29.1. The Plan should not appear to require new development to make up existing deficiencies in facilities. I comment above (section 5.27) on the proposed change.

RECOMMENDATION

5.29.2. I recommend that the RDD be modified by the incorporation of SC5.002.

5.30 POLICY 4/14 (FDD)

Objections

The objections to this aspect of the Plan are listed in Annex 3.

Summary of Objections

- The Policy requires all major/residential developments to provide new facilities.

- "Major" is not properly defined.
- The footnote reference to education should be deleted.
- More detail is required on the nature of contributions and the use of negotiation to arrive at contributions.
- New facilities should be integrated with existing communities.

Inspector's Reasoning and Conclusions

5.30.1. In the RDD Policy 5/14 makes it clear that only new developments which lead to an increased demand will be expected to provide or contribute to new provision of community facilities. The footnote, and references to major development and residential development, have been deleted.

5.30.2. I deal above (section 5.27) with the question of integration of new facilities with existing communities.

5.30.3. Paragraph 5.32 and Chapter 10 of the RDD expand on the requirements for meeting needs generated by new development, and refer to the Council's Planning Obligations Strategy. There is no need in my opinion for further detail regarding the process of arriving at the contributions which will actually be required, nor to repeat criteria included in national policy.

RECOMMENDATION

5.30.4. I recommend no modification to the RDD.

5.31 POLICY 5/14

Objections

Cambridgeshire County Council	55/7/DEP02/05_P14
Addenbrooke's NHS Trust	399/10/DEP02/05_P14
Trumpington Environmental Action Group (TEAG)	460/28/DEP02/05_P14
Norfolk, Suffolk & Cambridgeshire Strategic Health Authority	787/1/DEP02/05_P14
Cambridgeshire Fire and Rescue Services	810/2/DEP02/05_P14
Papworth Hospital NHS Foundation Trust	834/2/DEP02/05_P14
	834/7/DEP02/05_P14

Summary of Objections

- There should be reference to meeting sub-regional needs.
- An updated fire station, dependent on enabling development, is needed at Parkside.
- Health care facilities should be included in the Policy, but should not be required to contribute to the provision of other facilities.
- New facilities should be integrated with existing communities.

Inspector's Reasoning and Conclusions

5.31.1. Chapter 10 deals with sub-regional needs and refers to relevant Structure Plan policies. This Policy and its supporting text is not the place to discuss site specific proposals. Contributions in these cases, where necessary, will be decided on the merits of the particular proposals.

5.31.2. The question of integrating new facilities is considered in section 5.27

above.

5.31.3. There are adequate definitions of community facilities in RDD Chapter 5. It is clear that hospitals and health care facilities fall within the definitions. A change to paragraph 5.32 proposed during the inquiry (FPC40) describes circumstances where providers of essential public infra-structure would satisfy the requirements of Policy 5/14. I support this proposed change. Finally, the Policy already allows for developers' contributions to be spent on health facilities. The fact that SPG does not is a matter for other parties, but I consider that a specific reference to health facilities alone in this general policy would not be appropriate.

RECOMMENDATION

5.31.4. I recommend no modification to this Policy of the RDD, but there is a relevant recommendation concerning paragraph 5.32.

5.32 PARAGRAPH 4.32(FDD)

Objections

The House Builders Federation	362/39/DEP01/04_32
Windsor Road Residents	366/19/DEP01/04_32
Laing Homes Ltd	708/27/DEP01/04_32
Wrenbridge Land Ltd	709/27/DEP01/04_32
Taylor Woodrow Developments Limited	710/27/DEP01/04_32

Summary of Objections

- Planning obligations can only be sought. They cannot be demanded.
- More detail is required on the use of negotiation to arrive at contributions.
- There should be severe penalties for failing to provide for needs generated by new development.

Inspector's Reasoning and Conclusions

5.32.1. There is no need in my opinion for further detail regarding the process of arriving at the contributions which will actually be required, nor to repeat criteria included in national policy. Paragraph 5.32 mentions the role of other material considerations in relation to the provision of community facilities through new development.

5.32.2. The matter of penalties for failing to provide facilities is dealt with elsewhere in this report.

RECOMMENDATION

5.32.3. I recommend no modification to the RDD as a result of these objections.

5.33 PARAGRAPH 5.32

Objections

Windsor Road Residents	366/29/DEP02/05_32
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Summary of Objections

- There should be severe penalties for failing to provide for needs generated by new development.
- The Citizens Advice Bureau Advice Hub should be specifically identified as a community facility that could be funded through planning obligations.
- An updated fire station, dependent on enabling development, is needed at Parkside.

Inspector's Reasoning and Conclusions

5.33.1. The first and third of the above objections are considered elsewhere in this report. The final sentence of the paragraph is correct and clear in its reference to the role of other material considerations. The Advice Hub is a specific facility which in my view should not be picked out for special treatment in this section of the Plan dealing with community facilities in general. My recommendation reflects my conclusions concerning Policy 5/14.

RECOMMENDATION

5.33.2. I recommend the modification of the RDD by the incorporation of FPC40.

5.34 PARAGRAPH 4.33 AND 4.34 (FDD)**Objections**

The House Builders Federation	362/40/DEP01/04_33
Laing Homes Ltd	708/48/DEP01/04_33
Wrenbridge Land Ltd	709/48/DEP01/04_33
Taylor Woodrow Developments Limited	710/48/DEP01/04_33
Laing Homes Ltd	708/49/DEP01/04_34
Wrenbridge Land Ltd	709/49/DEP01/04_34
Taylor Woodrow Developments Limited	710/49/DEP01/04_34

Summary of Objections

- More detail is required on the use of negotiation to arrive at contributions.
- Residential developers should not have to provide contributions towards childcare facilities such as nurseries and other features mentioned in paragraph 4.33.

Inspector's Reasoning and Conclusions

5.34.1. Policy 5/14 and its supporting text are not limited to the effects of residential development alone, and childcare facilities are an element of community facilities. Otherwise, these objections are addressed above.

RECOMMENDATION

5.34.2. I recommend no modification to the RDD.

5.35 PARAGRAPH 4.36 (FDD)**Objections**

Bidwells Property Consultants

396/35/DEP01/04_36

Summary of Objections

- It is difficult to see the practical consequence or benefit of subjecting privately-run schools to the sequential test.

Inspector's Reasoning and Conclusions

5.35.1. This paragraph has been renumbered 5.29 in the RDD, but otherwise remains unchanged. Applying the sequential test to major trip generating uses accords with national policy guidance relating to the location of development, and is aimed at reducing reliance on the private car for transport means. Bearing in mind the congestion that can be caused in the vicinity of schools as a result of children arriving or departing by private car, it is desirable for such uses to be located where there are alternative transport choices.

RECOMMENDATION

5.35.2. I recommend no modification to the RDD in response to this objection.

5.36 POLICY 4/16 (FDD) AND POLICY 5/15 (RDD)**Objections**

Countryside Properties	68/20/DEP01/04_P16
Mr. E. F. Holden	266/1/DEP01/04_P16
Medical Research Council	373/5/DEP01/04_P16
Addenbrooke's NHS Trust	399/12/DEP01/04_P16
Trumpington Environmental Action Group (TEAG)	460/15/DEP01/04_P16
South Cambridgeshire District Council	461/11/DEP01/04_P16
Addenbrooke's NHS Trust	399/11/DEP02/05_P15
	399/12/DEP02/05_P15
Trumpington Environmental Action Group (TEAG)	460/29/DEP02/05_P15
South Cambridgeshire District Council	461/8/DEP02/05_P15
Papworth Hospital NHS Foundation Trust	834/3/DEP02/05_P15
Countryside Properties/Liberty Property Trust	837/6/DEP02/05_P15

Pre-Inquiry Changes: SC5.004**Summary of Objections**

- Reservations are expressed on point c of Policy 4/16.
- Large parts of the Policy repeat other policies or are unnecessarily negative.
- Concerns are expressed about problems of traffic and parking at Addenbrooke's Hospital.
- The site is not suitable for business uses.
- The range of possible uses should be widened.

Inspector's Reasoning and Conclusions

5.36.1. Policy 5/15 in the RDD, which is the equivalent of Policy 4/16 in the FDD, no longer contains criteria making reference to traffic impacts and car parking, but requires development to be carried out in accordance with an agreed site Master Plan. There is also an Area Development Framework for the Southern Fringe Area, and preparation of this is well advanced. These changes address several of the objections to the FDD, although policies in Chapter 8 of the Plan will require the transport impacts of developments to be assessed and where necessary mitigated. There is clearly concern locally as to the parking and traffic arising from the Addenbrooke's development, but there is no need for a specific reference to these matters in the Policy as they will need to be addressed when detailed proposals are considered.

5.36.2. The major objector wishing to remove parts of the Policy because they repeat other policies supports the principle of a policy for Addenbrooke's, which is an institution of sufficient importance to the City and wider area to warrant particular attention in the Local Plan. To my mind it therefore merely remains to ensure that this Policy is consistent with other policies which have a substantial effect on Addenbrooke's. Given the advanced nature of the Area Development Framework, and the developers' intention to prepare a Master Plan (see Chapter 9), the reference to the Master Plan should remain in Policy 5/15. Land uses were debated as part of the inquiry sessions on the Southern Fringe. As a result, in Chapter 9 I conclude that Policy 9/5 should be amended to recognise the role played by wider medicine-related and support activities, some of them commercial. This is important to the local and wider economy. S106 agreements can be used to control land uses, as provided for in Policy 9/5 as recommended for modification. A change to Policy 5/15 is needed to reflect my conclusions.

5.36.3. As the Council agrees, the reference to secondary health care is not needed as this type of care is covered in other parts of the Policy wording.

RECOMMENDATION

5.36.3. I recommend that the RDD be modified by

- a) **the deletion from Policy 5/15 of the words "activities, higher education or research institutes" and their replacement by the words "research and development activities within Class B1(b), related support activities, related higher education and sui generis medical research institutions".**
- b) **the deletion from Policy 5/15 of the word "secondary".**

5.37 PARAGRAPH 4.37 (FDD) AND PARAGRAPH 5.35 (RDD)

Objections

Medical Research Council
 Addenbrooke's NHS Trust
 Addenbrooke's NHS Trust
 Countryside Properties/Liberty Property Trust

373/6/DEP01/04_37
 399/13/DEP01/04_37
 399/13/DEP02/05_35
 837/7/DEP02/05_35

Pre-Inquiry Changes: SC5.005

Summary of Objections

- It is unnecessary and gratuitous to refer here to Addenbrooke's being the largest generator of traffic in Cambridge.

- A wider range of land uses should be permitted at Addenbrooke's.

Inspector's Reasoning and Conclusions

5.37.1. The reference to Addenbrooke's traffic generation in paragraph 4.37 does not appear in the RDD, and other changes introduced in the RDD answer some other objections.

5.37.2. The land use references should be consistent with Policy 5/15.

RECOMMENDATION

5.37.3. I recommend that the RDD be modified by the deletion from paragraph 5.35 of the words "activities, higher education and research institutes" and their replacement by the words "research and development activities within Class B1(b), related support activities, related higher education and sui generis medical research institutions".

HOUSING AND EDUCATION OMISSION SITES

5.38 GENERAL POINTS CONCERNING HOUSING OMISSION SITES

5.38.1. Paragraph 30 of PPG 3 says that local Planning authorities should seek only to identify sufficient land to meet the housing requirement set as a result of the RPG and strategic planning processes. In doing so they do not need to consider all the land in their area and should not extend the search further than required to provide sufficient capacity to meet the agreed housing requirement.

5.38.2. Section 5.3 of this Chapter indicates that the housing requirement for Cambridge can be met by the Plan's provisions.

5.38.3. I have considered the objections made in respect of the omission from the Plan of the sites dealt with in the pages below, against the general background of a lack of need for further allocations. My assessment of each site is based on Policy 22 of RPG6; on the criteria of paragraph 31 of PPG 3; on my site visits; and on the evidence submitted by objectors and the Council. In some cases evidence on certain of the tests set out in PPG3 paragraph 31 is missing.

5.39 OMISSION SITE 2 – GLEBE FARM

Objections

Countryside Properties	68/23/DEP02/O2
Cambridge Preservation Society	26/3/DEP03/O2
D. Kendall	291/10/DEP03/O2
English Heritage	338/2/DEP03/O2
Trumpington Environmental Action Group (TEAG)	460/1/DEP03/O2
Residents Against Village Extinction (RAVE)	561/1/DEP03/O2
Highways Agency	697/1/DEP03/O2
RLW Estates	774/2/DEP03/O2
Malcolm Turner	827/2/DEP03/O2
Ms. U. Stubbings	859/2/DEP03/O2

Further Proposed Changes: FPC28 and FPC29

Summary of Objections

- The Glebe Farm site should be extended up to the line of the proposed Addenbrooke's access road, and Policy 9/5 should refer to this.
- The southern extension of the Glebe Farm site would take more Green Belt land, spoil the southern edge of the City, and harm the amenities of residents.
- There might be a cumulative effect on the M11.
- The City would be grid-locked.

Inspector's Reasoning and Conclusions

5.39.1. The southern boundary of the Glebe Farm allocation (Site 9.14) in the Southern Fringe should follow the line of the Addenbrooke's access road between Hauxton Road and Shelford Road. This gives a firm boundary to the new urban edge, which can be landscaped as the detailed nature of the development and the area requires. The site is close to the Trumpington Park and Ride, to the proposed CGB, and to the community of Trumpington, with its existing and proposed facilities and services. Public transport will be available to Addenbrooke's and other employment sites, as well as to the City Centre. In my opinion the sustainability of the allocation and the need to take the urban boundary up to the new road outweigh the consideration that the additional land is not previously developed land.

5.39.2. The Council's proposed amendment of the Proposals Map to show the larger Glebe Farm site is sufficient response to the Countryside Properties objection.

5.39.3. The Highways Agency comment is not an objection: the Agency agrees that any effects would need to be dealt with, including developer contributions as necessary. Some of the objections are predicated on the assumption that the site extension would be south of the new road, but that is not proposed. Otherwise, the objections are very similar to those against the original Glebe Farm site. I deal with the objections to the Glebe Farm site in Chapters 9 and 11. The overall scale of development in Cambridge is set by the Structure Plan, which has taken into account the levels of congestion in the City. The traffic effects of development will be considered by the relevant authorities, and both strategic and local provision should be made if needed, to limit demand and to cater for additional traffic. The Addenbrooke's access road is an example of this.

RECOMMENDATION

5.39.4. I recommend that the RDD be modified by the incorporation of FPC28 and FPC29.

5.40 OMISSION SITE 3 – MONSANTO SITE, TRUMPINGTON

Objections

Trumpington Meadows Land Company	798/30/DEP02/O3
D. Kendall	291/9/DEP03/O3
English Heritage	338/1/DEP03/O3
Trumpington Environmental Action Group (TEAG)	460/2/DEP03/O3
Mr. J. Fuller	558/1/DEP03/O3
Highways Agency	697/2/DEP03/O3
RLW Estates	774/3/DEP03/O3
Elizabeth Turner	826/1/DEP03/O3
Malcolm Turner	827/1/DEP03/O3

Pre-Inquiry Changes: SCPM.002 and SCPS.004**Summary of Objections**

- The boundaries of this site should be re-drawn to reflect topography and the proposed junction of the Addenbrooke's access road with Hauxton Road. The Council accepts that the site should be expanded to take in land to the west, plus the Park and Ride site together with some further land to the south, insofar as that land is within the City.
- The extension southwards would erode the Green Belt separating the City from the M11, spoil the southern approach to the City, cause too much traffic, and be harmful in other ways.
- There will be too much housing land unless some balancing deletion of allocations is made elsewhere.
- There could be some traffic impact on the M11.

Inspector's Reasoning and Conclusions

5.40.1. The Monsanto site is largely made up of previously developed land but this proposal would add further greenfield land which is at present within the Green Belt. There is no need for more such land in principle, but there are substantial advantages to increasing the size of the site, set out below.

5.40.2. The site will be sustainable in terms of its location and accessibility to jobs, shops and services by modes other than the car. In association with the development, a new primary school will be provided, together with other community facilities. The development aims to meet the day-to-day retail, community, leisure and alternative travel needs of residents on site. New facilities provided would be available to the existing population of Trumpington. The Park and Ride service will remain and the additional housing south of it would be very well served by public transport. Residents would be able to walk, cycle or catch a bus to the village centre. A Waitrose store is also nearby, closer to the site than the village centre. Buses and the proposed CGB will connect the development to the City Centre and to major employment sites. Public open space is to be provided on and near the land.

5.40.3. In the light of the proposed CGB and the Addenbrooke's access road, together with the existing public transport facilities, additional traffic will be minimised. The road can be expected not only to take traffic generated by the new development, but also to intercept traffic which would otherwise travel through Trumpington. There is no technical evidence that infra-structure inadequacies should prevent development here.

5.40.4. The proposal would extend development further along Hauxton Road, but there are excellent opportunities for building communities in this location. The proposal should form an extension of the existing community of Trumpington, and will support services and facilities in that village. The additional land should in my opinion be regarded as a sustainable addition to the existing community, lacking the disadvantages which can be associated with linear development.

5.40.5. There is, again, no technical evidence of physical or environmental constraints. M11 noise will be taken into account in the detailed planning of the scheme. As far as other objections are concerned, buildings of interest could be protected from harm by the detailed planning of the new development. The comment by the Highways Agency is not an objection, but the scheme would have to provide for impacts on the M11, if necessary.

5.40.6. Overall the extension of the Monsanto site meets all of the tests of paragraph 31 of PPG3, with the exception that it adds significant open land to the site. However the expanded site is based on a large core of previously developed land which is allocated for building.

5.40.7. There are further arguments in favour of allocating the additional land. I note that the proposed new north-western boundary of the site would depart only a little from the track on that side of the site. It is at the southern end of the site alongside Hauxton Road where the main addition of land would be.

5.40.8. At present the southern approach to Cambridge along Hauxton Road is not attractive because the first feature met with on the west side of the road is the Park and Ride site, with its large scale hard surfacing, parked cars, lighting, and fencing. The extension of the Monsanto site to take in land south of the Park and Ride offers the opportunity of placing a more attractive development at the gateway to the City. In addition, the new junction with the Addenbrooke's access road will be located in the vicinity, with housing beyond it on the eastern side of Hauxton Road. The combination of features, even without the additional land, will announce that the City has been entered.

5.40.9. It seems to me that the justification for allocating the land, including the advantages it would bring, set out above, outweigh the objections to it.

5.40.10. The question of impact on housing supply I deal with in section 5.3 above.

RECOMMENDATION

5.40.11. I recommend that the RDD be modified by the incorporation of SC PM.002 and SC PS.004.

5.41 OMISSION SITE 4 – NETHERHALL UPPER SCHOOL

Objections

The objections to this aspect of the Plan are listed in Annex 3.

Pre-Inquiry Changes: SCPM.001 and SCPS.006

Summary of Objections

- The Green Belt boundary should be drawn back to exclude part of the school site, as it severely limits scope for further expansion of the school.
- Such a proposed change is objected to on the grounds of loss of valuable amenity land, the effect on a nearby wildlife site and precedent. The proposed merger of the Upper and Lower Schools is opposed on the grounds of noise, increase in vehicular and cyclist traffic and litter.

Inspector's Reasoning and Conclusions

5.41.1. SC PM.001 and SC PS.006 would exclude the Omission site from the Green Belt and allocate it for school expansion. The area of land proposed to be excluded from the Green Belt does not contribute significantly to the compact character of Cambridge, plays only a minor part in the setting of the City and does not play a role in preventing the City from merging with other communities in the area. It would not, therefore, compromise the purposes of the Green Belt as set out in Policy P 9/2a of the Structure Plan. Structure Plan Policy P 9/2b sets out a number of matters the Council should have regard to in determining the boundaries of

areas to be released from the Green Belt. In my opinion the release of this piece of land would not cause harm in respect of any of those matters.

5.41.2. The proposed change, which would only involve a small piece of land, would not affect any of the existing playing fields. Although the school site as a whole adjoins a designated wildlife site, a buffer of Green Belt land would remain between that site and the land to be excluded from the Green Belt. There is no evidence that this change would cause undue harm to any wildlife interests. Because of the very small area of land involved, and because the objectives of the Green Belt would not be compromised by this change in boundary, it would not create a harmful precedent.

5.41.3. Many of the objections to the proposal to modify the Green Belt boundary are, in essence, objections to the proposed amalgamation of Netherhall Upper and Lower Schools on the present site of the Upper School. Whether or not these two schools should be amalgamated is a matter for the County Council as education authority, and not for this Plan. There is no detailed proposal before this inquiry for the construction of new school buildings, and objections relating to the physical consequences of any new buildings are more appropriately addressed at planning application stage.

RECOMMENDATION

5.41.4. I recommend that the RDD be modified by the incorporation of SC PM.001 and SC PS.006.

5.42 OMISSION SITE 5 – NETHERHALL FARM

Objections

The objections to this aspect of the Plan are listed in Annex 3.

Summary of Objections

- This land should be allocated as an urban extension. It is near employment, public transport and other facilities and services. Not all of the site would be developed.
- The site should not be allocated for environmental, amenity and traffic reasons.

Inspector's Reasoning and Conclusions

5.42.1. This land is in a sustainable location in respect of accessibility to services and employment. There are no objections based on infra-structure problems or difficulties in building communities. The site is on the other hand a large area of open land, within the Green Belt and outside the built-up area. It is not needed to make up the City's housing supply. The Structure Plan, having considered this site specifically, does not provide for the release of land from the Green Belt in this area.

5.42.2. Even if development were to be limited to the western part of the site, the open land of that part of the site would be lost, and this land is well seen in the foreground in views from Lime Kiln Hill and Worts Causeway. The land is seen more distantly in views from the Gog Magog Hills. In some of the relevant views the site is part of the green foreground in wider prospects over the urban area. The site is important to the setting of the City and should remain part of the Green Belt. The land does not have the advantages for development which the Southern

Fringe offers. It is not seen against the background of Addenbrooke's and does not have the kind of screening enjoyed by parts of the Southern Fringe.

5.42.3. There are not exceptional circumstances to justify removing the site from the Green Belt.

RECOMMENDATION

5.42.3. I recommend no modification to the RDD.

5.43 OMISSION SITE 6 – PHASE II OF THE FORMER BLUE CIRCLE SITE, COLDHAM'S LANE

Objections

The objections to this aspect of the Plan are listed in Annex 3.

Summary of Objections

- The site is more sustainable than many of the allocated housing sites and should therefore be allocated for housing, with commercial uses on the Coldhams Lane frontage.
- The gas generation from the contaminated land underlying the site can be managed satisfactorily.
- The land has insufficient wildlife or open space value to warrant protection for these reasons.
- It would be unsafe to develop this site. Development would harm wildlife, reduce open space available, increase traffic and overload services.

Inspector's Reasoning and Conclusions

5.43.1. The Council accepts that the Phase II element of the former Blue Circle land is previously developed land, as a former landfill site, and that it would be a sustainable housing site by virtue of its accessibility to services. It is within the built-up area.

Contaminated Land

5.43.2. This site has been landfilled and contains some very high concentrations of methane. The concentrations are higher than in the sites referred to by the landowner, where housing development has taken place or is in course of preparation. High concentrations give high risk. Low flows of gas reduce the risk, and there is some evidence of low flows at this site. However, the information available on flows is limited to 2 months of measurement, rather than the 6 months which would reduce the risk level from its present 6 (the highest) to 5. There is insufficient information to enable a good understanding of the site's characteristics.

5.43.3. A suite of measures is available to block the pathway of methane to houses and parking spaces. A high permeability layer would be inserted into the tip to collect gas, which could then be vented harmlessly. Above this layer would be a low permeability barrier to gas movement. Roads and services would be raised above this layer. Buildings would be raised above ground level, with undercroft parking beneath them. A management company would, amongst other things, police the site to prevent unsuitable repairs or alterations to properties and to the

parking areas.

5.43.4. Many other measures could also be taken, but there are possible scenarios which would lead to the danger of explosion and the risk of fatalities. The management of the development may not always be effective, and enclosed spaces might be introduced into undercrofts, or the barrier might be penetrated even if garden areas are intended to be communal. No barrier is completely safe.

5.43.5. The onus is on the landowner to show that the site can be developed safely. The owner has not carried out a quantitative audit, which is in my opinion necessary at this stage because of the high concentrations of gas and the imperfect knowledge of other site characteristics. Without a full risk assessment there is insufficient evidence to show that there would be no residual risk. In my view a precautionary approach should be taken to the proposal: housing is a use which is particularly sensitive to contamination, there is no need for housing here, and there is a residual risk to the safety of prospective residents.

5.43.6. The objector intends to carry out a quantitative audit at the planning application stage. No party knows whether a housing development, which has not yet been detailed, would pass the necessary tests at the application stage. On the other hand land contamination is a material consideration at the development Plan stage, and PPS23 is clear that contamination can preclude certain uses.

5.43.7. Although the Environment Agency does not object to the principle of development, there is a fundamental land use objection to the allocation of this land for housing on the basis of present evidence.

5.43.8. A decision not to allocate in this case does not threaten the national drive to redevelop previously developed land. PPS 23 paragraph 16 requires a balanced approach, which in this instance leads me to conclude against allocation.

Wildlife Value

5.43.9. Recent survey information is available for the site. The objector agrees with the Council that the site meets the criteria for City Wildlife Sites, but argues that the criteria are set so low that the site is effectively of limited interest. These criteria are not part of the RDD and I do not make recommendations in relation to them.

5.43.10. There is a mosaic of habitats, although one which is not unusual on urban wasteland. However the site contains one of the largest areas of scrub in the City, where there is little scrub generally. The species found are common, again typical of species found in these situations and in urban gardens, but there are 19 breeding bird species, with a high density of individual territories. About 30 bird species were recorded on the site. The bird species assemblage is good for Cambridge. There is a small population of common lizards, which occur only sporadically in the City.

5.43.11. The site's function in relation to a possible network of habitats is limited by the built-up surroundings on most sides and the railway which separates it from the open land to the south-west. However the railway will not be a barrier to bird species.

5.43.12. Overall I conclude that the site has importance for biodiversity in the local, Cambridge, context. It appears to me that this is a valid level at which to make an assessment as the City is a community with a population of over 100,000. For this reason, and in recognition of the fact that the site fulfils the necessary criteria, designation as a City Wildlife Site is appropriate.

5.43.13. West of the site is a developed area and beyond that is a further completed landfill site owned by Land Securities Group Plc. This former landfill site

is capable of providing sufficient mitigation to replace the value for biodiversity of the objection site. It seems to me therefore that the City Wildlife Site designation of the Phase II site should not prevent the allocation of the site for housing.

Open Space Value and Overall Conclusion

5.43.14. This site is best described as urban wasteland. It is unkempt, overgrown and unattractive, with substantial areas of scrub and bare ground. It is cut off from other open land by development and by the railway: nearby buildings can be seen from much of the land. It should not be designated as protected open space for any other reason than its designation as a City Wildlife Site. However, again, the designation need not prevent an allocation for housing as the wildlife value could be recreated on the western site.

5.43.15. Although I conclude that the site does not have appreciable value as open space, other than its biodiversity value, and that its contribution to biodiversity could be recreated on land further west, I also conclude that it should not be allocated for housing. This is because of the over-riding risk arising from the contaminated land.

RECOMMENDATION

5.43.16. I recommend no modification to the RDD in response to the housing allocation objection. My recommendations concerning related objections are given elsewhere in this report.

5.44 OMISSION SITE 7 – LAND ADJOINING PETERHOUSE TECHNOLOGY PARK

Objections

The objections to this aspect of the Plan are listed in Annex 3.

Summary of Objections

- This land should be removed from the Green Belt and allocated for housing and/or employment uses.
- The land should not be allocated for environmental, Green Belt, recreational, wildlife and traffic reasons.

Inspector's Reasoning and Conclusions

5.44.1. I deal here with the possible housing allocation. The employment allocation objection is considered below, at the end of Chapter 7.

5.44.2. The landowner's evidence, unanswered by the Council, is that the site is sustainable in that there are good bus services along the nearby main road. There are employment opportunities on the adjoining Technology Park. No infra-structure problems would prevent development. Evidence is lacking as to whether housing development would help to build communities, and there is no technical evidence regarding other matters such as wildlife.

5.44.3. However I give greater weight to the facts that the objection site is open land, in the Green Belt, and outside the urban area. The Green Belt boundary here is clear and firm, and the site acts to safeguard the countryside on the edge of Cambridge from further encroachment. There is also no need for the land to be released for housing: the RDD, following the Structure Plan, releases sufficient land

from the Green Belt elsewhere in the City. The allocation requested in this objection should not be made.

RECOMMENDATION

5.44.3. I recommend no modification to the RDD.

5.45 OMISSION SITE 8 – PORSON ROAD PLAYING FIELD

Objections

The objections to this aspect of the Plan are listed in Annex 3.

Summary of Objections

- This sustainable site should be allocated for housing, as it has little open space value which could not be replaced elsewhere.
- The site should not be allocated, principally for visual, recreational and traffic reasons.

Inspector's Reasoning and Conclusions

5.45.1. The Council does not argue that the site is unsustainable, or that it would not meet most of the requirements of paragraph 31 of PPG3, with one important exception.

5.45.2. The site has some visual value to residents of neighbouring houses but is not visible from public places, and those trees of good quality located on the edges of the land could be retained in any development.

5.45.3. However the site is used as playing fields by a nearby school, and therefore has recreational and educational value. There is no indication that replacement land of equal value could be provided, and the Council's assessment of open space in the City finds that there is very little recreational land surplus to requirements. On the other hand there is adequate housing land available without the need to build on this site.

5.45.4. A housing allocation is not justified.

RECOMMENDATION

5.45.5. I recommend no modification to the RDD.

5.46 OMISSION SITE 9 – DAWS LANE

Objections

The objections to this aspect of the Plan are listed in Annex 3.

Summary of Objections

- Development could take place on the allotments forming part of this site, and on vacant land north of Cherry Hinton Brook, with the disused chalk pit remaining as open space.

- None of the land should be allocated for housing. It is of wildlife value and forms a green corridor and buffer linking other open spaces and giving communities separate identities.
- Further objections to allocation are that the allotments are used, access and local roads are inadequate, and footpaths and cycleways through the area are well used and very pleasant.

Inspector's Reasoning and Conclusions

5.46.1. The site is in a sustainable location, on the basis of the evidence I have, and there is no evidence of infra-structure problems with the development of the southern area as suggested. The land is close to Cherry Hinton and could form part of that community.

5.46.2. However a major part of the site suggested for development is allotments, and there is no specific proposal to replace them on a suitable site. The objection land as a whole forms part of a larger and important area of open space which should be protected as a green 'lung'. I conclude in paragraph 4.7.8 that the area as a whole should be protected open space, and the objector's proposal to provide recreational facilities with other landowners is inappropriate as part of a development scheme.

5.46.3. To my mind the value of the land as open space is a substantial environmental reason why the land should not be allocated for development, and outweighs the ways in which the site measures up positively against other tests in paragraph 31 of PPG3.

RECOMMENDATION

5.46.4. I recommend no modification to the RDD.

5.47 OMISSION SITE 11 – LAND BEHIND QUEEN EDITH'S WAY

Objections

The objections to this aspect of the Plan are listed in Annex 3.

Summary of Objections

- This small site between houses and a caravan park would be suitable for housing development.
- No housing allocation should be made. The land is Green Belt, there is no suitable access and no direct pedestrian linkages to the built-up area. The site and surroundings are of considerable wildlife value.

Inspector's Reasoning and Conclusions

5.47.1. There is little evidence as to the sustainability of this site in terms of accessibility to jobs and services by means of transport other than the car. There is no technical evidence regarding wildlife and access/traffic problems. However the over-riding consideration in my view is that the site is open land forming part of the Green Belt and outside the built-up area of the City. The caravan park and other land to the south and south-west of the site is also part of the Green Belt. The site helps to safeguard the countryside on the edge of Cambridge from further encroachment. In addition there is no need for the land to be developed.

RECOMMENDATION

5.47.2. I recommend no modification to the RDD.

5.48 OMISSION SITE 12 – LAND TO THE WEST OF LECKHAMPTON HOUSE

Objections

The objections to this aspect of the Plan are listed in Annex 3.

Summary of Objections

- Land to the west of Leckhampton House should be allocated for open market housing.
- Objections are made to the allocation of the site on the grounds of loss of a sports facility, absence of need, risk of flooding, increased traffic, harm to wildlife interests and the effect on the setting of Leckhampton House.

Inspector's Reasoning and Conclusions

5.48.1. This site is a sports ground, and the Council in its open space and recreation strategy has identified it as being of recreational importance. There is no evidence that any assessment has been undertaken as to whether this open space is surplus to requirements. For that reason, the allocation of the site for housing would not accord with the advice in PPG 17.

5.48.2. The majority of the site is also shown on the Proposals Map as lying within a flood zone, with one of its boundaries being formed by the Bin Brook, and counter objections to the allocation indicate flooding of the site as recently as 2001. Given that adequate land has already been identified in the Plan to meet the strategic housing requirement, the allocation of this site for housing would be in conflict with the advice in PPG 25.

5.48.3. These two significant constraints on development make the site unsuitable for allocation for housing.

RECOMMENDATION

5.48.4. I recommend no modification to the RDD.

5.49 OMISSION SITE 13 – LAND WEST OF DITTON WALK

Objections

Gonville & Caius
Cambridge Preservation Society
RLW Estates

398/1/DEP01/PM/O13
26/14/DEP03/O13
774/11/DEP03/O13

Summary of Objections

- Land at Ditton Walk should be allocated for housing. It is in a sustainable location and historically an area of mixed residential and employment use.
- The setting of the City may be affected, there is no need for additional allocations for housing, and the site is needed for University purposes.

Inspector's Reasoning and Conclusions

5.49.1. This site lies within the urban area and is previously developed land in a mixed use area with housing on the opposite side of the road. It is not allocated for any other purpose in the Plan, and subject to appropriate design there would be no need for development to affect the setting of the City, despite the site's location adjoining the Green Belt boundary. The Council acknowledges that there may be some potential for residential development in this location, and notes that the site was included in the Urban Capacity Study. However, only sites of 0.5 ha or more have been specifically allocated for housing under Policy 5/1. This site, at 0.276 ha, is therefore too small to be included as an allocation.

RECOMMENDATION

5.49.2. I recommend no modification to the RDD.

5.50 OMISSION SITE 14 – LAND NORTH OF LONG ROAD**Objections**

The objections to this aspect of the Plan are listed in Annex 3.

Summary of Objections

- This land does not fulfil any of the purposes of including land in the Green Belt. The eastern part could be allocated for housing development, leaving the western section to function as a green corridor.
- There should be no housing allocation. The land is important for Green Belt, recreational, and wildlife reasons. There are also access and traffic objections.

Inspector's Reasoning and Conclusions

5.50.1. The site is within the built-up area but is a greenfield site. Although the land is in a sustainable location, the site as a whole performs the function of a green corridor. Such corridors are part of the character of the City, and those penetrating the built-up area, as in this case, are often included in the Green Belt. The width of the land north of Long Road is an important part of its character and assists its corridor function. There is no shortage of housing land, and a housing allocation would not be appropriate, whereas the current Green Belt designation is appropriate.

RECOMMENDATION

5.50.2. I recommend no modification to the RDD.

5.51 OMISSION SITE 15 – LAND NORTH OF BARTON ROAD**Objections**

The objections to this aspect of the Plan are listed in Annex 3.

Summary of Objections

- Land at Barton Road should be allocated for development.

- The allocation of the site is objected to on the following grounds: the land is in the Green Belt, good-quality agricultural land would be lost, the setting of the City would be harmed, the proposal is premature, there would be a risk of flooding, the proposal would lead to traffic congestion, there would be harm to wildlife and recreation interests and to archaeological interests, and there is insufficient infrastructure.
- The proposed allocation is supported subject to the provision of a balancing pond and bus service, as the land does not fulfil a Green Belt function.

Inspector's Reasoning and Conclusions

5.51.1. This area of Cambridge is not one of those identified in Structure Plan Policy P 9/2 c for housing and mixed use development, and where local planning authorities are required to carry out a review of the Green Belt. Studies of the wider Green Belt west of the City have identified little scope for change if the purposes of this part of the Green Belt are to be maintained, a conclusion endorsed by the Structure Plan EIP panel in considering a proposal for development in this location of a far larger scale than proposed now.

5.51.2. The Council's own more detailed review of the inner Green Belt boundaries identifies a smaller area including this omission site as having only a medium importance to the setting of the City and a medium importance to the Green Belt itself. However, it did not recommend removing the area from the Green Belt. I agree with the Council that development on the omission site would have at least a medium effect on the Green Belt, as it would have a detrimental impact on views of the City Centre from rising ground to the west. I also note that the objection would result, for the present at least, in a boundary that is not defined on the ground.

5.51.3. Land has been released from the Green Belt south of Addenbrooke's Hospital and between Madingley Road and Huntingdon Road, but that is as a result of the recommendations of the Structure Plan EIP Panel. There is no justification in terms of housing need for the removal of this site from the Green Belt.

5.51.4. Turning to the tests in paragraph 31 of PPG3, the major objections raised by the Council to the site's allocation relate to accessibility by public transport to jobs, shops and services, and flooding issues. On accessibility, the site is not particularly close to local services and facilities. Whilst cycle and pedestrian accessibility to the City and Cambridge University's West Cambridge site is reasonable, bus services would need significant improvement to make the site reasonably accessible by public transport to the City Centre and to employment areas. The Structure Plan EIP Panel expressed serious doubts as to whether even the significantly larger development proposed at that stage at Barton Road would be able to deliver the high level of patronage to support a high quality public transport system. What is proposed here would be much smaller, even if it incorporated land in South Cambridgeshire, and would be even less able to support long-term public transport improvements.

5.51.5. A significant part of the site is identified as being at risk of flooding. It might be possible for improvements to be made to the Bin Brook to increase flood capacity, both to increase the developable area of the site and to alleviate existing problems affecting nearby residents. But the absence of any evidence as to whether the development would be able to fund adequate improvements, or any details as to the views of the Environment Agency on the proposed allocation, leads me to conclude that the current risk of flooding represents a significant constraint on the development of the site.

5.51.6. For all of these reasons, I conclude that this site should not be allocated for housing, and that there are no exceptional grounds for altering the Green Belt boundary in this location.

RECOMMENDATION

5.51.7. I recommend no modification to the RDD.

5.52 OMISSION SITE 18 – ANSTEY HALL FARM

Objections

The objections to this aspect of the Plan are listed in Annex 3.

Summary of Objections

- The site should be excluded from the Green Belt so that it could be used for housing/care home facilities with associated community functions.
- These Listed Buildings next to Trumpington Church and facing the approach road to the village should remain in the Green Belt.
- Trumpington is facing massive development even without this site.

Inspector's Reasoning and Conclusions

5.52.1. The site is well placed in a sustainable location on the edge of Trumpington. It has several of the advantages of the neighbouring Monsanto site. However it is partly open land and partly occupied by disused agricultural buildings. It is not previously developed land, but is located within the Green Belt outside the built-up area of the City. The open land on the western side of the site, and the long range of old buildings facing this land, are an important part of the setting of Trumpington and of the Conservation Area. The village ends where a group of cottages is situated opposite the church, and this is where the Green Belt boundary is appropriately located.

5.52.2. There is no need for the land to be allocated for housing, and, as a positive element contributing to the character of the City, the site fulfils a Green Belt purpose. The opportunity to provide a link between new development to the south and village facilities does not outweigh the above considerations. There are not exceptional circumstances which would necessitate a revision of the Green Belt boundary here.

5.52.3. The question of re-using the existing buildings is for the Council to decide in the context of any proposal placed before them.

RECOMMENDATION

5.52.4. I recommend no modification to the RDD.

5.53 OMISSION SITE 20 – FITZWILLIAM COLLEGE SPORTS FIELD AT OXFORD ROAD

Objections

The objections to this aspect of the Plan are listed in Annex 3.

Summary of Objections

- The site should not be designated as a protected open space, but should be allocated for housing.
- Objections are made to the proposed allocation on the grounds of loss of recreational facilities and open space, harmful increase in traffic, flooding, effect on wildlife interests, pressure on local services and harm to residential amenity. The ground is a war memorial and should be retained.
- Cambridge University supports the proposed allocation and is prepared to provide land for replacement playing fields.

Inspector's Reasoning and Conclusions

5.53.1. The site is a sports field, and in its Open Space and Recreation Strategy the Council has identified it as having both environmental and recreational importance. There is no evidence of any assessment having been undertaken showing that the site is clearly surplus to requirements, and indeed the representations to the Inquiry suggest that it is a well used sports field, in an area where there is a deficiency in recreational facilities. Although it appears that alternative land can be made available to replace the sports facilities on this site, there is no assessment as to whether that would be at least as accessible to current and potential new users as the site, and at least equivalent in terms of size, usefulness, attractiveness and quality. Clearly, however, the development of this site would deprive the occupiers of properties immediately adjoining it of the benefit of the open space, and that benefit would not be replaceable. The allocation of the site would therefore conflict with the advice in PPG17.

5.53.2. Turning to the tests in paragraph 31 of PPG3, the site is not previously developed land, but it is clear that the strategic housing requirement could not be met entirely on previously developed land in the City. The site is located in the urban area, and is reasonably accessible to jobs, shops and services by modes other than the car. The question of infrastructure provision is dealt with elsewhere in the Plan, but there is no evidence that infrastructure could not be provided to serve this site. As the site is located in a relatively densely developed residential part of the City, the question of ability to build new communities does not arise. However, the environmental and recreational importance of the site represents a significant physical constraint on its development, leading me to conclude that the site should not be allocated for housing.

RECOMMENDATION

5.53.3. I recommend no modification to the RDD.

5.54 OMISSION SITE 21 – FIELD TO WEST OF PROPERTIES FRONTING SHELFORD ROAD

Objections

The objections to this aspect of the Plan are listed in Annex 3.

Summary of Objections

- Allocation 9.14 should be extended southwards to achieve a defensible Green Belt boundary and provide more housing.

- There is no need for this Green Belt land to be allocated for housing.

Inspector's Reasoning and Conclusions

5.54.1. As an extension to Site 9.14 the objection land would be an expansion of Trumpington and might be expected to share some of the sustainability advantages of other sites near the village, although the parties do not provide evidence on this point.

5.54.2. However the extension would breach the line of the Addenbrooke's access road, extending and adding to the urban development to the south. The road is the best boundary between the urban area and the Green Belt, and will provide a firm boundary across the extensive sector between Hauxton Road and Shelford Road. The site is open land within the Green Belt and outside the built-up area. There is no need for it to be allocated for housing.

RECOMMENDATION

5.54.3. I recommend no modification to the RDD.

5.55 OMISSION SITE 22 – LAND BETWEEN CLAY FARM SITE AND ADDENBROOKE'S HOSPITAL

Objections

The objections to this aspect of the Plan are listed in Annex 3.

Summary of Objections

- This land should be safeguarded for housing in the long term because of the inadequacy of such provision.
- The land should remain in the Green Belt, principally for environmental reasons.

Inspector's Reasoning and Conclusions

5.55.1. There is no need for the land to be released to provide housing during the Plan period. The East Cambridge Area of Major Change will provide substantial areas for housing development post-2016. The urban area can be expected to offer further opportunities for long term development. The location of a waste recycling facility for Cambridge has yet to be decided. I do not consider that it is necessary to make additional housing land provision on this objection site, to replace land lost to a potential recycling centre, as the recycling centre will not necessarily be located in the Southern Fringe. There is no evidence that the use of land for a secondary school will prevent the Southern Fringe from providing the number of dwellings estimated in the RDD.

5.55.2. The objection site is located within the Green Belt corridor separating the new developments proposed for Addenbrooke's and east of Trumpington. The allocation proposed by the objector would in the long term narrow the green corridor so much as to threaten its function as a major open space and Green Belt finger connecting the countryside with the City's main built-up area. The green corridor as proposed in the RDD need not have the appearance of the relatively featureless arable land occupying the objection site now.

5.55.3. The objection site will be separated from Trumpington and its facilities by

distance and by the remains of the green corridor. The existing railway line forms a suitable boundary to development, but if housing is built to the west of the line, both the railway and the proposed CGB will be partial barriers to movement. Housing here would have some accessibility disadvantages.

5.55.4. The ability of housing on the site to improve security in the green corridor is a less weighty consideration than those I consider above.

RECOMMENDATION

5.55.5. I recommend no modification to the RDD.

5.56 OMISSION SITE 23 – CAMBRIDGE UNITED FOOTBALL CLUB

Objections

Cambridge United Football Club/Bideawhile 445 Ltd	789/3/DEP02/PS/O23
Cambridge Preservation Society	26/24/DEP03/O23
D. Kendall	291/1/DEP03/O23
Sport England	365/4/DEP03/O23
RLW Estates	774/18/DEP03/O23
John Young	897/1/DEP03/O23
Peter Fenton	1253/1/DEP03/O23
Tony Tarrant	1319/1/DEP03/O23
Michael Bond	1356/5/DEP03/O23

Summary of Objections

- The club could relocate, and so the existing ground should be allocated for housing, on the same basis as in the existing Cambridge Local Plan.
- This is a strategic sports facility and playing field in an accessible location.

Inspector's Reasoning and Conclusions

5.56.1. The club is a recreational and entertainment resource accessible to the people of the City. Policies of the RDD as proposed to be changed would allow for the relocation of the club and the redevelopment of the site for housing. However, a suitable relocation site would have to be found, bearing in mind the accessibility of the existing stadium. There is no evidence that such a site has yet been found, and therefore the housing allocation should not be made.

5.56.2. It appears that the Cambridge City ground, dealt with in Chapter 11 of this report, is being treated differently in the RDD from Cambridge United's Abbey Stadium. However it may be that there are planning reasons for this of which I am not aware. Therefore, and particularly in the absence of further information concerning the position of Cambridge City, I take the view that I do not have a sufficient basis to conclude that the same recommendation to allocate the grounds for housing should be made for both grounds.

RECOMMENDATION

5.56.3. I recommend no modification to the RDD.

6. ENJOYING CAMBRIDGE

6.1 WHOLE CHAPTER

Objections

Trumpington Environmental Action Group (TEAG)	460/17/DEP01/05
Brunswick & North Kite Residents Association	676/1/DEP01/05
Whiteley & Creasey (Anglia) Limited	699/2/DEP01/05
Teresa Brett	729/1/DEP02/06

Summary of Objections

- There are no policies to protect roadside verges, or wildlife sites generally, to replace/promote local amenities lost on redevelopment, or to encourage retail warehousing especially on Newmarket Road.

Inspector's Reasoning and Conclusions

6.1.1. The wording of Policy 4/3 clearly relates to the protection and enhancement of features of the landscape which are of amenity or nature conservation importance. Not all such features are located in designated sites. However the important elements which TEAG fears are not covered by the Plan would be protected where they are of amenity or nature conservation importance. Policies 4/5 and 4/6 protect sites known to be of wildlife value.

6.1.2. There are several policies protecting existing facilities of various types. The loss of a valuable facility would be a material consideration in the assessment of a development proposal, if relevant, and could lead to the incorporation of a replacement. However changes of use within a Use Class can occur without the need for planning permission, and it is not feasible for the Plan to attempt to reserve shops in Burleigh Street for local traders. Also, whether a facility such as a new or replacement shop is actually occupied depends on the market. Similarly the Plan cannot determine whether finance could be made available for new or replacement facilities.

6.1.3. The new policies suggested should not therefore be added to the Plan.

6.1.4. I consider retail warehousing below.

RECOMMENDATION

6.1.5. I recommend no modification to the RDD.

6.2 POLICY 5/8 (FDD), POLICY 6/1, AND PARAGRAPH 6.3 (RDD)

Objections

The Bursars' Committee of the Cambridge Colleges	87/16/DEP01/05_P08
Green Property	337/3/DEP01/05_P08
Bidwells Property Consultants	396/41/DEP01/05_P08
Peter Convey	766/6/DEP02/06_P01

Summary of Objections

- Redevelopment of existing leisure uses should be permitted where the need for a particular leisure facility has reduced.
- It is wrong to include private sector facilities which rely on the market.
- Recreational sites and premises should be retained in uses which are orientated towards recreation and leisure.
- The River Cam is not covered.

Inspector's Reasoning and Conclusions

6.2.1. The first of the above objections has been partly met by the inclusion of paragraph 6.4 in the RDD, but given the expanding population of Cambridge efforts should be made to find alternative leisure uses before permitting development for other uses. Private sector facilities can often have public benefits and it is reasonable for the Policy to protect these benefits.

6.2.2. Not all recreational and leisure sites can be retained in such uses, for example where need or demand declines and no suitable alternative recreational or leisure use can be found which is suitable for the site. In these circumstances it is better to find another use rather than, perhaps, keep a building empty. There are also circumstances, set out in the Policy, where replacement or relocation would be acceptable or would lead to better provision.

6.2.3. I deal with the River Cam in Chapter 3 above.

RECOMMENDATION

6.2.4. I recommend no modification to the RDD.

6.3 POLICY 5/9 (FDD), POLICY 6/2 AND PARAGRAPH 6.5 (RDD)

Objections

Sport England
Bidwells Property Consultants
The Perse School for Boys
Land Securities Group Plc

365/4/DEP01/05_P09
396/42/DEP01/05_P09
754/11/DEP02/06_P02
37/4/DEP04/06_P02
37/8/DEP04/06_05

Pre-Inquiry Changes: CCC301 and CCC302

Summary of Objections

- Impact on all leisure facilities should be considered, not just that on City Centre facilities.
- Public access to private facilities cannot be expected.
- The former Blue Circle land should not be included.

Inspector's Reasoning and Conclusions

6.3.1. Following national policy, it is centres which should be promoted. Commercial competition should not be limited by Plan policies. Impacts on facilities

outside the City Centre should not be the concern of this Policy.

6.3.2. In the RDD public access to private facilities is not required, but it is reasonable to expect such access in some cases where leisure facilities are being provided through educational development. Even here, there will be instances where a purely private facility is being provided. Thus I support the use of "may" rather than "will" in the Policy.

6.3.3. I deal with the former Blue Circle site elsewhere in this report (see especially under Proposal Site 6.01 in Chapter 11). As far as this particular objection is concerned, as there are no realistic proposals to provide new leisure or recreational facilities or uses on any of the land, there should be no reference to the land under Policy 6/2. A recommendation regarding the site is not needed under this Policy as the matter arises only as a result of a proposed change.

RECOMMENDATION

6.3.4. I recommend that the RDD be modified by replacing "will" with "may" in the penultimate line of Policy 6/2, and that the pre-inquiry changes CCC301 and CCC302 should not be incorporated.

6.4 PARAGRAPH 6.6

Objections

South Cambridgeshire District Council

461/9/DEP02/06_06

Pre-Inquiry Changes: SC6.001

Summary of Objections

- Cambridge is a sub-regional, not a regional, centre.

Inspector's Reasoning and Conclusions

6.4.1. The proposed change answers the objection. Additional wording about the exceptional position of regional facilities is not necessary.

RECOMMENDATION

6.4.2. I recommend that the RDD be modified by the incorporation of SC6.001.

6.5 POLICY 6/3 AND PARAGRAPH 6.9

Objections

Peter Convey

766/7/DEP02/06_P03
766/18/DEP02/06_09

Summary of Objections

- The Plan must include explicit recognition of the tourist boat fraternity and their needs.

Inspector's Reasoning and Conclusions

6.5.1. I deal with the River Cam in Chapter 3 of this report.

RECOMMENDATION

6.5.2. I recommend no modification to the RDD.

6.6 POLICY 5/11 (FDD), POLICY 6/4, AND PARAGRAPHS 6.12 AND 6.13 (RDD)

Objections

Cambridge Preservation Society
Bidwells Property Consultants
Conservators of the River Cam

26/29/DEP01/05_P11
396/43/DEP01/05_P11
755/1/DEP02/06_P04
755/10/DEP02/06_12
755/11/DEP02/06_13

Summary of Objections

- The Policy is ambiguous and aspirational. It does not control development.
- There is a need for more off-river moorings.

Inspector's Reasoning and Conclusions

6.6.1. In the RDD the Policy and supporting text have been reworded to avoid ambiguity and to focus on the cultural heritage and interpretation of the City. Cambridge is an important destination for tourists. A policy is necessary to control development but a blanket refusal to permit further visitor attractions would be very onerous. The Policy contains a test which would be effective in development control.

6.6.2. I consider moorings on the River Cam in Chapter 3, under omission site 17 Fen Road.

RECOMMENDATION

6.6.3. I recommend no modification to the RDD.

SHOPPING

6.7 PARAGRAPH 6.14

Objections

Cambridgeshire County Council

55/32/DEP02/06_14

Summary of Objections

- RSS14 includes a policy encouraging development supporting the use of local produce.

Inspector's Reasoning and Conclusions

6.7.1. The objection refers to a draft document. It would be premature to include

such a policy in the Local Plan.

RECOMMENDATION

6.7.2. I recommend no modification to the RDD.

6.8 POLICY 5/12 AND PARAGRAPHS 5.32-5.33 (FDD) POLICY 6/5 AND PARAGRAPHS 6.15-6.19 (RDD)

Objections

Turnstone Estates	47/13/DEP01/05_32 47/12/DEP01/05_P12
Marks and Spencer Plc	367/3/DEP01/05_P12
Land Securities Properties Ltd	371/6/DEP01/05_P12 371/8/DEP01/05_33
BT Plc	376/12/DEP01/05_P12 376/1/DEP02/06_P05
Bidwells Property Consultants	396/44/DEP01/05_33
WM Morrison Supermarkets Plc	406/6/DEP01/05_32 406/1/DEP02/06_17 406/1/DEP01/05_P12 406/2/DEP02/06_P05 406/7/DEP01/05_33
South Cambridgeshire District Council	461/8/DEP01/05_P12
Miss G. M. Owst	537/4/DEP01/05_P12
Prudential Assurance Company Limited	696/1/DEP02/06_19

Summary of Objections

- There is a need for further major retail development. Retail development is especially important for the City Centre.
- A criteria-based retail policy and a requirement for need analysis should form part of the Plan.
- Various wording changes to Policy 6/5 and to supporting text are suggested.
- The Grand Arcade shopping proposal and the Grafton Centre extension should be allocations.
- Further extensions to the Grafton Centre would be prevented by the Plan.
- There are too many eating establishments and too few food and other shops.

Inspector's Reasoning and Conclusions

6.8.1. There have been several changes between the FDD and the RDD, which meet many of the objections in part or in whole. Thus the Plan now includes a re-written City Centre retail policy, and references to the national policy tests for retail development. These references, in paragraph 6.17, do not wrongly apply the tests to City Centre proposals. The expansion of paragraph 6.19 to refer to the redevelopment of Bradwells Court (an allocation in the Plan) reflects the possibilities of redevelopment and reorganisation of retailing in the City Centre already mentioned in the paragraph.

6.8.2. The evidence before me is that there is not a need for major new retail development, and this is commented upon in the Structure Plan. There is also a shortage of potential development sites in this centre, where large scale

development opportunities are constrained by the historic nature of the centre. Allied to the need for a succinct Plan, this justifies the Council's approach that a policy setting out the sequential approach, which in any case is fully set out in PPS6, is unnecessary. Thus local circumstances govern the retail section of the Plan. Changing circumstances can be monitored and catered for in future development planning, and I note that the Council intends to carry out a shopping study as part of the preparation of the LDF.

6.8.3. There is not an embargo on development in the City Centre and the Policy has been re-written to emphasise the maintenance and enhancement of the vitality and viability of the City Centre. Given the promotion of centres in national policy and the sub-regional role of Cambridge City Centre, the wording of the Policy should seek both maintenance and enhancement from individual proposals. Developments already committed will maintain the competitiveness of the City Centre. The form of Policy 6/5 will also ensure that any further development is consistent with the role of the City Centre.

6.8.4. The new Policy's concern with the nature and scale of City Centre retail development is supported by the reasoned justification which explains the Structure Plan context, to show why only small scale additions to City Centre floorspace are now required. There is a notional control total of floorspace set by the Structure Plan. Much of this has been taken up by commitments, but some capacity remains for additional floorspace, for example in the form of further development at the Grafton Centre. A minor amendment to paragraphs 6.18 and 6.19 would update the position and make it plain that some scope for further floorspace exists, without repeating the Structure Plan material or relying on figures for commitments which could quickly become out of date. The Structure Plan assists with the definition of "small scale" and repeating that definition would be otiose.

6.8.5. However as PPS6 does not require need to be shown for new development in primary shopping frontages there is no necessity to refer to the Grafton Centre in paragraph 6.19. Unlike at Bradwells Court there is no allocation at the Grafton Centre, and the inclusion of more examples of possible development sites would give an inaccurate impression of the availability of development opportunities in the City Centre.

6.8.6. The Grand Arcade scheme and the permitted extension to the Grafton Centre are important commitments in the City Centre, but the Plan does not show commitments, in order to maintain the clarity of the Proposals Map and Plan strategy. This is a reasonable approach on the part of the Council.

6.8.7. As for the number of eating establishments, this is partly a response to demand in a City with major educational establishments and many visitors. The loss of shops to this, and other, types of use is controlled to an extent by Policies 6/6 and 6/7, but changes of use within Use Classes are not so controlled, and the type of retail trader occupying a particular shop cannot be determined by the Plan.

RECOMMENDATION

6.8.8. I recommend that the RDD be modified as follows;

- a) delete the words "which has been granted planning permission" from the end of paragraph 6.18.**
- b) delete the first sentence of paragraph 6.19 and replace it with "Some of the capacity identified by the Structure Plan is committed, but this leaves scope for further small scale additions of retail floorspace, within the total allowed for in the Structure Plan".**

6.9 POLICY 5/13 (FDD) AND 6/6 (RDD)

Objections

Unilever
Turnstone Estates
Dernford (Regent) Ltd
Tony Waite

32/1/DEP01/05_P13
47/14/DEP01/05_P13
391/12/DEP01/05_P13
785/1/DEP02/06_P06

Summary of Objections

- This is an arbitrary and inflexible policy which hinders the provision of a diversity of uses in the City Centre.
- In secondary frontages changes of use from A1 to A3 should be permitted.

Inspector's Reasoning and Conclusions

6.9.1. As I have seen, the City Centre already contains a diversity of uses, but changes of use from A1 to A2 and A3 uses are permitted by Policy 6/6 subject to specified tests. Policy 6/6 therefore incorporates a degree of flexibility, but the tests against which proposals in primary frontages would be judged do appear to me to be arbitrary, depending as they do on the use of the adjoining unit, or whether or not a large unit is involved. "Large" is not defined, and a high proportion of frontage could conceivably change its use without involving adjacent units. The Council says that the Policy is based on existing Local Plan Policy SH2, but I do not see the above tests set out in that Policy.

6.9.2. The purpose of the tests is not set out. It would assist the understanding and effectiveness of the Policy if it was. The Policy should also reflect the disaggregation of the former Use Class A3 (see Section 6.14).

6.9.3. Objectors suggest a policy based on the individual merits of each case. If the interests underlying those merits, and which the Policy is trying to protect, are specified, I consider that this approach is preferable to that of the RDD. The change of use should be consistent with protecting the vitality and viability of primary frontages in particular, which is of over-riding importance in this City Centre of sub-regional significance.

6.9.4. In relation to secondary frontages, the Council acknowledges the problems inherent in using a test dependent upon the percentage of frontage in A1 use. However, objectors do not put forward alternatives which are preferable. Changes to residential use at ground floor level would create dead frontages and reduce the availability of shops and services. A policy effectively permitting all changes of use in secondary frontages would do nothing to safeguard the shopping function of the substantial areas involved. On the other hand, it seems to me that what is in effect a 40% allowance for non-A1 uses in secondary frontages (except in 2 specified cases) would permit a sufficient degree of diversity of uses whilst retaining A1 uses in a majority and thus protecting the retail function of the secondary area.

RECOMMENDATION

6.9.5. I recommend that the RDD be modified a) by deleting criterion (a) of Policy 6/6 and replacing it with the following:-

"a – in primary shopping frontages where the proposal would not harm the contribution the frontage makes to the vitality and viability of the City Centre: and";

and b) by deleting "A2 or A3" in the first line of Policy 6/6 and replacing it with "A2, A3, A4 or A5".

6.10 POLICY 5/14 AND PARAGRAPH 5.36 (FDD), POLICY 6/7 (RDD)

Objections

British Land Universal	30/3/DEP01/05_P14
Turnstone Estates	47/15/DEP01/05_P14
BT Plc	376/13/DEP01/05_P14
Dernford (Regent) Ltd	391/13/DEP01/05_P14
Bidwells Property Consultants	396/46/DEP01/05_P14
WM Morrison Supermarkets Plc	406/2/DEP01/05_P14
	406/8/DEP01/05_36
	406/3/DEP02/06_P07
Cambridge Ethnic Community Forum	765/1/DEP02/06_P07
Ismaeel Malik	769/1/DEP02/06_P07
Tony Waite	785/2/DEP02/06_P07

Summary of Objections

- The Policy is restrictive. A criteria-based retail policy and a requirement for need analysis should form part of the Plan.
- There is an arbitrary limit on the proportion of non-A1 uses allowable in district and local centres. The limit should be removed or made more flexible, especially in respect of A3 uses.
- The Beehive Centre should be classed as a district centre.

Inspector's Reasoning and Conclusions

6.10.1. Policy 6/7 is permissive of shopping development which serves the local community. This reflects the role of district and local centres. Need analysis and the local circumstances which affect retail policies in Cambridge are discussed above under Policy 6/5. I do not see there being a requirement for a need/criteria based policy regarding district and local centres. The scale of development should relate to the role and function of the centre: this should not be qualified in the absence of evidence that these types of centre are losing ground against other centres.

6.10.2. My conclusions above regarding changes of use in secondary frontages, again under Policy 6/5, are relevant to a consideration of similar types of proposal in district and local centres. While providing for a diversity of uses, the shopping role of centres should be protected so that the day to day needs of local people to buy goods can be met locally. In the case of these centres, the Council has carried out a survey to determine the appropriate level at which further changes of use would not be permitted. The Council considers that the proportion reflects the overall level of service provided by the centres. The Council has chosen a method of measurement, by number of units, which can be used efficiently. The Policy does permit changes of use up to the 60% limit, still enabling shop units to reinforce each other, but too wide a loss of Class A1 shops to Class A3, A4 or A5 uses would reduce the ability of centres to compete with out of centre shops, and could cause amenity problems. I do not comment on individual proposals for A3 use. But the

Policy should reflect the disaggregation of the former Use Class A3 (see Section 6.14).

6.10.3. The Beehive Centre is an out of centre group of stores including several retail warehouses and serving car-borne customers. PPS6 says that local planning authorities should not regard out of centre developments as centres.

RECOMMENDATION

6.10.4. I recommend that the RDD be modified by deleting from Policy 6/7 "A2 and A3" in the first paragraph and replacing it with "A2, A3, A4 and A5" and by deleting "A2 or A3" in the second paragraph and replacing it with "A2, A3, A4 or A5".

6.11 POLICY 5/15 AND PARAGRAPH 5.37 (FDD), POLICY 6/8 (RDD)

Objections

Marks and Spencer Plc	367/4/DEP01/05_P15
Tesco Stores Ltd	372/4/DEP01/05_P15
BT Plc	376/14/DEP01/05_P15
WM Morrison Supermarkets Plc	406/3/DEP01/05_P15
	406/9/DEP01/05_37
Mr. S. P. Conrad	441/1/DEP01/05_P15
Sainsbury's Supermarkets Ltd	686/2/DEP01/05_P15
	686/1/DEP01/05_37
Sohnius And Perry Ltd	784/5/DEP02/06_P08

Summary of Objections

- Further retail development would be acceptable if need is established and the sequential approach applied. The Plan should allow for this in a criteria based policy. Need does not have to be shown in centres.
- Policies are inadequate to protect daily needs shopping.
- Small convenience shops should be encouraged in residential areas.

Inspector's Reasoning and Conclusions

6.11.1. Criterion (a) in the Policy is designed not to establish a test of need in centres but to ensure that developments are of a scale which would be compatible with existing centres in environmental and traffic terms. Therefore paragraph 6.26 (formerly 5.37 in the FDD) should refer to the environmental and traffic problems associated with large shops. The first sentence of the paragraph at present refers only to need.

6.11.2. Otherwise the points made above under Policy 6/5 are relevant (see paragraph 6.8.2). Even with proposed housing provision, the Hillier Parker retail study anticipated an over-supply of out of centre floorspace, given the amount of recent retail development. Tesco point to increases in expenditure since the shopping study was prepared in 2001, but I note that the Council intends to carry out a shopping study as part of the preparation of the LDF.

6.11.3. The RDD contains a definition of minor extensions (criterion (b)).

6.11.4. It is not possible for a policy to specify daily needs shopping, or some such detailed term. Changes of use between shops are permitted by the Use Classes Order. However a satisfactory degree of protection is given to shops in centres by

other policies of the Plan.

6.11.5. The City contains a network of local and other centres which include small convenience shops. I am satisfied that the Council has properly identified centres. About 92% of the properties in the City are within 750m of a centre (a distance used by the objector) and about 66% are within 500m. In addition there are individual shops outside centres, and new provision will accompany some of the development in Areas of Major Change. In my opinion there is a good coverage of local shops, and the Council has complied with national guidance to investigate whether there are deficiencies in provision.

6.11.6. Individual small shops struggle to survive, and the best locations for meeting local needs are in local centres, where services are able to support each other and maximise accessibility to their catchment areas. A more permissive policy towards shops outside centres could lead to the development of small high turnover shops which could harm local centres. As it stands, the Plan does permit new convenience retailing in some circumstances.

RECOMMENDATION

6.11.7. I recommend that the RDD be modified by the deletion of the first sentence of paragraph 6.26, and its replacement by the following:-

“There is no further need for major convenience goods net floorspace in Cambridge until 2016. In existing centres, smaller shops are allowed as set out in Policy 6/8. Larger shops would be likely to cause environmental and traffic problems, bearing in mind the character of the City Centre and other centres.”

6.12 POLICY 5/16 (FDD)

Objections

The objections to this aspect of the plan are listed in Annex 3.

Pre-Inquiry Change: CCC303

Summary of Objections

- The Policy is restrictive and inflexible. New retail warehousing development could be allowed if it met the test of need and other national policy tests.
- Existing sites with established retail warehouses should be designated on the Proposals Map and given policy protection and encouragement for investment.
- Newmarket Road and urban extensions would, or could, be suitable for retail warehousing.
- Amendments and additions to the Policy are proposed.

Inspector's Reasoning and Conclusions

6.12.1. The Hillier Parker retail study, prepared for the Structure Plan well after the adoption of the existing Cambridge Local Plan, considered that retail warehouses in Cambridge are under-performing. There was no capacity for additional retail warehousing floorspace. An over-supply of retail warehousing throughout the Structure Plan period was predicted as a result of the development of the Cambridge Retail Park. In this situation of an absence of need the form of Policy

6/9 should not be changed, and I do not support the designation or allocation of sites for retail warehousing development. Applications for consolidation and modernisation of floorspace at Cambridge Retail Park can be assessed on the basis of Policy 6/9 and other material considerations. Where redevelopment on existing sites is concerned, there seems to be no need to increase floorspace. I do not see the possible environmental improvements, from further retail warehouse development on Newmarket Road, as justifying additional shopping at this out of centre location.

6.12.2. As far as more minor objections are concerned, residential development of retail warehousing can be judged against other Plan policies and material considerations without having a specific policy to permit it.

RECOMMENDATION

6.12.3. I recommend no modification to the RDD.

6.13 PARAGRAPH 5.38 (FDD)

Objections

Bidwells Property Consultants

396/47/DEP01/05_38

Summary of Objections

- There is no over-supply of retail warehousing.

Inspector's Reasoning and Conclusions

6.13.1. As stated above, a major retail study has found there to be an over-supply. I prefer this evidence to the suggestion that there is continuing strong demand: demand from operators does not necessarily signify that there is a need. Should circumstances change Policy 6/9 can be reviewed.

RECOMMENDATION

6.13.2. I recommend no modification to the RDD.

6.14 POLICY 5/17 (FDD), POLICY 6/10 AND PARAGRAPH 6.28 (RDD)

Objections

The Green Party
 Transport 2000 Cambridgeshire & West Suffolk
 Bidwells Property Consultants
 Miss G. M. Owst
 Whiteley & Creasey (Anglia) Limited
 Sohnius And Perry Ltd

229/3/DEP01/05_P17
 374/7/DEP01/05_P17
 396/48/DEP01/05_P17
 537/3/DEP01/05_P17
 699/4/DEP01/05_P17
 784/4/DEP02/06_P10
 784/7/DEP02/06_28

Summary of Objections

- The Policy is too restrictive. A3 uses are acceptable in areas such as the Retail Park.

- Take-away food outlets should be encouraged in the central area.
- The Policy contains too few restrictions. There are too many A3 uses.
- Small restaurants should be encouraged in residential areas, away from centres.

Inspector's Reasoning and Conclusions

6.14.1. The former Use Class A3 has been disaggregated into Classes A3 (restaurants and cafes), A4 (drinking establishments) and A5 (hot food take-aways). PPS6 identifies restaurants, bars and pubs as being amongst the main town centre uses, and Circular 03/2005 identifies all of the Part A uses as uses which will generally be found in shopping areas. Policy 6/10 is therefore correct to seek to confine such uses to centres, amongst other specified and limited types of area. In centres they can contribute to the vitality and viability of the centres and benefit from the accessibility, and therefore sustainability, advantages of the centres. Cambridge Retail Park is an out of centre shopping area and the Policy should not be relaxed in order to encourage out of centre proposals.

6.14.2. On the other hand these uses help to make centres diverse and attractive to visitors. They should be permitted in centres, and the Policy does already have this effect. There are many outlets in the centre, and some near the bus station. The balance of food and drink uses compared with shops is however controlled by other Plan policies. There is not therefore a 'free for all', but too permissive a policy in the City Centre could harm City Centre retailing, amenity and character. The environmental impact of uses, even in centres, is controlled by clause (a) of the Policy and further restrictions are not needed.

6.14.3. With regard to the objection suggesting the opening of small restaurants in residential areas, my conclusions above concerning a similar objection favouring small convenience shops in such areas are relevant, and reference should be made to those conclusions (paragraphs 6.11.5 and 6.11.6). There is the additional consideration of amenity problems for residents. These can be controlled but the avoidance of such problems would constrain the number of possible sites and the viability of individual uses. This is another reason for not changing the Plan. The appearance of widening the choice of locations might in practical terms result in very few new outlets.

6.14.4. However the Policy should be amended to reflect the disaggregation of the former Use Class A3.

RECOMMENDATION

6.14.5. I recommend that the RDD be modified by deleting the words "Use Class A3" in the first lines of Policy 6/10 and paragraph 6.28 and replacing them with "Use Classes A3, A4 and A5".

6.15 PARAGRAPH 6.29

Objections

Jonathan Larmour

776/6/DEP02/06_29

Summary of Objections

- There may need to be restrictions on delivery timing and locations for unloading at food and drink outlets.

Inspector's Reasoning and Conclusions

6.15.1. This paragraph merely gives examples of some of the conditions which might be imposed in permissions for food and drink outlets. Policy 8/9 deals with access and parking for service and delivery vehicles.

RECOMMENDATION

6.15.2. I recommend no modification to the RDD.

6.16 OMISSION SITE 16 – SITE 11.6 IN THE 1996 LOCAL PLAN, NEWMARKET ROAD

Objections

Whiteley and Creasey (Anglia) Limited
Cambridge Preservation Society
Transport 2000 Cambridgeshire & West Suffolk

699/1/DEP01/PM/O16
26/17/DEP03/O16
374/5/DEP03/O16

Summary of Objections

- The RDD fails to allocate any sites for retail warehousing. This land is so allocated in the existing Local Plan. Its continued allocation is needed so as to encourage investment and linked shopping trips.

Inspector's Reasoning and Conclusions

6.16.1. I deal with the question of retail warehousing above. As a result of my conclusions there, the objection site should not be allocated.

RECOMMENDATION

6.16.2. I recommend no modification to the RDD.

7. WORKING & STUDYING IN CAMBRIDGE

7.1 WHOLE CHAPTER

Objection

New Hall	42/1/DEP01/06
	42/2/DEP01/06
The Perse School	395/1/DEP01/06
	395/4/DEP01/06
Gonville & Caius	398/2/DEP01/06

Summary of Objections

- There should be a separate chapter on Colleges, or all the education-related policies should be grouped together.
- The needs of Colleges as non-commercial organisations should be recognised.
- Policies should facilitate the continued functioning and well-being of educational establishments.
- The Plan should explain the difference between Higher and Further Education.
- The Plan should support future expansion of the University and the Colleges.

Inspector's Reasoning and Conclusions

7.1.1. As I have indicated in Chapter 2, there is logic in the Council's approach of linking higher and further education with working in Cambridge. It does not mean that the separate identities and needs of the Colleges are not recognised or that they are regarded in the same way as commercial organisations. It also assists in reducing the length of the Plan. I am not satisfied that there would be any significant benefit in grouping education-related policies together, given that schools largely serve the local community, whereas higher and further education serve a far wider catchment as well as playing a significant role in the local economy. Nothing in the objections persuades me that there is anything unsound in the Council's approach. I deal in Chapter 11 of this report with objections to the car parking standards.

7.1.2. The distinction between higher and further education does not appear to be of great relevance to the way in which development proposals would be considered. For this reason there is no need for the Plan to explain the difference between the two types of education.

7.1.3. Policy 7/4 deals with the promotion of cluster development and reflects the important role of the University and Colleges in their establishment. The Plan also makes provision for faculty development in the central area and for higher education and associated research facilities on land between Madingley Road and Huntingdon Road. Other policies of the Plan provide an adequate framework within which any other proposals for University, College-related or other educational development can be considered on their own merits. In these circumstances there is no need for a separate policy relating to the further expansion of the University and the Colleges. Nor has a case been made for including a general policy of support for educational establishments.

RECOMMENDATION

7.1.4. I recommend no modification to the RDD.

7.2 OBJECTIVE 1

Objections

Cambridge Preservation Society

26/31/DEP01/06_OBS

Summary of Objections

- The relocation of non-conforming uses should be an objective.

Inspector's Reasoning and Conclusions

7.2.1. There is no evidence before the inquiry of a problem of non-conforming uses in the Plan area that needs to be addressed specifically, and indeed there are no policies in the Plan on this matter. It would not, therefore, be appropriate to make the relocation of non-conforming uses an objective of the Plan.

RECOMMENDATION

7.2.2. I recommend no modification to the RDD.

7.3 OBJECTIVE 3

Objections

Cambridge Preservation Society
St John's College

26/30/DEP01/06_OB3
81/9/DEP01/06_OB3

Summary of Objections

- Objective 3 should provide for the *enabling* of Cambridge's role.
- Objective 3 should also refer to innovation.

Inspector's Reasoning and Conclusions

7.3.1. Objective 3 of the RDD now refers to enabling and innovation.

RECOMMENDATION

7.3.2. I recommend no modification to the RDD.

7.4 PARAGRAPH 6.1 (FDD) AND PARAGRAPH 7.1 (RDD)

Objections

The Bursars' Committee of the Cambridge Colleges
Cambridgeshire County Council

87/18/DEP01/06_01
55/33/DEP02/07_01

Summary of Objections

- Higher and Further Education should be the subject of a separate chapter and more detailed consideration.

- The Plan should refer to the fact that employment sites straddle the boundary with South Cambridgeshire, and to the numbers of high-tech jobs.

Inspector's Reasoning and Conclusions

7.4.1. I have dealt with the thrust of the objection by the Bursars' Committee in Chapter 2.

7.4.2. The Areas of Major Change are dealt with in Chapter 9 of the Plan, which also acknowledges that some of the sites are partly situated in South Cambridgeshire. I am not satisfied that any further reference in this Chapter to either existing or proposed sites that straddle the City boundary would add significantly to the understanding of the Plan's policies.

7.4.3. Statistics on the numbers employed in various sectors, which are available in regular monitoring reports, become out-of-date relatively rapidly, and for this reason I do not support their inclusion in the Plan.

RECOMMENDATION

7.4.4. I recommend no modification to the RDD.

7.5 POLICY 6/1 (FDD)

Objections

St John's College
Arlington Securities Plc
Network Rail
Land Securities Properties Limited
Addenbrooke's NHS Trust

81/6/DEP01/06_P01
369/1/DEP01/06_P01
370/34/DEP01/06_P01
371/7/DEP01/06_P01
399/15/DEP01/06_P01

Summary of Objections

- The omission site being promoted by St. John's College should be referred to.
- The Policy is not robust enough to ensure the delivery of sufficient employment land, and further strategic employment allocations should be identified.
- The Policy should state that employment development will be acceptable within urban extensions and action areas.
- Bradwell's Court should not be allocated for employment.
- Table 6.1 in the FDD should be in the supporting text, not the Policy.

Inspector's Reasoning and Conclusions

7.5.1. The Structure Plan estimates that the amount of employment land that will be taken up during the Plan period is 56 hectares, although this assumes a substantial increase in annual take-up during the Plan period when compared with the average completion rate over the 10 years up to 2002. Of the 56 hectares shown as being provided for in Table 7.2 of the Plan, 10 hectares is at East Cambridge. Development at East Cambridge is dependent on the relocation of the Airport, and the timescale for that is unclear. In allocating sites to meet the area's housing requirement to 2016, no reliance is placed on any dwelling coming forward at East Cambridge. In the light of this, there is considerable uncertainty as to whether any employment land will be forthcoming from this location before 2016.

7.5.2. The criticism that the Policy does not ensure that development will be delivered in the Plan period therefore has some justification. But it is not practical

to delay adoption of the Plan whilst additional suitable employment land is identified. Instead, therefore, it will be necessary for the Council to carry out close monitoring of the supply of employment land and if necessary consider the need to bring forward in its Development Plan Documents either other sites or another mechanism for meeting any likely shortfall, as required by Structure Plan Policy P1/4.

7.5.3. The policies in Chapter 9 of the RDD make specific provision for employment development within urban extensions.

7.5.4. In the RDD, Bradwell's Court (Site 6.02) is no longer allocated for employment development, and a specific reference to the Bradwell's Court Planning Brief is included in the Plan.

7.5.5. Employment land take up is set out in Table 7.1 in the RDD, formerly Table 6.1 in the FDD. It is clear from the layout of the Plan that this Table is not part of the Policy.

7.5.6. In view of my conclusion in Section 7.29 below, it is not appropriate to refer to the omission site being promoted by St. John's College.

RECOMMENDATION

7.5.7. I recommend no modification to the RDD.

7.6 TABLE 6.2 (FDD) AND TABLE 7.2 (RDD)

Objections

Countryside Properties	68/13/DEP01/06_T02
St John's College	81/8/DEP01/06_T02
Turnstone Estates	47/2/DEP02/07_T02
Cambridgeshire County Council	55/34/DEP02/07_T02
South Cambridgeshire District Council	461/10/DEP02/07_T02

Pre-Inquiry Changes: SC7.007 and CCC305

Summary of Objections

- The Table should indicate safeguarded land for employment, and the Proposals Map should identify areas of land to be safeguarded post-2016.
- Table 6.2 (Table 7.2 in the RDD) should refer to the omission site being promoted by St. John's College.
- The Northern Fringe employment allocation should be at least 5 hectares.
- The footnote should state that the level of employment provision for Cambridge East is uncertain. There should be a reference to the proposed joint Area Action Plan (AAP) with South Cambridgeshire.
- More should be said on the amount of employment land proposed in Cambridge East as a whole. Provision should be expressed in terms of jobs not land area.

Inspector's Reasoning and Conclusions

7.6.1. The Plan does not propose any specific safeguarding of land for future employment development post-2016 other than the land to the south of Addenbrooke's (Site 9.10), and it would therefore be inappropriate to make any reference to safeguarding either in Table 7.2 or on the Proposals Map.

7.6.2. The Northern Fringe development will play a significant role in meeting the City's housing requirement and in meeting the target set by the Structure Plan for housing development on previously developed land. For these reasons I consider that the Council's view of the development as being housing-led is sound. If the size of the employment allocation is increased, that is likely to be at the expense of the housing allocation. I have noted above the uncertainty surrounding the timing of the Cambridge East development and the need for frequent monitoring of the employment land supply position, and it may be appropriate for the Council to reconsider the precise allocation of land uses in this area when the master planning process is further advanced. However, in view of the identified need to improve the imbalance between housing and employment in the Sub-Region it is not a change that I support at this stage.

7.6.3. The Pre-Inquiry Change SC7.007 to the footnotes to Table 7.2 would add further explanation of the proposals for the whole of the East Cambridge area including that part situated in South Cambridgeshire District. This would address Objection 55/34/DEP02/07_T02 and part of Objection 461/10/DEP02/07_T02. But I am not satisfied that it is necessary to refer to jobs rather than land area. The Structure Plan expresses estimated employment land take-up in terms of land area and one of the functions of Table 7.2 is to demonstrate how that requirement is to be met both through existing planning permissions as well as through allocations. It would be unnecessarily confusing to use two separate measures in the same Table, and it is more important to have consistency within the Plan than consistency between one part of Table 7.2 and the proposed AAP for East Cambridge.

7.6.4. In view of my conclusion in Section 7.29 below, it is not appropriate to refer to the omission site being promoted by St. John's College.

7.6.5. Pre-inquiry change CCC305 proposes a change to delete the quantum of employment land shown in Table 7.2 for the Station Area, and I support this in order to introduce consistency between the Table and Footnote 5.

RECOMMENDATION

7.6.6. I recommend that the RDD be modified by the incorporation of SC7.007 and CCC305.

7.7 PARAGRAPH 6.7 (FDD) AND PARAGRAPH 7.7 (RDD)

Objections

Cambridgeshire County Council
Cllr John Durrant

55/35/DEP01/06_07
838/3/DEP02/07_07

Summary of Objections

- It is questioned whether carried-forward employment allocations have been reviewed in the light of Structure Plan requirements.
- The word "clear" should be deleted from the final sentence of paragraph 7.7.

Inspector's Reasoning and Conclusions

7.7.1. There is no evidence that the outstanding employment allocations from the adopted Local Plan (now referred to in paragraph 7.8 of the RDD and in Table 7.2) are not suitable for employment development or are not likely to come forward during the Plan period. The Council will need to keep the situation under

review, and may need to consider taking action to bring the sites forward for development at some future date, but there are no grounds now for removing the allocations from the Plan.

7.7.2. The requirement in paragraph 7.7 of the RDD, for the University to show a clear need for the land between Madingley Road and Huntingdon Road before it can be brought forward for development, repeats the wording of Structure Plan Policy P9/2c.

RECOMMENDATION

7.7.3. I recommend no modification to the RDD.

7.8 PARAGRAPH 6.8 (FDD)

Objections

Addenbrooke's NHS Trust

399/20/DEP01/06_08

Summary of Objections

- The issue of safeguarding land for development post-2016 should be dealt with. Table 2 should be cross-referenced to Para 6.8 and should cover safeguarded land.

Inspector's Reasoning and Conclusions

7.8.1. The RDD now safeguards land south of Addenbrooke's (Site 9.10) for future clinical development after 2016. Further details are given in Chapter 9 of the RDD. There is also the possibility that some land allocated for employment during the Plan period in North West Cambridge may come forward after 2016. There is no need to make further reference to the issue of safeguarding in this part of the Plan.

RECOMMENDATION

7.8.2. I recommend no modification to the RDD.

7.9 PARAGRAPH 7.9

Objections

Turnstone Estates

47/3/DEP02/07_09

Summary of Objections

- Further employment allocations are required to ensure that the Structure Plan figure for new employment development is achieved on a net increase basis.

Inspector's Reasoning and Conclusions

7.9.1. The figures in Table 7.2 are gross. Paragraph 7.9 of the supporting text acknowledges that there are likely to be losses of employment land, and indicates that the situation will be monitored and kept under review. Neither the Council nor the Objector has tried to quantify the extent of the likely loss of employment land, which I agree is difficult to predict. Bearing that in mind, and given that an over-allocation of employment land would not further the Structure Plan objective of

restoring the balance between jobs and housing, I support the Council's approach of not allocating additional employment land at this stage.

RECOMMENDATION

7.9.2. I recommend no modification to the RDD.

7.10 POLICY 6/2 (FDD) AND POLICY 7/2 (RDD)

Objections

The objections to this aspect of the Plan are listed in Annex 3.

Summary of Objections

- The Policy should allow employment development in many more situations.
- Only office style employment for regional government agencies and public bodies with a proven need to be located in Cambridge should be allowed.
- The Citizens Advice Bureau and schools should be regarded as essential services. The word "new" should be inserted before "employment development proposals", and the use of the word "firms" is inappropriate.
- Subparagraph (b) should include Addenbrooke's campus. The footnote should also refer to the Medical Research Council, Addenbrooke's, the University and other related research occupiers.
- Pre-commercial University research development, and ancillary uses, should be allowed.
- Employment development should be acceptable within urban extensions and action areas. There should be a further proposal for a new technology and research park.
- The Policy should not apply to small sites or sites already in employment use. It should provide for the relocation of firms which have been established in Cambridge for at least two years. It should protect existing sites employing skilled/semi/unskilled manual workers.
- Objections are made to the requirement for new employment development to contribute towards affordable housing. The reference is unnecessary as it duplicates policy provision elsewhere in the RDD.

Inspector's Reasoning and Conclusions

7.10.1. The principle of a policy for the selective management of employment development within the Plan area is of long standing. It accords with Policy 26 of RPG 6 and with Policy P9/7 of the Structure Plan. The categories of employment development that would be permitted under the Policy are not significantly different from those in Policy ET2 of the adopted Plan, and broadly follow Structure Plan Policy P9/7. There is no evidence that the adopted Policy has not worked well in practice, or to justify a widening of the permitted categories. It is unnecessary to insert "New" before "employment development proposals" in the first line of the Policy, as it will clearly only apply to proposals requiring planning permission.

7.10.2. The equivalent policy in the adopted Plan applies to all employment sites regardless of size and regardless of the existing use, and there is no evidence before the inquiry that this has had a harmful effect on the local economy. In view of the strategic policy background, I find no justification for recommending a

change to the Policy in this regard.

7.10.3. The last part of sub-paragraph (a) of the Policy, relating to developments within Use Class B1(a), which would exceptionally allow development with a proven need for a regional function, goes somewhat further than Structure Plan Policy P9/7(c), but reflects and is consistent with that Policy's supporting text. In principle, I see no reason why a Local Plan policy should not incorporate guidance that appears in the Structure Plan supporting text, given the Local Plan's function of interpreting the Structure Plan in the local context. The RDD contains in paragraph 7.14 more explanation on the last part of sub-paragraph (a). In my view this gives sufficient guidance as to how that part of the Policy might operate. The Structure Plan does not restrict the exception to government or public bodies, and given the exceptional nature of the category, it would be difficult to give any more guidance as to the types of uses that might be acceptable. I do not therefore support any modification of the supporting text in this regard.

7.10.4. I agree with the Council that the footnote to sub-paragraph (a) should give a general definition of "essential service" rather than naming specific bodies. It is therefore unnecessary to include a specific reference to the Citizens Advice Bureau, although the Council's view is that the CAB is likely to be classified as an essential sub-regional service in any event. In the RDD paragraph 7.13 clarifies that sub-paragraph (d) of the Policy applies to further and higher educational uses, not to schools. It is clear that the Council does not intend the Policy to exclude pre-commercial research, and in my view this activity would be one that could be permitted under the terms of the Policy. There is therefore no need to include an explicit reference to this in the Policy.

7.10.5. The restriction in sub-paragraph (b) to Use Class B1(b) is carried forward from the adopted Plan, and is consistent with Structure Plan Policy P9/7. There is no convincing evidence before the inquiry to justify its removal. I do not support a specific reference in this sub-paragraph to Addenbrooke's; the Policy relates to the whole of the Plan area, but it is implicit within the sub-paragraph that a special need to be located close to Addenbrooke's would satisfy the Policy. The absence of a reference here to Addenbrooke's does not in any way undermine the significance of development in the Addenbrooke's area, as there are several references elsewhere in the RDD which adequately reflect the importance of the biotechnology and biomedical cluster in this area.

7.10.6. There is no reason why ancillary uses could not be included in a development if the case could be made out for them, but I agree with the Council that to make reference to them in the Policy would overly complicate it. In the RDD, Footnote 5 now makes reference specifically to the Medical Research Council and Addenbrooke's Hospital, as well as the Universities. Any further changes to the definition of research institutes in Footnote 5 would be likely to widen it to an extent that could undermine the aims of the Policy.

7.10.7. An exception is made for established firms, both in the Policy itself and in Policy 5/1. The use of the word "firms" in the penultimate paragraph of the Policy does appear inappropriate as the Policy clearly applies to a wider range of organisations than that word might imply. I recommend that it is changed to "bodies". Although the definition of "established" in the RDD is changed from that in the adopted Plan, I agree with the Council that the requirement for five years in Cambridge is a more appropriate test that a body has become truly established.

7.10.8. Policy 7/3 protects existing industrial and storage space on identified sites, and elsewhere unless certain criteria are met. The objective of this Policy is to preserve the diversity of employment opportunities, and in my view it goes as far as is reasonable in seeking to maintain some balance in the economy. To

provide complete protection from redevelopment to sites currently employing skilled/semi/unskilled manual workers and those not connected with education and research, would be unduly restrictive.

7.10.9. It is unnecessary to refer in the Policy to the acceptability of employment development within urban extensions and action areas as specific provision for employment development in these areas is made in Chapter 9 of the Plan.

7.10.10. I deal with the objection by Arlington Securities in Section 7.5 above.

7.10.11. Objections relating to the contributions of employment developments towards affordable housing are dealt with in Chapter 5. As I have indicated there, some of the issues raised in objections to this aspect of the Policy are more appropriately addressed in the Council's proposed SPD than in Policy 5/6. It should be noted that only development likely to have an impact on demand for affordable housing would be required under that Policy to make some provision for affordable housing. I have also commented there on the question of the impact of the Policy requirements on the viability of developments. Whether or not the provision by the University of key worker housing on its land should remove the need for University-associated Research Establishments and Institutes to make such provision would have to be determined on a case by case basis. In making such determinations the Council will need to bear in mind the advice in Circular 5/2005 "Planning Obligations" on the issue of viability.

7.10.12. However, Policy 5/6 will apply to new employment development whether it is referred to here or not. There is no particular need for the cross-reference to that Policy, when there are no similar cross-references to the other policies that would apply to development proposals, and it should therefore be deleted.

RECOMMENDATION

7.10.13. I recommend that the RDD be modified as follows:

- a) **In the second paragraph of Policy 7/2 delete "firms" and insert "bodies".**
- b) **Delete the final paragraph of the Policy.**

7.11 PARAGRAPHS 6.11 AND 6.12 (FDD)

Objections

The Perse School

395/3/DEP01/06_11
395/6/DEP01/06_12

Summary of Objections

- Are new educational uses to be directed only to employment land?

Inspector's Reasoning and Conclusions

7.11.1. Paragraph 7.13 of the RDD (formerly paragraph 6.12) now includes the clarification that Policy 7/2 applies only to further and higher educational uses within Use Class D1, and not to schools.

RECOMMENDATION

7.11.2. I recommend no modification to the RDD.

7.12 PARAGRAPHS 7.12 AND 7.15**Objections**

Dr. Peter G.I. Stovin

287/6/DEP02/07_12
287/2/DEP02/07_15**Summary of Objections**

- There should be employment opportunities for people of all grades of ability.

Inspector's Reasoning and Conclusions

7.12.1. There is currently an imbalance between jobs and housing in Cambridge, and the Structure Plan has sought to address that through the provision of a significant number of new homes as well as through the selective management of the economy. The approach in the Local Plan is derived from policies in RPG 6 and in the Structure Plan with which the Local Plan must conform. Other policies of the Plan would allow industrial development in addition to those categories permitted under Policy 7/2a and b, but only on a small-scale. I support this approach as any larger-scale manufacturing would be inappropriate given the limited amount of employment land. Some encouragement is also given to tourism in the Plan, but on the basis of managing rather than promoting it. All these provisions will provide some diversification of employment.

7.12.2. The Council has acknowledged the need to address the employment implications of the development of Cambridge Airport and the relocation of Marshalls at the appropriate time as part of its economic development strategy, but in the meantime the identification of the Airport as an Area of Major Change accords with Structure Plan requirements.

RECOMMENDATION**7.12.3. I recommend no modification to the RDD.****7.13 PARAGRAPH 7.14****Objections**

South Cambridgeshire District Council

461/12/DEP02/07_14

Summary of Objections

- The exception for regional facilities should be limited to regional government agencies and public bodies that need to be located in Cambridge.

Inspector's Reasoning and Conclusions

7.13.1. I deal with the thrust of this objection in Section 7.10 above.

RECOMMENDATION**7.13.2. I recommend no modification to the RDD.****7.14 POLICY 6/3 AND PARAGRAPH 6.18 (FDD), POLICY 7/3 (RDD)**

Objections

Land Securities	37/2/DEP01/06_P03
Network Rail	370/36/DEP01/06_P03
Bidwells Property Consultants	396/49/DEP01/06_P03
	396/55/DEP01/06_18
The Marshall Group of Companies	66/3/DEP02/07_P03
Cambridge Community Church Trust	783/1/DEP02/07_P03

Pre-Inquiry Changes: SCDS.001 and SCPM.007

Summary of Objections

- The first sentence and the list of protected industrial sites in the Designations Schedule should be deleted.
- This Policy should not apply within the Action Area proposals sites, where appropriate levels of employment should be determined by the Action Plan.
- The criteria for designation are not clear.
- The Quorum at Barnwell Road should not be included as a designated site.

Inspector's Reasoning and Conclusions

7.14.1. The City does not have a significant amount of industrial floorspace. In order to complement the Policy for selective management of the economy, it is important that the Plan seeks to prevent the range of job opportunities and services in the Plan area being restricted and the employment sector becoming unduly unbalanced, by protecting existing industrial sites from pressures for development for other uses. The Policy is more restrictive than Policy ET5 of the adopted Local Plan. But the Policy approach of identifying a core of industrial sites which should be protected from changes of use is justified by the small amount of industrial land in the City, the redevelopment pressures in the area and the fact that the adopted Policy has not been effective in preventing the loss of industrial land. In view of these circumstances I am not persuaded that the Plan approach is unreasonable or unduly inflexible.

7.14.2. The Industrial Land Review commissioned by the Council reviewed existing industrial floorspace in Cambridge and allocated scores to sites on the basis of such matters as size, age and access. Of the 31 sites analysed, 10 with the higher scores have been designated, indicating a measured approach of selecting only the best sites for greater protection. The Coldhams Lane Business Park, the subject of one objection, is a recent site that scored particularly highly by comparison with other sites, and therefore deserves protection. The uses that would be permitted under the Policy are sufficiently wide to allow a range of alternative uses if existing users wished to vacate the premises.

7.14.3. The Council will need to monitor the situation to ensure that the sites currently designated continue to warrant that protection, but at this stage there is no substantial evidence to warrant removing any of the sites from the Designations Schedule.

7.14.4. Sites in need of physical improvement, even protected sites, would not be precluded from redevelopment as long as the uses remained within those specified in the Policy. There is no justification for removing existing sites within Areas of Major Change from the protection of the second part of the Policy. Criterion (e) would allow redevelopment if mixed use or housing would be more appropriate, and development in these areas will in any event be subject to further guidance to be produced under Policy 9/1.

7.14.5. The Council has agreed that it is inappropriate to include The Quorum within the protected designation because it is not used for one of the protected uses, and proposes changes to the Designations Schedule and the Proposals Map accordingly (SC DS.001 and SC PM.007).

RECOMMENDATION

7.14.6. I recommend that the RDD be modified by the incorporation of SC DS.001 and SC PM.007.

7.15 POLICY 6/4 (FDD) AND POLICY 7/4 (RDD)

Objections to Policy 6/4

The objections to this aspect of the Plan are listed in Annex 3.

Objections to Policy 7/4

Addenbrooke's NHS Trust
Countryside Properties/Liberty Property Trust

399/16/DEP02/07_P04
837/10/DEP02/07_P04

Pre-Inquiry Changes: SC7.001

Summary of Objections

- Clear supporting evidence of a need for a Cambridge location should be a requirement. The Policy should apply to alterations and extensions, and should refer to innovation, and to biomedical research and development.
- The Policy should apply to non-animal research facilities only. The Plan should include a proposal to encourage non-animal research laboratories.
- Employment clusters should develop travel plans to minimise car commuting.
- The Policy should refer to "land south and west of Addenbrooke's Hospital for health care, teaching and research".
- Commercial research facilities and other supportive services should be allowed.

Inspector's Reasoning and Conclusions

7.15.1. Structure Plan Policy P9/7 requires employment land in and close to Cambridge to be reserved for development which can demonstrate a clear need to be located in the area in order to serve local requirements or contribute to the continuing success of the Sub-Region as a centre of high technology and research. I find Policy 7/4 somewhat ambiguous in its reference to the need for a Cambridge location in the second paragraph, and it would be clearer if the requirement to demonstrate a need for a Cambridge location was stated in the first sentence. I recommend an appropriate modification.

7.15.2. The Policy applies to "development", which would include both new development and alterations and extensions to existing development. It now refers to the need to foster innovation. It also includes references to biomedical activities. These references address the substance of the objection by the Medical Research Council, and I consider that no further modification is necessary in respect of that objection.

7.15.3. Some objections have expressed concerns as to the possibility that activities permitted under this Policy might include experiments on animals.

However, the Local Plan is limited to considering the land use planning implications of development. If an activity is acceptable in land use planning terms, then provided it is lawful, the ethical implications of the activity are unlikely to be relevant. What would be permitted under the Policy falls within the framework of Structure Plan Policy P9/7, and objections that the wording is too vague are not, in my view, justified. I do not support the proposal by one objector for the Plan to promote non-animal research facilities. Such facilities would not be ruled out by the Policy, but it is for those who sponsor research rather than for the Council to decide what precise type of facilities might be needed.

7.15.4. Policies 8/2 and 8/3 of the RDD require the transport impact of development to be assessed, and mitigating measures are required where development places demand on the transport system. Staff travel plans are required for non-residential developments. A travel plan could be required from the developer of a business park or other cluster development situated in one discrete location. But in the case of more geographically dispersed clusters, such as the computer software and telecommunications cluster spread across much of the sub-region, the responsibility for providing a travel plan must, from a practical point of view, rest with the individual firm. I agree with the Council that the Plan is sufficiently clear in this respect, and I do not recommend any modification.

7.15.5. Policy 7/4 now refers to "land west of Addenbrooke's Hospital for healthcare biomedical and biotechnology activities". In addition, the Council proposes a further change (SC7.001) to insert "research and development" before "activities". The land to the south of Addenbrooke's has been identified for safeguarding for the period beyond 2016 and there is therefore no need for a reference to that land in this Policy.

7.15.6. The change proposed in SC7.001 would not preclude commercial research and development. The Council also proposes a further amendment to Policy 7/4 to insert a reference to related support activities in the sub-paragraph dealing with land west of Addenbrooke's Hospital (in PR27/837/CCC). Other changes are also proposed to Policy 9/5, which I deal with in Chapter 9. In the light of those changes, I support SC7.001 and the further amendment suggested by the Council.

RECOMMENDATION

7.15.7. I recommend that the RDD be modified as follows:

a) delete the first sentence of Policy 7/4 and replace it with:

"Development will be permitted which fosters innovation and helps reinforce the existing high technology and research clusters of Cambridge, and which can demonstrate a clear need to be located in the area."

b) delete "land west of Addenbrooke's Hospital for healthcare biomedical and biotechnology activities; related higher education and research institutes;" from Policy 7/4 and replace it with

"land west of Addenbrooke's Hospital for healthcare biomedical and biotechnology research and development activities, related support activities, related higher education and sui generis research institutes;"

7.16 PARAGRAPH 6.23 (FDD)

Objections

Medical Research Council

373/10/DEP01/06_25

Summary of Objections

- The paragraph should include a reference to biomedical and clinical research.

Inspector's Reasoning and Conclusions

7.16.1. Policy 7/4 refers to biomedical and biotechnology development. Adding the suggested reference to the supporting paragraph as well would add nothing of substance to the Plan.

RECOMMENDATION

7.16.2. I recommend no modification to the RDD.

7.17 PARAGRAPHS 6.25 (FDD) AND 7.27 (RDD)**Objections**

Medical Research Council
Addenbrooke's NHS Trust
Countryside Properties/Liberty Property Trust

373/9/DEP01/06_25
399/17/DEP02/07_27
837/11/DEP02/07_27

Summary of Objections

- The paragraph should refer to specific needs to be close to other research facilities such as Cambridge University, the Medical Research Council or the teaching hospital.
- The Policy should allow appropriate ancillary functions.

Inspector's Reasoning and Conclusions

7.17.1. Paragraph 7.27 of the RDD now specifically refers to the Medical Research Council.

7.17.2. I have recommended that Policy 7/4 should be modified to include a reference to "related support activities" in its reference to land west of Addenbrooke's Hospital. However, I agree with the Council that it would not be appropriate to modify paragraph 7.27 in a similar way as it is primarily concerned with what might constitute considerations of national interest.

RECOMMENDATION

7.17.3. I recommend no modification to the RDD.

7.18 PARAGRAPH 7.29**Objections**

Addenbrooke's NHS Trust
Countryside Properties/Liberty Property Trust

399/18/DEP02/07_29
837/12/DEP02/07_29

Summary of Objections

- The reference to a legal agreement should be deleted, as occupation is properly dealt with by way of condition.

Inspector's Reasoning and Conclusions

7.18.1. There may be some circumstances where occupation could be suitably controlled by condition, and where the use of a condition is therefore preferable in accordance with the advice in Circular 5/2005. But it is clear that in other circumstances the use of conditions would not enable the occupation of premises to be regulated as required by either Local or Structure Plan policy. In such circumstances a legal agreement would be necessary.

RECOMMENDATION

7.18.2. I recommend no modification to the RDD.

7.19 POLICY 6/5 (FDD) AND POLICY 7/5 (RDD)

Objections

Addenbrooke's NHS Trust
The Chancellor, Masters and Scholars of the
University of Cambridge
The Bursars' Committee of the Cambridge Colleges

399/19/DEP01/06_P05

33/4/DEP02/07_P05
87/3/DEP02/07_P05

Summary of Objections

- There should be a reference to the Addenbrooke's site (2020), including the Clinical School, Forvie site and within the hospital buildings, in paragraph 6.28.
- The Policy should be more specific about the extent of mixed use that would be acceptable.
- The Policy should also encourage collegiate uses of these sites.

Inspector's Reasoning and Conclusions

7.19.1. Paragraph 7.30 of the RDD (formerly paragraph 6.28) now includes a reference to Addenbrooke's and its clinical school.

7.19.2. Neither Policy 7/5 nor its supporting paragraphs give any indication of the types of mixed uses that might be appropriate on the sites specified in the Policy. The Council intends that planning briefs should be prepared in respect of these two sites, and I agree that a more appropriate time to determine these matters would be during the preparation of the briefs.

7.19.3. It is unnecessary to make any reference in the Policy to the possibility of collegiate uses taking place on these sites. The absence of such a reference would not prevent a proposal for a collegiate use of any of the sites being dealt with on its own merits.

RECOMMENDATION

7.19.4. I recommend no modification to the RDD.

7.20 POLICY 7/6 AND PARAGRAPH 7.36

Objections

North Newnham Residents Association	678/3/DEP02/07_36
	678/4/DEP02/07_P06
Clerk Maxwell Road Residents Association	795/1/DEP02/07_P06
	795/7/DEP02/07_36
Bulstrode Gardens Residents Association	796/2/DEP02/07_P06
	796/3/DEP02/07_36
Mrs Penny Heath	832/2/DEP02/07_P06

Summary of Objections

- Site 7.07 (Emmanuel/City Hockey Club Sports Ground) should be removed from Policy 7.07 and designated as a protected open space. If it is not removed, its special environmental qualities should be specifically protected and it should not be developed until the West Cambridge site has been fully developed.

Inspector's Reasoning and Conclusions

7.20.1. The allocation of the Emanuel/City Hockey Club Sports Ground site for College or University development is carried forward from the adopted Local Plan. The Inspector who reported on objections to that Plan, in considering objections to the allocation of this site, expressed the view that its value in meeting future University needs outweighed its environmental contribution to the City, although she also noted the importance and sensitivity of the site in environmental terms.

7.20.2. The justification for this allocation is to meet the needs of Cambridge University over the long-term. Although the Council has made significant provision for the needs of the University in this Plan, it considers that non-Green Belt land should be reused before land to be released from the Green Belt, and its calculations show that if this site were not to be developed as allocated it would be likely to lead to the further release of Green Belt land.

7.20.3. On the other hand, Emanuel, Corpus Christi and Gonville and Caius Colleges, the owners of the site, have objected to the Plan, seeking the allocation of the site for general-purpose housing. In their objections they have stated that there has been no interest expressed in the site either by the University or by any other College for University or College-related purposes, and that it is not needed for either purpose. In similar vein, the University itself in its submissions to the inquiry has stated that the development of the site by the University would not be economically viable, and that there is no realistic prospect of implementation of the allocation for University purposes. In the light of this there appears to be little evidence that the allocation will come forward for the purposes stated in the Policy or that its allocation will reduce the amount of Green Belt land needed to be released.

7.20.4. The Council's review of open spaces carried out in 2000 assessed sites to determine whether they are important for environmental reasons, recreational reasons or both, and indicated that the Emanuel/City Hockey Club Sports Ground site was of recreational importance only. However, in its evidence to this inquiry the Council acknowledges that the site also meets the criteria for environmental importance. Nothing I have seen on site or read in the evidence leads me to disagree with that assessment. It is also clear from the evidence that much of the site is well used for predominantly formal recreation. Although the City Hockey Club part of the site does not appear to have been used for formal sport for some time, it is used informally by local residents.

7.20.5. Paragraph 4.10 of the Plan indicates that there is currently very little recreational open space surplus to requirements, and notes that the majority

makes a major contribution to the recreational resources of the local area and could not be re-created elsewhere. PPG17, which postdates the previous Local Plan inquiry, advises that existing open space and sports and recreational land should not be built on unless it is clearly surplus to requirements. Policy 7/6 of the RDD would require any displaced recreational facilities from the site to be satisfactorily relocated, but the site does not appear to be surplus to requirements at present, and although, according to the Council, a planning approval has been secured for a replacement playing field on Long Road, that is some distance from the site. Even if all the sports facilities available on the site were to be relocated to Long Road (and it is not clear whether that would be the case), there is no evidence that the replacement site would be as accessible to current users as the existing site.

7.20.6. In addition the formal and informal recreational benefits of the site to local residents would be lost, as well as some of its value as open space to the Conservation Area. It is by no means clear, therefore, that the replacement site would provide a qualitative improvement in facilities. For these reasons, the allocation of this site for development would not accord with the advice in PPG17. In view of this, and given the absence now of convincing evidence that the site has any value in meeting the needs of the University, I conclude that the allocation should be deleted from the Plan. As the Council has accepted that the site as open space also has both recreational and environmental value, it would be consistent with the approach of the Plan to other such areas that it should be protected under Policy 4/2, and shown thus on the Proposals Map.

RECOMMENDATION

7.20.7. I recommend that the RDD be modified as follows:

- a) in the first sentence of Policy 7/6 delete "sites" and replace with "site".
- b) in Policy 7/6 delete "Site 7.07 Emmanuel/City Hockey Club sports grounds off Wilberforce Road" and the subsequent paragraph.
- c) delete paragraph 7.36.
- d) include the site as a protected open space on the Proposals Map.

7.21 POLICY 6/7 (FDD) AND POLICY 7/7 (RDD)

Objections

Homerton College	19/2/DEP01/06_P07
Robinson College	24/1/DEP01/06_P07
St John's College	81/1/DEP01/06_P07
The Bursars' Committee of the Cambridge Colleges	87/22/DEP01/06_P07
Gonville & Caius	398/3/DEP01/06_P07
John Fuller	558/2/DEP01/06_P07
North Newnham Residents Association	678/5/DEP01/06_P07
	678/5/DEP02/07_P07
Concerned Residents of NW Cambridge (CRONC)	715/3/DEP01/06_P07
Homerton College	19/4/DEP02/07_P07
Clerk Maxwell Road Residents Association	795/5/DEP02/07_P07
Bulstrode Gardens Residents Association	796/4/DEP02/07_P07

Pre-Inquiry Changes: SC7.002 and FPC1**Summary of Objections**

- The Policy should apply to the Colleges as well as the University.
- Windfall sites should be allowed to be used for student hostels and affordable housing. The presumption against development other than on college sites should be removed. There should be a new policy supportive of further student accommodation outside the specifically identified sites.
- The Plan should clarify whether "affordable housing" as defined includes housing provided for College and University key workers and graduate students.
- If sites for students and College and University key workers also provide residential development they should not have to include "affordable housing".
- The Plan should distinguish between sites held for student residential purposes and those available for University staff or other housing purposes.
- Areas occupied by the University which become vacant should be used for City purposes.
- Emmanuel/City Hockey Club Sports Ground should not be allocated for student/University housing.
- Land already removed from the Green Belt for student housing development including sites 6.8, 6.11 and 6.12, should be returned to the Green Belt; no further encroachment on the Green Belt should be allowed unless immediate and pressing need and the absence of alternative sites is shown; the approach to Cambridge from the NW should be fully protected.

Inspector's Reasoning and Conclusions

7.21.1. Policy 7/7 of the RDD now refers to housing for the Colleges as well as for the University. In addition, the Proposals Schedule has been amended to distinguish between uses on sites controlled by Colleges and on those controlled by the University. Paragraph 7.42 also now states that a positive attitude will be taken towards additional windfall student hostel sites. Proposed change FPC1, superseding SC7.002, inserts this statement of support into the Policy itself, which is a more appropriate location for what is effectively an additional policy statement.

7.21.2. According to Paragraph 5.12, Policy 5/5 dealing with affordable housing will not apply on sites where the only residential accommodation to be provided will be in the form of a student hostel. But any other housing provided for College and University workers and graduate students will be subject to the requirement in Policy 5/5 (or Policy 9/7 as appropriate) that an element of that housing should be "affordable" as defined. Given the identified need for affordable housing for University employees and graduate students, there is no justification for excluding such housing from that requirement.

7.21.3. Policy 7/9 exempts residential accommodation from the requirement to provide affordable housing on sites identified in the Proposals Map which also provides student hostel accommodation for Anglia Polytechnic University. I deal with objections to that Policy in more detail below. However, although I find there special circumstances to justify that approach, there is no evidence of similar special circumstances in the case of student housing provided by the Cambridge University Colleges.

7.21.4. Mr Fuller's objection suggested that areas formerly occupied by the

University that become vacant should be subject to negotiation for use for City purposes. But that would depend on the City Council or other public body having the resources to acquire the property. Local residents are concerned at the trend in the City centre for residential properties to be taken over for College or University occupation, or to be disposed of for commercial purposes. But changes in the types of residential occupier are not always subject to planning control, and even when they are, there are not necessarily sound planning reasons for preventing a change. The City Centre benefits from its large numbers of residents, who add to the vitality and viability of the area whether they are associated with the University or not. Proposals for other changes of use of University or College property would need to be considered on their planning merits and in the light of relevant development plan policies. For these reasons I do not support any change to the Plan in respect of this objection.

7.21.5. I deal with objections relating to the allocation of Emmanuel/City Hockey Club Sports Ground in Section 7.20 above.

7.21.6. Sites 9.12, 9.15 and 9.16 in the RDD (formerly 6.08, 6.11 and 6.12 in the FDD) were allocated for development in the adopted Local Plan and are not currently in the Green Belt. The larger North West Cambridge site, including land currently in the Green Belt, has been identified in the Structure Plan for development to meet the needs of the University, and the allocations in this Plan accord with Structure Plan policy. I say more about these in Chapter 9. But there are no grounds for removing these sites from the Proposals Schedule or returning them to the Green Belt.

RECOMMENDATION

7.21.7. I recommend that the RDD be modified by the incorporation of Further Proposed Change FPC1.

7.22 PARAGRAPH 7.41

Objections

The Bursars' Committee of the Cambridge Colleges

87/4/DEP02/07_41

Pre-Inquiry Changes: SC7.003 and FPC20

Summary of Objections

- The level of provision for disabled students is unreasonable and unjustified.

Inspector's Reasoning and Conclusions

7.22.1. No evidence has been provided to support the level of specially adapted student rooms referred to in paragraph 7.41 of the RDD. The wording proposed in FPC20 (superseding SC7.003) in response to this objection, requiring "adequate" provision to be made, and including a less specific reference to relevant legislation, is more appropriate.

7.22.2. Paragraph 7.41 is repeated with identical wording in paragraphs 7.51 and 7.56. For the reasons set out above, and in the interests of consistency, those paragraphs should not remain in the Plan in the form in which they appear in the RDD or as proposed to be changed in SC7.005 and SC7.006. Paragraph 7.41, although it appears in the supporting text to Policy 7/7 which only deals with College and University of Cambridge student housing, is directed at all applications for new student accommodation, or for alterations to existing. In the light of that,

paragraphs 7.51 and 7.56 are unnecessary, and I recommend that they are deleted.

RECOMMENDATION

7.22.3. I recommend that the RDD be modified as follows:

- a) incorporate FPC20;**
- b) delete paragraphs 7.51 and 7.56.**

7.23 PARAGRAPH 7.42

Objections

Robinson College
The Bursars' Committee of the Cambridge Colleges

24/1/DEP02/07_42
87/2/DEP02/07_42

Pre-Inquiry Changes: SC7.004 and FPC2

Summary of Objections

- It is unnecessary and unreasonable to require caretaker accommodation.

Inspector's Reasoning and Conclusions

7.23.1. Given the nature of student hostels, it is reasonable for the RDD to acknowledge that there is a need to consider whether some form of supervision is necessary. However, the requirement for caretaker accommodation is unduly inflexible and does not allow site- and occupier-specific considerations to be taken into account.

7.23.2. Pre-inquiry changes SC7.002 and SC7.004 propose to include the statement of support for student accommodation on windfall sites in Policy 7/7 itself and make consequential changes to paragraph 7.42. FPC1 and FPC2 would further modify the RDD to acknowledge that the need for supervision arrangements would depend on such matters as size, location, distance from the institution served and the nature of the occupants. I consider that a specific reference to caretaker accommodation is unnecessary and so do not support SC7.004. However, FPC2 is more flexible in requiring all relevant matters to be taken into account in determining whether supervision is necessary, and for these reasons I recommend that it is incorporated in the Plan.

RECOMMENDATION

7.23.3. I recommend that the RDD is modified by the incorporation of FPC2.

7.24 POLICY 6/9 AND PARAGRAPH 6.51 (FDD), POLICY 7/9 (RDD)

Objections

St John's College
The Bursars' Committee of the Cambridge Colleges
C. Nicholson

Cambridge Regional College

81/3/DEP01/06_P09
87/23/DEP01/06_P09
318/6/DEP01/06_P09
318/9/DEP01/06_51
698/1/DEP02/07_P09

Summary of Objections

- The concession concerning affordable housing on sites provided under this Policy should apply to all student accommodation including University of Cambridge colleges as well as Anglia Polytechnic University (APU).
- Proper consideration should be given to external and internal design.
- The Policy is too prescriptive in favour of APU, and should refer to scope for other potential uses of proposals sites.

Inspector's Reasoning and Conclusions

7.24.1. The Council's justification for the concession in Policy 7/9 in favour of APU is the difficulty faced by APU in providing student accommodation on land it does not control. Only a very small number of APU students will be housed in University-controlled hostels even when APU's current building programme is completed, by comparison with the very large number of Cambridge University students housed by the Colleges. There are also severe pressures on the local housing market. If the intention of the Policy is for the cross subsidy that would otherwise have gone towards affordable housing to be used instead to support student housing, this does not appear to be unreasonable in principle in the light of these local circumstances. Although such a policy would not apply to Cambridge University Colleges or other local education providers, these are good planning reasons for treating APU differently.

7.24.2. However, the Policy is very vague as to how much student hostel accommodation would need to be provided in order for the exemption to apply, and there is no guidance in the supporting text as to how the Policy would operate in practice. Clearly there would be no planning merit in allowing the exemption if it could be triggered by the provision of a very small proportion of student accommodation.

7.24.3. There is no information as to the proportions of market housing that the Council would consider acceptable on these sites. But in my view the Policy should prevent the exemption from affordable housing from arising where there is only a token amount of student accommodation. I therefore recommend an appropriate change to the wording of the Policy.

7.24.4. In respect of the design of student accommodation, this is more appropriately dealt with at the detailed planning application stage. Other policies of the Plan give adequate guidance on design matters, and no change is needed to the Plan in this respect.

RECOMMENDATION

7.24.5. I recommend that the RDD be modified as follows:

a) modify the third sentence of Policy 7/9 to read:

If these sites are also providing residential accommodation no requirement for affordable housing will be sought under Policy 5/5 provided a significant proportion of student hostel accommodation is included to meet the needs of Anglia Polytechnic University.

b) In second sentence delete "firms" and insert "bodies".

7.25 POLICY 6/10 (FDD)

Objections

Turnstone Estates
Januarys

47/19/DEP01/06_P10
691/5/DEP01/06_P10

Summary of Objections

- It is not appropriate to restrict occupancy of development to selected groups.

Inspector's Reasoning and Conclusions

7.25.1. Circular 11/95 "The Use of Conditions in Planning Permissions" advises that conditions restricting the occupancy of premises to a particular occupier or class of occupier should only be used where special planning grounds can be demonstrated, and where the alternative would be a refusal of planning permission. In the particular circumstances of Cambridge, where there is severe pressure on the local housing market as well as a demonstrated significant shortage of accommodation for students, I consider that such special planning grounds have been demonstrated to justify the restriction on occupation of speculative student hostel accommodation set out in Policy 7/10 (Policy 6/10 in the FDD).

RECOMMENDATION

7.25.2. I recommend no modification to the RDD.

7.26 PARAGRAPH 7.52

Objections

Cllr John Durrant

838/4/DEP02/07_52

Summary of Objections

- The words "during its teaching terms" should be deleted to prevent the accommodation from being let to car drivers who would be creating pressure on local streets.

Inspector's Reasoning and Conclusions

7.26.1. It would be unreasonable to prevent student accommodation being let to other types of tenant out of term time. Use by other occupiers during vacation time would not necessarily give rise to a greater demand for car parking spaces, given the temporary nature of such occupation. There is no clear evidence that properly enforced parking controls would not be capable of controlling any problems that might otherwise arise.

RECOMMENDATION

7.26.2. I recommend no modification to the RDD.

7.27 PARAGRAPH 6.49 (FDD)

Objections

Turnstone Estates

47/20/DEP01/06_49

Summary of Objections

- Policy 6/10 is confused by the reference in paragraph 6.49 to non-speculative development for other institutions being considered "on their merits".

Inspector's Reasoning and Conclusions

7.27.1. Paragraph 6.49 has not been carried forward into the RDD.

RECOMMENDATION

7.27.2. I recommend no modification to the RDD.

7.28 POLICY 7/11

Objections

The Bell Educational Trust

83/14/DEP02/07_P11

Summary of Objections

- There should be no restriction on the expansion of existing language schools.

Inspector's Reasoning and Conclusions

7.28.1. Policy 7/11 effectively carries forward the provisions of policies HE14 and HE15 of the adopted Local Plan, and long-standing policies restricting the establishment or expansion of language schools. These policies were originally adopted because of concerns as to the pressure such schools exerted on service sector employment growth, the housing supply (particularly the private rented sector) and public facilities and amenities. The Inspector considering objections to the now adopted Local Plan concluded that language schools have no significant local or sub regional functions and can add to local housing pressures. She also concluded that the extension of capacity at existing schools could undermine the policy of restraint.

7.28.2. Policy 26 of RPG 6 requires development plans to continue to include policies for the selective management of development within the area close to Cambridge, discriminating in favour of uses that have an essential need for a Cambridge location. This theme is continued into Policy P9/7 of the Structure Plan, which requires employment land in and close to Cambridge to be reserved for development which can demonstrate a clear need to be located in the area. The prohibition on the establishment of new language schools in Policy 7/11 accords with this strategic planning guidance. The objector has suggested that Policy P9/7 provides support for language schools, but although it specifically refers to Class D1 educational uses, these may only be permitted if they show a special need to be located close to the universities or other established research facilities or associated services in the Cambridge area. Language schools have no such need, and there is therefore no inconsistency between the Policy and the final sentence of paragraph 9.52 of the Structure Plan explanatory memorandum.

7.28.3. Although the Council has acknowledged that the evidence upon which the Policy is based has not been updated for some years, I see no reason to disagree with the previous Inspector's findings that language schools have no significant local or sub-regional functions. It also seems self-evident that an increase in the number of foreign students at language schools in the city, which would be likely to occur if the existing schools were allowed to extend their teaching space, would increase the demand for accommodation, in a city where it is acknowledged that there is a high level of need for housing. Even though the

objector relies heavily on accommodation provided by local families to house its students, that in itself deprives the city of a source of accommodation that might otherwise be made available to those employed in sectors that have an essential need to locate in Cambridge.

7.28.4. There is already a significant number of foreign language students studying in the City, and the Council acknowledges its lack of control over many of the temporary schools. In those circumstances, it is even more important to continue controls over existing schools. Whilst the 10% restriction might, at first sight, appear somewhat arbitrary, it is drawn from similar restrictions in the Planning Acts, and it does not appear to me to be unreasonable to provide for a relatively minor relaxation in an otherwise restrictive policy. To remove the 10% restriction would allow for unlimited and continued expansion of existing schools, and I share the view of the previous Inspector that this would undermine the existing restraint policy.

RECOMMENDATION

7.28.5. I recommend no modification to the RDD.

7.29 OMISSION SITE 10 – LAND SOUTH OF WEST CAMBRIDGE SITE

Objections

The objections to this aspect of the plan are listed in Annex 3.

Summary of Objection

- Land at Grange Farm Cambridge should be excluded from the Green Belt and allocated for a new College and Innovation Centre.

Inspector's Reasoning and Conclusions

7.29.1. This area of Cambridge is not one of those identified in Structure Plan Policy P9/2c for housing and mixed use development, and where local planning authorities are required to carry out a review of Green Belt boundaries. Studies of the wider Green Belt west of the City have identified little scope for change if the purposes of this part of the Green Belt are to be maintained, a conclusion endorsed by the Structure Plan EIP panel. The Council's Inner Green Belt Boundary Study identified this omission site as lying within an area of land having a high or medium importance to the Green Belt in terms of its contribution towards the character and setting of the City, and considered that development would be of high or medium significance to the Green Belt. It did not recommend that this site should be released from the Green Belt.

7.29.2. I find no reason to disagree with this assessment, despite this omission site's location adjoining the University's West Cambridge site. This site lies beyond the existing highly visible and firm boundary to the built up area to the north of the site. In my view development on the site, however carefully designed, would intrude to some extent on views from the west towards the City Centre, and would have a particular impact when seen from that part of the Cotton footpath immediately west of this omission site, narrowing available views of the historic core. It would also narrow the views of the countryside available to the west at present from the built-up area, reducing the green corridor that at present penetrates into the built-up area and contributes towards the setting of the City.

7.29.3. The Plan has made provision for land for University related uses under Policy 9/7 between Madingley Road and Huntingdon Road, one of the locations identified in the Structure Plan, such uses to include new Collegiate provision. In addition, the West Cambridge site (site 7.06), which was allocated in the 1996 Local Plan, has not been fully developed.

7.29.4. The 1996 Plan also allocated two sites, Emmanuel Sports Ground and the 19 Acre Field, as being suitable for College development, neither of which has been taken up. I have recommended that the Emmanuel Sports Ground allocation should be deleted from this Plan, but the 19 Acre Field remains available should the need arise. There is no evidence that there is any need for College development that could not be met through other allocations in the Plan.

7.29.5. There is also no evidence that any need for an innovation centre could not be met on land already allocated for employment, including the West Cambridge site and other land specifically identified in Policy 7/4. Whilst the East Cambridge employment land allocation is unlikely to come forward during the Plan period, I am not satisfied that the appropriate response would be to modify Green Belt boundaries even further than already provided for, given the findings of various Green Belt studies on the effect of development in this area.

7.29.6. Under these circumstances, there appear to be no exceptional circumstances that would justify allocating the site for development or modifying the Green Belt boundary in this location.

RECOMMENDATION

7.29.7. I recommend no modification to the RDD.

7.30 OMISSION SITE 7 – LAND ADJOINING PETERHOUSE TECHNOLOGY PARK

Objections

The objections to this aspect of the plan are listed in Annex 3.

Summary of Objections

- This land should be removed from the Green Belt and allocated for housing and/or employment uses.
- The land should not be allocated for environmental, Green Belt, recreational, wildlife and traffic reasons.

Inspector's Reasoning and Conclusions

7.30.1. I deal here with the possible employment allocation. The housing allocation objection is considered in Chapter 5 above.

7.30.2. This site is open land, in the Green Belt and outside the urban area, and I consider that these factors outweigh the possibility of a shortfall in employment land during the Plan period. It is more appropriate for the Council to monitor the situation closely and take corrective action having reviewed the availability of land across the Plan area, rather than allocate Green Belt land on an ad hoc basis. I do not support the allocation of this site for employment purposes.

RECOMMENDATION

7.30.3. I recommend no modification to the RDD.

8 CONNECTING & SERVICING CAMBRIDGE

8.1 WHOLE CHAPTER

Objections

Cambridge Preservation Society	26/6/DEP01/07
Owen	252/1/DEP01/07
C. Nicholson	318/7/DEP01/07
Keymer Cavendish	431/2/DEP01/07
Environment Agency	434/6/DEP01/07
Elaine Wheatley	727/1/DEP02/08
Nick Jackson	749/1/DEP02/09
Kristine Vaaler	767/1/DEP02/08

Summary of Objections

- There is a need for some new roads but the access road linking Addenbrooke's to Hauxton Road should be in a tunnel.
- The FDD ignores Structure Plan policies concerning transport.
- Bradwell's Court should be developed as a new transport hub. The central bus station is totally inadequate.
- There should be stations at Chesterton Sidings and Addenbrooke's.
- Development should not be committed ahead of secure water supplies, and water efficiency should be built into new developments.
- Car parks should be more efficiently provided so as not to waste land.
- Public rights of way should be upgraded to bridleways, and riding encouraged.

Inspector's Reasoning and Conclusions

8.1.1. The Plan concentrates major development areas close to Cambridge at relatively high densities, which is intended to meet development needs whilst reducing the need to travel. It requires new large-scale developments to be accessible by public transport, and also requires consideration to be given to use of rail or water for freight where appropriate. The Plan also facilitates the provision of a station at Chesterton Sidings within South Cambridgeshire district. Under these circumstances the criticism that the Structure Plan's transport policies have been ignored is unwarranted.

8.1.2. There is no proposal for a new transport hub to be provided in the City Centre, and therefore no justification for including a policy for one in the Plan. The issue of provision for buses is largely one for the Local Transport Plan to address, and the absence of any specific policy relating to the bus station in the Plan does not mean that action is not being considered or taken.

8.1.3. The location of the large new developments provided for in the Plan has already been determined by the Structure Plan. Policy 8/18 addresses the need to secure water, sewerage and drainage systems before development is permitted, and Policy 3/1 deals with sustainable forms of development. Its main supporting paragraph contains a reference to reducing the use of natural resources, including water, and to the Council's Sustainable Development Guidelines which refer to water efficiency. I am not satisfied that any further reference to these matters is

needed in the Plan.

8.1.4. It is up to the highway authority, and not for this Plan, to decide whether further road capacity is required in the City.

8.1.5. One of the objectives of Chapter 8 is to minimise the distances people need to travel, particularly by car. The Plan therefore seeks to promote lower levels of private car parking in parallel with improvements to public transport. Chapter 3 of the Plan seeks to achieve the highest design quality in developments, and the aim of achieving a more efficient use of land would point towards allowing less land to be taken up by car parking. The precise design of any car parking would, however, be a matter to be addressed as part of the development control process.

8.1.6. The upgrading of public rights of way to bridleways is the subject of a separate statutory regime. As each case would need to be examined on its merits, a general commitment to upgrading would not be appropriate, whether in this Plan or elsewhere. The Council's Open Space Strategy aims to improve access to the open countryside by foot, cycle and horse, and the master planning of the urban extensions provides an opportunity for the provision of further bridleways to be considered. In the light of this, I am not satisfied that any reference to the subject of bridleways is needed in this Chapter of the Plan. It is not appropriate for this Plan to encourage the provision of riding schools or similar establishments. But other policies of the Plan provide a policy framework within which proposals for new equestrian establishments would be considered.

8.1.7. I deal in more detail with the question of the Addenbrooke's access road in Chapter 9. According to the Council, the road is likely to be constructed under highway authority powers and subject to a separate procedure. However, there is no evidence that a tunnel would be affordable. The issue of providing for a station at Addenbrooke's is dealt with in Chapter 2.

RECOMMENDATION

8.1.8. I recommend no modification to the RDD.

8.2 OBJECTIVE 1

Objections

Ventress Property Developments Limited
Anne Campbell

690/4/DEP01/07_OB1
768/5/DEP02/08_OB1

Summary of Objections

- There should be park and ride facilities at all major entry points to the City. Road charging should only be introduced at peak hours and where there is a clear and attractive alternative.
- Objective 1 should include reduction of journey times.

Inspector's Reasoning and Conclusions

8.2.1. Were any additional park and ride sites to be proposed for the City, it would be likely that they would be located within South Cambridgeshire district, and so would not be a matter for this Plan. The question of road charging would be a matter for the County Council as highway authority to consider, although reference is made to this at the end of paragraph 8.3 of the RDD.

8.2.2. In my view the Council is right in Objective 1 to concentrate on minimisation

of the distances people need to travel, as this is a very significant factor in determining environmental impact. Whilst reducing journey times on public transport is likely to make it more attractive, this is not a matter over which the local plan has a great deal of influence.

RECOMMENDATION

8.2.3. I recommend no modification to the RDD.

8.3 PARAGRAPH 7.2 (FDD)

Objections

Windsor Road Residents

366/26/DEP01/07_02

Summary of Objections

- Public transport must be improved before a reduction in car use will occur.

Inspector's Reasoning and Conclusions

8.3.1. The Plan contains a policy relating to public transport services within the urban extensions, a matter over which it can have some influence. However, the improvement of public transport serving existing areas of the City is not within the remit of this Plan.

RECOMMENDATION

8.3.2. I recommend no modification to the RDD.

8.4 PARAGRAPH 7.3 (FDD) AND PARAGRAPH 8.3 (RDD)

Objections

The Bursars' Committee of the Cambridge Colleges
Christ's College

87/24/DEP01/07_03
364/7/DEP01/07_03
364/8/DEP01/07_03
364/9/DEP01/07_03
366/27/DEP01/07_03
366/52/DEP02/08_03
366/62/DEP01/07_03
377/19/DEP01/07_03

Windsor Road Residents

Dr. G. E. Rogers

Summary of Objections

- Fiscal measures are matters for the highway authority. A policy on road charging should not be introduced until public transport has been improved.
- Policy statements should be included as policies and not hidden in the supporting text.
- Objections are made to the car parking standards for the University and Colleges.
- It is questioned whether "a modal shift away from car use" is achievable.
- More specific plans are needed to ensure the implementation of the policies.

Inspector's Reasoning and Conclusions

8.4.1. As the final sentence of Paragraph 8.3 of the RDD sets out the Council's aspirations in respect of road user charging or workplace parking levies, whilst making it clear that these are matters within the County Council's remit, I see no reason why it should be omitted from the Plan. As they are statements of the City Council's view, but not policies, they are appropriately included in the supporting text. It is not necessary to itemise here all of the matters that the County Council will need to take into account when it considers the feasibility and likely effectiveness of fiscal measures in controlling private car use.

8.4.2. The Local Plan is not the document through which transport proposals will be implemented, and therefore more detail as to implementation would not be appropriate here.

8.4.3. I deal with objections to the car parking standards in Chapter 11. Those standards have been subject to public consultation as part of the Local Plan review.

RECOMMENDATION

8.4.4. I recommend no modification to the RDD.

8.5 PARAGRAPH 8.4

Objections

Dr. J. I. Coates

790/2/DEP02/08_04

Summary of Objections

- Objection is made to the CGB scheme.

Inspector's Reasoning and Conclusions

8.5.1. The CGB scheme, which is being promoted by the County Council, is the subject of a separate statutory approval process and is outside the remit of this Local Plan.

RECOMMENDATION

8.5.2. I recommend no modification to the RDD.

8.6 POLICY 7/1 (FDD) AND POLICY 8/1 (RDD)

Objections

Cambridge Preservation Society

26/34/DEP01/07_P01

Turnstone Estates

26/35/DEP01/07_P01

Cambridgeshire County Council

47/21/DEP01/07_P01

Marks and Spencer Plc

55/36/DEP01/07_P01

Dernford (Regent) Ltd

367/6/DEP01/07_P01

Bidwells Property Consultants

391/17/DEP01/07_P01

Addenbrooke's NHS Trust

396/56/DEP01/07_P01

V & M Whittaker

399/21/DEP01/07_P01

H. Tyson

439/3/DEP01/07_P01

The Perse School for Boys

462/3/DEP01/07_P01

Anne Campbell

754/12/DEP02/08_P01

768/6/DEP02/08_P01

Summary of Objections

- The wording of the Policy is impractical. The most sustainable location may not be available, and it is questioned which sequential test is being referred to. Compliance with the sequential test would not necessarily mean the location is sustainable
- Disaggregation of uses is not always appropriate. "Major new development" needs further explanation and it should exclude clinical and related research developments.
- Developments that reduce the need to travel should be favoured, and there should be more cross-referencing.
- The Plan should incorporate national advice concerning the trigger points for TAs.
- The anti-car bias of the Local Plan should be eliminated. New developments should be placed at park and ride sites.
- The Policy should only relate to new development and not extensions to existing uses.
- The Policy should apply equally to residential development.

Inspector's Reasoning and Conclusions

8.6.1. Policy 7/1 of the FDD has been redrafted, and its replacement, Policy 8/1 in the RDD, deals with the location of development. The Plan cannot govern how people choose to travel, but by requiring development to be located where access is available by public transport, cycling and walking it can ensure that a choice of modes of transport is available. The sequential test is now briefly defined, and there is no longer a reference to sustainable location. It is clear from government guidance what the sequential test requires; further explanation is unnecessary.

8.6.2. Policy 8/1 refers to "proposals likely to attract a large number of trips" which is clearer than the reference to "major new developments" in the FDD. The question of what is "a large number" would be determined on a case-by-case basis. It would not be appropriate to use the national indicative trigger points for TAs in this somewhat different context. There is now no reference in the Policy to disaggregation.

8.6.3. The Plan's strategy of concentrating new development close to Cambridge is likely in practice to reduce the need to travel, but the Plan would not be improved significantly by a reference to reducing the need to travel in this Policy. As the Plan is to be read as a whole, cross-referencing to other policies in the Plan is not necessary.

8.6.4. The effect of traffic generated by clinical and related research developments is no different from the effect of traffic generated by other developments. There is therefore no convincing reason to exempt such developments from the requirements of this Policy.

8.6.5. One objection has suggested a policy incorporating a number of matters which are the responsibility of the highway authority and not the City Council, and are not therefore appropriate for inclusion in the Plan. The aim of the Plan is to facilitate a choice of transport modes in order to encourage a shift away from car use, and that accords with national policy guidance. This Plan does not contain any proposals for central underground car parks, and in the absence of any evidence that such car parks are a realistic possibility it would not be appropriate to refer to them in the Plan. The Station Area Development Framework does, however, indicate the provision of a multi-storey car park at the Station area. The question of car parking provision at Addenbrooke's Hospital is a matter that will have to be

considered when development proposals for that area come forward.

8.6.6. Locating new developments at park and ride sites would be contrary to national policy guidance in PPG 6 and in the case of Cambridge would also result in inappropriate development in the Green Belt.

8.6.7. It is reasonable for the Policy to apply to extensions to existing development that are likely to attract a large number of trips, as its aim is to locate such developments in order to minimise the need for private car use. The priority given by the Policy to locating non-residential proposals in central locations is appropriate because residential development generally tends to generate a lower number of trips than many non-residential uses.

RECOMMENDATION

8.6.8. I recommend no modification to the RDD.

8.7 PARAGRAPH 7.4 (FDD)

Objections

Cambridgeshire County Council

55/37/DEP01/07_04

Summary of Objections

- Parking standards should be used as a way of reducing car travel.

Inspector's Reasoning and Conclusions

8.7.1. The use of parking standards to reduce parking provision does not by itself reduce the need to travel by car, and such a reference would not therefore be appropriate.

RECOMMENDATION

8.7.2. I recommend no modification to the RDD.

8.8 PARAGRAPH 8.6

Objections

Anne Campbell
Jonathan Larmour

768/7/DEP02/08_06
776/15/DEP02/08_06

Summary of Objections

- The reference to out-of-centre non-residential development should be removed for consistency with Policy 8/1.
- Paragraph 8.6 should also mention accessibility by cycle.

Inspector's Reasoning and Conclusions

8.8.1. As I have not recommended that Policy 8/1 should apply to residential development, there is no need for any consequential change to this paragraph.

8.8.2. Policy 8/1 makes specific reference to access by cycle, and there is no need to repeat that in this paragraph.

RECOMMENDATION**8.8.3. I recommend no modification to the RDD.****8.9 POLICY 7/2 (FDD) AND POLICY 8/2 (RDD)****Objections to Policy 7/2**

The objections to this aspect of the Plan are listed in Annex 3.

Objections to Policy 8/2

Windsor Road Residents
Anne Campbell

366/53/DEP02/08_P02
768/8/DEP02/08_P02

Summary of Objections

- HQPT provision should be assured for the future.
- The use of SPD is objected to if it is not included in the Plan. The Policy should reflect that contributions towards transport improvement can only be sought, not demanded, and actual contributions should be subject to negotiation.
- All local impacts will need to be mitigated. There should be a reference to area action plans, and a requirement for travel plans for new non-residential development.
- There should be more detail on how TAs will be judged and monitored. The impact on Cambridge of developments outside the City should be considered.
- The Plan should incorporate national advice concerning the trigger points for TAs.
- The definition of "major new developments" should be consistent with that in Policy 7/1, and should exclude clinical and related research development.
- The Policy should refer to the Highways Agency's requirements in respect of development in the vicinity of trunk roads.
- The size of any development should be restricted to the availability of a good transport infrastructure to support it.

Inspector's Reasoning and Conclusions

8.9.1. It is reasonable that where new development is required to provide public transport services, those services should be secured for a reasonable period of time. Policy 8/7 deals with this point specifically in respect of the urban extensions.

8.9.2. The reference in Policy 7/2 of the FDD to a requirement for contributions towards transport improvements has not been carried forward into Policy 8/2 of the RDD, and Policy 8/3 indicates that financial contributions will be sought, not required. There is no longer any reference in this part of the Plan to SPD.

8.9.3. Policy 8/3 of the RDD indicates the circumstances where mitigating measures will be required, and also makes reference to staff travel plans. The Areas of Major Change are dealt with in Chapter 9, which identifies some of the transport measures that will be needed in respect of these developments. It is not necessary to repeat that in this Policy.

8.9.4. It is not appropriate to include in this Policy details as to how TAs will be judged and monitored, as enforcement is beyond the scope of the Local Plan. Policies of the Local Plan can only apply to development within Cambridge,

although the City Council would no doubt wish to make representations in respect of development proposals outside its boundary that might affect the City.

8.9.5. There is no need to repeat in this Policy national advice concerning the trigger points for TAs. Policy 8/2 no longer refers to "major new developments". I deal in sections 8.13 and 8.21 with the question of clinical and related research development.

8.9.6. The Highways Agency has powers in respect of development affecting trunk roads. A specific reference to those powers is unnecessary, as they will be exercisable in any event.

8.9.7. The Policy provides that developments will not be permitted if they have an unacceptable transport impact. This will effectively restrict the size of any development to what can be supported by the existing and/or proposed transport infrastructure.

RECOMMENDATION

8.9.8. I recommend no modification to the RDD.

8.10 PARAGRAPH 7.5 (FDD)

Objections

Windsor Road Residents
Bidwells Property Consultants

366/63/DEP01/07_05
396/57/DEP01/07_05

Summary of Objections

- There should be more detail on how TAs will be judged and monitored. The impact on Cambridge of developments outside the City should also be considered.
- The Plan should incorporate national advice concerning the trigger points for TAs.

Inspector's Reasoning and Conclusions

8.10.1. I deal with these objections in section 8.9.

RECOMMENDATION

8.10.2. I recommend no modification to the RDD.

8.11 PARAGRAPH 8.7

Objections

Cambridgeshire County Council
Windsor Road Residents
Network Rail
South Cambridgeshire District Council

55/38/DEP02/08_07
366/74/DEP02/08_07
370/1/DEP02/08_07
461/13/DEP02/08_07

Summary of Objections

- The level of on-site parking should be determined before the TA is carried out.
- There should be more detail of how TAs will be judged and monitored.

- The paragraph should refer to pedestrian impact on the station.
- The second sentence could be read as promoting car free development at major development sites. Policy should not be made in the supporting text.

Inspector's Reasoning and Conclusions

8.11.1. The final sentence of paragraph 8.7 requires consistency between the TA and the level of parking proposed in the development. This is not an unreasonable requirement, and does not imply that the level of car parking will not have been agreed prior to the TA being carried out.

8.11.2. I deal with the objections in the second bullet point in section 8.9.

8.11.3. The level of pedestrian activity within the station itself will be directly related to the rail services provided, and it is primarily the responsibility of the station managers and the train operating companies to address the capacity of the station to cope with the services provided. Whilst national planning guidance does not rule out the use of developer contributions for funding rail infrastructure, there is no requirement that this should be the case. The Council has chosen not to seek funding from this source for improvements to the station. Rail passengers will, however, benefit from the proposed improvements to the area around the station which will be funded in part through developer contributions.

8.11.4. The Council's view is that additional rail passengers passing through a station due to increased development should not be regarded as a negative impact for the purposes of Policy 8/2. There is no convincing evidence that this view is unreasonable, and as an increase in rail passengers should result in an increase in ticket revenues it is appropriate that any improvements to Cambridge Station should remain the responsibility of the station operator.

8.11.5. According to the Council, the reference to zero increase or reduction in car traffic generation is aimed at more central sites where traffic problems are acute. The car parking standards in Appendix C contemplate the possibility of car-free developments outside the controlled parking zone which covers the central area. Whether or not a "car-free" development would be acceptable would depend on the particular circumstances of each development proposal. However, the sentence referring to car-free development is not seeking to make policy, but is explaining how policy will be applied.

RECOMMENDATION

8.11.6. I recommend no modification to the RDD.

8.12 PARAGRAPH 7.6 (FDD)

Objections

British Land Universal
Windsor Road Residents
Windsor Road Residents

30/2/DEP01/07_06
366/64/DEP01/07_06
366/56/DEP02/08

Summary of Objections

- Contributions towards transport improvement should be negotiated on a case-by-case basis.

- There should be more detail of how TAs will be judged and monitored. The impact on Cambridge of developments outside the City should also be considered.
- Paragraph 7.6 from the FDD should be reinserted.

Inspector's Reasoning and Conclusions

8.12.1. This paragraph does not appear in the RDD, as Policy 7/2, which it supported, has been replaced. Policy 8/3 of the RDD provides that contributions towards infrastructure improvements will be sought, and not required. It would not be appropriate to reinstate paragraph 7.6, because it refers to matters which no longer appear in the Policy.

8.12.2. I deal with the objections in the second bullet point in section 8.9.

RECOMMENDATION

8.12.3. I recommend no modification to the RDD.

8.13 POLICY 8/3

Objections

Land Securities Group Plc	37/7/DEP02/08_P03
Network Rail	370/2/DEP02/08_P03
Laing Homes North Thames	380/3/DEP02/08_P03
Addenbrooke's NHS Trust	399/19/DEP02/08_P03
Ashwell Developments Limited	786/4/DEP02/08_P3
Papworth Hospital NHS Foundation Trust	834/1/DEP02/08_P03
Countryside Properties/Liberty Property Trust	837/13/DEP02/08_P03

Summary of Objections

- The wording of the Policy should be consistent with current government guidance on planning obligations.
- There should be a reference to station improvements.
- Addenbrooke's clinical improvements and other hospital development should not have to contribute to other community infrastructure developments.
- The Policy should require the calculation of off-site contributions to take account of on-site improvements and the positive effects of travel plans.

Inspector's Reasoning and Conclusions

8.13.1. The advice in Circular 5/2005 "Planning Obligations" (CD1.52) will be relevant in the site specific negotiations on transport infrastructure arising from planning applications. It is not, however, necessary to repeat that guidance in the Plan. It is inevitable that the Policy will lack the detail sought by some objectors given that the precise nature of mitigation will be determined on a case-by-case basis.

8.13.2. I deal with the objection in the second bullet point in section 8.11.

8.13.3. The Council's approach has been to set out general principles in the Policy itself, but to use SPD to provide detailed guidance on the application of the Policy. This approach accords with the advice in PPS 12, and in my view is sound. It is also not unreasonable for the Policy to require, as a matter of principle, that all developments should mitigate the impacts that they have on transport

infrastructure. The effect of traffic generated by clinical and related research developments is no different from the effect of traffic generated by other developments.

8.13.4. The assessment of those impacts would be carried out on a site by site basis, and would need to take into account all relevant matters, including the positive effects of existing travel plans. However, including details as to how assessments would be carried out is unnecessary and would result in an over-lengthy Plan.

8.13.5. The Council will be able to require only contributions that meet the Secretary of State's policy tests set out in Circular 5/2005, which advises that it is for the local authority and other public sector agencies to decide what is to be the balance of contributions made by developers and by public sector infrastructure providers towards infrastructure needs. The Southern Area Corridor Transport Plan indicates that for sites providing essential public infrastructure to serve the needs of the community, a payment towards strategic transport mitigation requirements may not be appropriate. The Council has also indicated in evidence that the question whether strategic infrastructure requirements should be applied to clinical or health-related development is under review. However, in the light of the advice in Circular 5/2005, it is for the City Council to determine the circumstances in which it will or will not seek contributions in respect of particular developments. I find nothing unsound in the approach set out in Policy 8/3.

8.13.6. Policy P8/3 of the Structure Plan requires Area Transport Plans to be developed for Cambridge, which will identify transport improvements to be made over the Plan period and provide the basis for identifying transport contributions that will need to be made by developers. These are intended to link increased demand on the transport network to infrastructure requirements to meet those needs. The contributions to be required from developers under the Policy may be invested in infrastructure that will confer some wider benefit on the community, but provided the contribution is directly related in scale to the impact of the proposed development then in my view there will be no conflict with the advice in Circular 5/2005. The Circular also supports the pooling of associated developers' contributions in appropriate circumstances, provided there is a direct relationship between the development and the infrastructure and the scale of the contribution, as well as contributions to specific future provision of infrastructure. In my view, the approach set out in Policy 8/3 accords with both Structure Plan requirements and advice in the Circular.

8.13.7. Developments can have impacts on transport infrastructure both in the immediate vicinity and in the wider area, and it is not unreasonable in principle to require all of those impacts to be mitigated. Given the specific pressures on transport infrastructure in the City, and the lack of significant spare capacity, the Council is justified in taking the view that a development placing demand on an already strained transport system will be unacceptable in planning terms unless it provides mitigating measures. As indicated above, the assessment as to what might be appropriate in the way of mitigation would need to be carried out on a site by site basis having regard to the advice in Circular 5/2005, and it may be appropriate to take into account on-site improvements to public transport, depending on whether those improvements merely address the impact of the development or go beyond that. However, this is a level of detail that goes beyond what would be appropriate to include in the Plan.

8.13.8. I find no convincing evidence that the Policy as worded could be misused or would be likely to run the risk of double counting. However the final sentence of the Policy lacks clarity. I therefore recommend a modification to make

it clear that necessary site specific measures will be required, as well as a staff travel plan for non-residential developments.

RECOMMENDATION

8.13.9. I recommend that the RDD be modified as follows:

delete the final sentence of Policy 8/3 and replace it with "Developments will also be required to provide any necessary site-specific measures, and a staff travel plan will be required for non-residential developments".

8.14 PARAGRAPH 8.9

Objections

The Perse School for Boys

754/13/DEP02/08_09

Summary of Objections

- The provision of payments should be linked to the tests set out in government advice on planning obligations.

Inspector's Reasoning and Conclusions

8.14.1. The advice in Circular 5/2005 will be relevant in assessing, on a site by site basis, what payments should be sought from particular developments. However, it is unnecessary to repeat that advice here.

RECOMMENDATION

8.14.2. I recommend no modification to the RDD.

8.15 POLICY 7/3 AND PARAGRAPH 7.7 (FDD), POLICY 8/4 (RDD)

Objections

Windsor Road Residents

366/30/DEP01/07_P03

Terry Spencer

366/65/DEP01/07_07

Laing Homes Ltd

661/1/DEP01/07_P03

Wrenbridge Land Ltd

708/33/DEP01/07_P03

Taylor Woodrow Developments Limited

709/33/DEP01/07_P03

Peter Convey

710/33/DEP01/07_P03

766/8/DEP02/08_P04

Summary of Objections

- There should be more specific measures to ensure the implementation of stated policies, there is a need to consider potential conflicts between users, and it is essential to make alternative provision for those who cannot walk and cycle.
- Cycling should be made safer and more attractive.
- The Policy might prevent best use being made of previously developed sites.
- The river tow path should be used as a means of cycle access to the City.

Inspector's Reasoning and Conclusions

8.15.1. The specific measures to be taken to secure implementation of stated policies are a development control management matter for the Council, and do not need to be included in the Plan. The detailed design of cycle lanes and footpaths, including giving more priority to cyclists, is also one to be addressed at the development control stage. However, paragraph 8.11 specifically makes reference to the need to consider safety and potential conflicts between users. The Policy does not prevent consideration also being given to the needs of those who cannot walk or cycle.

8.15.2. The Policy is aimed at furthering the Council's objective of encouraging walking and cycling, which itself accords with national policy guidance. There is no evidence to support the suggestion that application of the Policy may prevent best use being made of previously developed sites, and it is difficult to imagine the circumstances in which this might be so. However, the Council is able to take account of site conditions in assessing specific development proposals, and if these were to make compliance with the Policy impossible it would be able to deal with the matter as a special case.

8.15.3. The river tow path is to form part of the National Cycle Network, but it is not necessary to identify such routes in the Plan.

RECOMMENDATION

8.15.4. I recommend no modification to the RDD.

8.16 POLICY 7/4 (FDD) AND POLICY 8/5 (RDD)

Objections

Cambridge Preservation Society	26/37/DEP01/07_P04
	26/38/DEP01/07_P04
Cambridgeshire County Council	55/39/DEP01/07_P04
The Bursars' Committee of the Cambridge Colleges	87/26/DEP01/07_P04
	87/27/DEP01/07_P04
Bidwells Property Consultants	396/51/DEP01/07_P04
Cambridge Cycling Campaign	437/6/DEP01/07_P04
The Bell Educational Trust	83/20/DEP02/08_P05

Further Proposed Change: FPC13

Summary of Objections

- High quality public transport (HQPT) provision should be assured for the future.
- Safeguarded routes should be shown on the proposals map. More detail is necessary about the access road to Addenbrooke's and connections to East Cambridge.
- The Plan should protect existing Public Rights of Way, and there should be links to open space and educational establishments.
- The Council should review cycling routes in the northern triangle of the City.
- Support should be given for transit between University and College sites.
- A number of new cycle/pedestrian routes are suggested. Existing routes should be protected and new routes should be maintained by the developers.
- There should not be a route through the Bell site. Funding of the routes should be equitable.

Inspector's Reasoning and Conclusions

8.16.1. I deal with the securing of public transport services for the future in section 8.9 and section 8.21

8.16.2. Strategic routes to be safeguarded for cycling and public transport have been identified in guidance adopted by the Council, and links within new developments to meet local needs will be identified at a later stage. There is no need for these routes to be identified in the Plan itself. The planning application for the new access road to Addenbrooke's will require an environmental impact assessment and TA, and the landscape and environmental impact of the proposals will be examined at that stage. In the absence of those documents, it is not possible for the Plan to be any more detailed about the road. The transport strategy for Cambridge East is still in preparation, and until that has been completed the Plan cannot be more specific about high-quality public transport in that area.

8.16.3. The protection of public rights of way is a matter for the highway authority, and although in considering planning applications the Council will have to take account of any public rights of way, it is not necessary to make specific reference to that in the Plan. It is for the Council and the highway authority to consider appropriate locations for new routes, and the Council has indicated that attention will be paid to areas which have very high cycle and pedestrian flows. However this is a highway management matter, and it is not appropriate to include a reference in the Plan. Restrictions on cycling in the northern triangle of the City Centre are also traffic management matters for the highway authority, and making a reference to a review of these in the Plan is not appropriate.

8.16.4. The Policy itself requires existing routes to be retained and improved wherever possible, and paragraph 8.14 indicates the standards that should be achieved by new routes and the matters to be taken into account in their design. FPC 13 would reflect the consideration that the County Council is unlikely to publish the design guide referred to there, and I support it in the interests of accuracy. The Council is able to require developers to maintain cycleways through planning conditions or obligations, but that is something to be considered on a site by site basis and no change is needed to the Plan.

8.16.5. The safeguarding of routes for walking and cycling within developments accords in principle with the Council's objective of increasing walking and cycling, and with national policy guidance aimed at encouraging non car-borne modes of transport. Paragraph 8.13 notes that provision will be sought which is proportionate to the scale of development being undertaken. These routes are intended for use by those living within the development as well as others, and their provision by developers on the basis set out in the Plan is not an unreasonable requirement.

RECOMMENDATION

8.16.1. I recommend that the RDD is modified by the incorporation of FPC 13.

8.17 PARAGRAPH 7.8 (FDD)**Objections**

Dr. G. E. Rogers

377/23/DEP01/07_08

Summary of Objections

- Cycle paths should be improved, and should be consistent and interconnecting.

Inspector's Reasoning and Conclusions

8.17.1. Policy 8/5 in the RDD now requires the improvement of existing routes where possible. The need for consistency and interconnectivity of routes is a matter for implementation and no change to the Plan is necessary.

RECOMMENDATION

8.17.2. I recommend no modification to the RDD.

8.18 PARAGRAPH 8.13**Objections**

Jonathan Larmour

776/7/DEP02/08_13

Summary of Objections

- There should be wide on-road cycle lanes. Pavement provision should be physically segregated from pedestrians.

Inspector's Reasoning and Conclusions

8.18.1. The precise details of the form of provision for cyclists can be determined at the development control stage. It is not necessary to provide this level of detail in the Plan.

RECOMMENDATION

8.18.2. I recommend no modification to the RDD.

8.19 POLICY 7/5 AND PARAGRAPH 7.9 (FDD)**Objections**

C. Nicholson

318/8/DEP01/07_P05

The House Builders Federation
Cambridge Cycling Campaign

318/10/DEP01/07_09
362/15/DEP01/07_P05
437/7/DEP01/07_P05

Summary of Objections

- The requirement for on-street cycle parking needs rethinking.
- It is unreasonable to require individual cycle parking stands.
- There should be two policies, one dealing with cycle parking standards and one with on-street parking. The cycle parking standards should be made more enforceable, and a more detailed policy wording is suggested.

Inspector's Reasoning and Conclusions

8.19.1. RDD Policy 8/6, which replaces this Policy, no longer refers to on-street cycle parking.

8.19.2. Cycle parking is important in a City where over 25% of residents cycle

to work. The explanatory paragraphs now make it clear that cycle parking should be provided on site. I agree with the Council that the key issue is security, but the detail of what should be provided is a matter for the cycle parking standards, which I consider further in Chapter 11.

8.19.3. Objection has been made to the Council's record of applying its policies on cycling. This is not a matter for me.

RECOMMENDATION

8.19.4. I recommend no modification to the RDD.

8.20 POLICY 7/6 (FDD)

Objections

Turnstone Estates	47/22/DEP01/07_P06
Cambridgeshire County Council	55/40/DEP01/07_P06
Railfuture/Transport 2000	282/1/DEP01/07_P06
The House Builders Federation	362/16/DEP01/07_P06
Windsor Road Residents	366/31/DEP01/07_P06
Dernford (Regent) Ltd	391/18/DEP01/07_P06
Trumpington Environmental Action Group (TEAG)	460/20/DEP01/07_P06

Summary of Objections

- The Policy should not imply that developments not within 400m of a public transport node will not be permitted.
- The first sentence is too permissive. Local transport plan targets should also be referred to.
- The CGB will add to congestion in Cambridge.
- Contributions to bus services should only be required where development has a significant impact on the transportation network.
- More detail should be included in the Policy.

Inspector's Reasoning and Conclusions

8.20.1. RDD Policy 8/7, which replaces FDD Policy 7/6, now requires all development within the urban extensions to be served by public transport within 400m. It no longer carries the implication objected to, and is not expressed permissively. The revised Policy does not include any reference to local transport plan targets, an approach I support because such a reference is unnecessary. The Policy also defines the minimum level of service to be provided.

8.20.2. The CGB scheme, which is being promoted by the County Council, is the subject of a separate statutory approval process. Decisions about it are outside the remit of this Local Plan.

8.20.3. I deal with the remaining objections under Policy 8/7 below.

RECOMMENDATION

8.20.4. See below.

8.21 POLICY 8/7

Objections

The objections to this aspect of the Plan are listed in Annex 3.

Further Proposed Change: FPC9

Summary of Objections

- The Policy is too prescriptive, impractical and unreasonable.
- Objections are made to the detailed requirements of the Policy, and to absence of detail.
- The Structure Plan definition of HQPT should be used.
- Account should be taken of any particular costs of the development and any other planning objectives that need to be given priority.
- Bus services may not be necessary in every case. Monies for transport infrastructure should not be collected twice.
- It should be acknowledged that provision may be phased.
- The Plan should include consideration of the proposals by the Cam Too project.

Inspector's Reasoning and Conclusions

8.21.1. Policy 8/7 of the RDD now relates to development within the urban extensions where it is important that residents can have the opportunity of using a practical, convenient and affordable public transport system at an early stage in the development. If an urban extension is not already served by HQPT as defined, then it is in accord with the requirements of Structure Plan Policy P8/6 and with the overall objectives of the Plan to require one to be provided. However, existing public transport services will contribute towards satisfying the Policy's requirements.

8.21.2. Some objectors have expressed concern at the practicality of securing new services in these areas. However, the Cambridge area has a number of bus operators, and there is no convincing evidence that none of them would be prepared to provide the required bus service or that the developer would be open to ransom as a result of the Policy requirements. Although some level of subsidy may be required from the developer at least at the outset, developments in the urban extensions will be at a high density, which is likely to increase the viability of services by comparison with services in established lower density parts of the City.

8.21.3. The definition of HQPT in the RDD is the same as that in the Structure Plan in terms of frequency of service. It is important to inform developers as to the level of service expected, and for this reason the inclusion of the definition in this Plan, although it also appears in the Structure Plan, is appropriate. A peak frequency of service of every 10 minutes enables passengers to turn up at the bus stop without checking the timetable, which removes a significant obstacle to the attractiveness of bus use. As the planning of the urban extensions is at a relatively early stage the details sought by some objectors have not yet been determined. Even if they were available, the information would be too detailed to include in the Local Plan. The Structure Plan definition also makes reference to the standard of buses to be used, but I am not satisfied that it is necessary to repeat such detail here.

8.21.4. In order for residents to find the bus service attractive, it must be easily accessible. The distance of 400m to the nearest public transport service appears to be a reasonably well established standard in this context, and

represents a 5-minute walk or thereabouts. A longer distance would be likely to deter the elderly or less mobile, or those with heavy bags to carry, as well as many able-bodied people. The Council has acknowledged that in limited circumstances it may not be possible to bring all parts of a development within the 400m distance, but that is a matter that could be dealt with at the master planning or application stage. Given that there may always be circumstances where it is not appropriate to apply the Policy fully, there is no need to make specific reference to this in the Plan. Similarly, particular costs of development, and other planning objectives which might need to be given priority, are matters that the Council is able to take into account in appropriate circumstances, in the light of the advice in Circular 5/2005. There is no need for an explicit reference in the Policy.

8.21.5. The Council has acknowledged in its evidence to the inquiry that provision of a full public transport service may not be practical from first occupation of the development, and therefore the exact phasing of the introduction of the services will be determined at a later stage. In my opinion this clarification should be included in the supporting paragraphs to the Policy, because although the acknowledgement appears in inquiry documents, these are less accessible than the Plan itself.

8.21.6. Whilst some objectors have argued that the requirements to provide a service for a period of up to five years is unreasonable, Cambridgeshire County Council has argued that it may take longer than five years to establish a public transport system meeting its requirements. In my view, it is reasonable to require the provision of services for a period that will allow them to become established and viable without subsidy, otherwise there is a risk that at the end of the minimum period the services will be withdrawn by the operators. A maximum of three years suggested in one objection does not seem to me to be sufficiently long, particularly bearing in mind that this will be from first occupation of development. On the other hand, the requirement in the Policy would allow a period of less than five years to be required in appropriate circumstances. As drafted, in my view the Policy achieves an appropriate balance, and I do not recommend any modification in this regard.

8.21.7. Some objectors have argued for a greater level of detail to be included in the Policy of matters such as the mechanisms for guaranteeing the minimum level of service and a means of controlling costs. However, these are more appropriately addressed as part of the development control process, as they may vary on a case-by-case basis.

8.21.8. There appears to be no good reason for treating clinical or other health care development differently from commercial development. Such developments are likely to give rise to similar demands for transport as commercial developments, and these demands should be addressed by provision of public transport services in the same way. Addenbrooke's argue that green travel plans should also be taken into account in applying the Policy. But as such plans would be expected to take account of existing public transport services, it is not clear why the existence of such a plan would reduce the need to provide public transport. However, there would be nothing to prevent the Council from taking into account a green travel plan if it could be shown, in any particular case, that it was reducing the level of demand for public transport without increasing the use of private cars.

8.21.9. In my view, there is likely to be a relationship between the provision of public transport services under this Policy and the requirement to make mitigating measures under Policy 8/3. This is because the provision of public transport services is likely to affect the demand the development will place on the transport system and thus the extent of mitigation required. However, the

relationship will vary on a site by site basis, and no express reference is necessary in this Policy.

8.21.10. A full social, environmental and economic appraisal of the major transport scheme proposed by the Cam Too Project would be required before it could be considered for inclusion in the development plan. But FPC 9 would add an additional paragraph to the Plan, agreed with the Cam Too Project, explaining what is proposed. This is as far as it would be appropriate for the Plan to go.

RECOMMENDATION

8.21.11. I recommend that the RDD be modified as follows:

a) At the end of paragraph 8.17 add the following:

It is important that, as far as possible, public transport is in place from the start for those occupying new developments. However, full provision may not be practical from first occupation, and therefore the exact phasing of the introduction of services will be determined at a later stage.

b) Incorporate FPC 9.

8.22 PARAGRAPH 8.16

Objections

Windsor Road Residents

366/66/DEP02/08_16

Summary of Objections

- The transport needs of those in areas neighbouring the new developments should also be considered.

Inspector's Reasoning and Conclusions

8.22.1. The provision of public transport for existing areas of development is outside the scope of the Plan. Such matters are for Cambridgeshire County Council to consider addressing either through its local transport plan or otherwise.

RECOMMENDATION

8.22.2. I recommend no modification to the RDD.

8.23 PARAGRAPH 8.17

Objections

Cambridgeshire County Council

55/40/DEP02/08_17

Summary of Objections

- In major development sites it may take more than five years to establish an appropriate public transport system.

Inspector's Reasoning and Conclusions

8.23.1. I deal with this objection in section 8.21.

RECOMMENDATION**8.23.2. I recommend no modification to the RDD.****8.24 PARAGRAPH 8.18****Objections**

Cambridgeshire County Council
Windsor Road Residents

55/41/DEP02/08_18
366/67/DEP02/08_18

Summary of Objections

- "Outer sites" should be amended to "Areas of Major Change".
- Stronger wording is required. Affordability and the need for subsidy are relevant.

Inspector's Reasoning and Conclusions

8.24.1. It is reasonably clear that "outer sites" means areas furthest from the City Centre, and no further clarification is required. This part of paragraph 8.18 will not necessarily apply to all of the Areas of Major Change, and the modification suggested would not therefore be appropriate.

8.24.2. The use of a stronger word than "encouraged" in this context would not be appropriate, given the limited control the Council has over the routeing of public transport services. The need for subsidy will be a matter to be considered in each individual case in determining how a developer will satisfy the requirements of the Policy. The affordability of bus services is referred to in paragraph 8.16.

RECOMMENDATION**8.24.3. I recommend no modification to the RDD.****8.25 POLICY 7/7 (FDD) AND POLICY 8/8 (RDD)****Objections**

Railfuture/Transport 2000
Green Property
Network Rail
Transport 2000 Cambridgeshire & West Suffolk
Laing Homes Ltd
Wrenbridge Land Ltd
Taylor Woodrow Developments Limited
Jonathan Larmour
Dr. J. I. Coates

282/2/DEP01/07_P07
337/6/DEP01/07_P07
370/13/DEP01/07_P07
374/9/DEP01/07_P07
708/34/DEP01/07_P07
709/34/DEP01/07_P07
710/34/DEP01/07_P07
776/9/DEP02/08_P08
790/3/DEP02/08_P08

Summary of Objections

- Objection is made to the CGB scheme.
- The whole length of the CGB route should be shown on the Proposals Map.
- Land should be safeguarded unless it is operationally redundant and has no prospect of being used for public transport.
- The St Ives route needs to be safeguarded for a main line railway.

- Transport proposals should not prejudice the development potential of individual land holdings.
- Developments should include road space for bus lanes and bus priority measures on major new routes.
- The bus station should be moved out of the City Centre.

Inspector's Reasoning and Conclusions

8.25.1. Whether or not the CGB scheme goes forward is not a matter either for Cambridge City Council or for this Plan. However, it is appropriate for the Plan to safeguard land not already forming part of the public highway if it is required for the CGB scheme. Cambridgeshire County Council, the promoting authority, have not required any land to be safeguarded along Histon Road or Milton Road, and it is neither necessary nor appropriate for that part of the route to be indicated on the Proposals Map.

8.25.2. All of the former railway line to St Ives within the Plan area is identified on the Proposals Map as being safeguarded for the expansion of HQPT under Policy 8/8. The Local Plan gives no indication of the exact form of public transport, which is a matter for the County Council to determine. It is also for the County Council to determine the line of the CGB scheme which it is promoting. As none of these matters are within the remit of the Local Plan, I do not support any modification in relation to them.

8.25.3. There is no evidence of any land being safeguarded for public transport in the Plan which is not needed for that purpose. However, where land is safeguarded, then it is a likely consequence that the development potential of individual land holdings will be constrained. It is appropriate in such cases for the needs of public transport to be given priority.

8.25.4. It is not necessary to make explicit reference in the Policy to bus priority measures in new developments, as these will be subject to consideration at the detailed planning stage when the layout and configuration of the road system to serve those developments will be determined.

8.25.5. The most appropriate location for a bus station is normally the City Centre, because that is likely to be the most popular destination for a large number of people. There is no evidence before the inquiry of any proposals to relocate the bus station and it would not therefore be appropriate to refer to this possibility in the Plan.

RECOMMENDATION

8.25.6. I recommend no modification to the RDD.

8.26 PARAGRAPH 7.11 (FDD) AND PARAGRAPH 8.19 (RDD)

Objections

Countryside Properties
Martin Thorne
RLW Estates

68/25/DEP01/07_11
761/1/DEP02/08_19
774/5/DEP02/08_19

Summary of Objections

- The feasibility of a station to serve the Addenbrooke's Hospital area should be established between first and second deposit.

- The reference to such a railway station should be reinstated.

Inspector's Reasoning and Conclusions

8.26.1. Paragraph 7.11 of the FDD included a reference to the possibility of a station to serve the Addenbrooke's Hospital area. This reference has been deleted from the RDD, the Council taking the view that there is no strong public transport business case, there is no identifiable means of funding, and the development could significantly harm the environment of the Southern Fringe.

8.26.2. Whilst it is clear that there is some public support for the provision of a station in this location, there is no evidence that any public or private body with responsibility for such matters has the intention or the funds to proceed with such a development. Policies in the Plan should be realistic, and in the absence of any evidence that a proposal for a station to serve Addenbrooke's is likely to come forward during the Plan period there is no justification for any reference to it in the Plan.

RECOMMENDATION

8.26.3. I recommend no modification to the RDD.

8.27 POLICY 7/8 (FDD) AND POLICY 8/9 (RDD)

Objections

The Bursars' Committee of the Cambridge Colleges
Dr. G. E. Rogers
Trumpington Environmental Action Group (TEAG)
Windsor Road Residents

87/30/DEP01/07_P08
377/26/DEP01/07_P08
460/21/DEP01/07_P08
366/68/DEP02/08_P09

Summary of Objections

- The Policy should acknowledge the need to service City Centre sites.
- Access for service vehicles to development sites should not be by existing residential roads if there is an alternative available.
- Access for delivery vehicles should be restricted outside the historic core.

Inspector's Reasoning and Conclusions

8.27.1. Changes at revised deposit stage have removed references in the Plan to limiting access by delivery vehicles to the historic core of the City.

8.27.2. Access for service vehicles to new development sites is a matter for the highway authority, and would have to be considered at the planning application stage. The effect of development on the living conditions of residents in nearby roads could be taken into account at that time.

8.27.3. Whilst new proposals for commercial uses can be required to provide adequate off-street loading facilities, the enforcement of loading restrictions in respect of existing developments is up to the highway authority. The highway authority is also responsible for considering restrictions on the use of the public highway by HGV vehicles, and it is not appropriate to address these matters in the Local Plan.

RECOMMENDATION

8.27.4. I recommend no modification to the RDD.

8.28 PARAGRAPH 7.12 (FDD)

Objections

The Bursars' Committee of the Cambridge Colleges

87/36/DEP01/07_12

Summary of Objections

- The paragraph should be amended to acknowledge the need for essential servicing to the City Centre sites of the University and Colleges.

Inspector's Reasoning and Conclusions

8.28.1. Paragraph 7.12 in the FDD has been deleted, and the reference to limiting access within the historic core of the City does not appear in the RDD.

RECOMMENDATION

8.28.2. I recommend no modification to the RDD.

8.29 POLICY 7/9 (FDD) AND POLICY 8/10 (RDD)

Objections

Cambridgeshire County Council

55/7/DEP01/07_P09

Camstead Homes

55/41/DEP01/07_P09

Shelia Redhead

74/13/DEP01/07_P09

James Development Co. Ltd

131/1/DEP01/07_P09

WM Morrison Supermarkets Plc

378/13/DEP01/07_P09

The House Builders Federation

406/4/DEP01/07_P09

362/8/DEP02/08_P10

Summary of Objections

- Parking standards should conform to the Structure Plan. Standards on joint sites should be harmonised with South Cambridgeshire District Council.
- Impacts should be properly assessed where parking provision is set at low levels. Management of parking permits within the Controlled Parking Zone (CPZ) is also relevant.
- The Policy should contain more detail as to what is meant by "feasible", and references to shared parking should also be included.
- Forecourt car parking in residential areas should be controlled.
- The Policy and text should reflect the advice in PPG 13 paragraphs 35 and 56.
- Planning applications should not be determined solely in terms of the Council's parking standards.

Inspector's Reasoning and Conclusions

8.29.1. Policy P8/5 of the Structure Plan requires parking standards to be set as maximum standards. I am not satisfied that, as drafted, Policy 8/10 and Appendix C fully reflect either this Structure Plan requirement or the advice in PPG13. However, my concerns can be addressed by changes to Appendix C, and I say more about this in Chapter 11.

8.29.2. The Council has acknowledged the need to harmonise standards for cross-boundary sites, but this is more appropriately dealt with in the detailed planning that will take place for the Areas of Major Change. The question of assessing impacts where lower parking levels are proposed is a development control matter. Appendix C notes that residents' parking permits are not provided for new developments within the CPZ.

8.29.3. The Policy no longer refers to the feasibility of providing parking below the standard. If the standards are expressed as maxima, the precise level of parking would be determined at the development control stage. I recommend modifications to Appendix C to delete paragraphs 1.5 and 1.6 as they do not accord with PPG 13 advice.

8.29.4. Although no specific reference is made in the Standards to shared parking, there is nothing there that would prevent the Council from agreeing to this in appropriate circumstances, or that conflicts with Policy P8/5 of the Structure Plan. No further modification of the Plan is needed in this regard.

8.29.5. Planning permission is not normally required for the provision of parking areas in front gardens. The question of providing appropriate screening for such parking is not, therefore, a matter for the Local Plan.

8.29.6. Appendix C indicates that the parking standards set out there should not be exceeded. Given the very severe traffic congestion experienced in Cambridge the Council are entitled to take that view in the Plan, notwithstanding the advice in paragraph 56 of PPG 13, particularly as there is no evidence that the vitality and viability of the City Centre is likely to be harmed as a result.

8.29.7. National policy guidance requires local planning authorities to set car parking standards, and it is an accepted principle that those standards should be applied in considering planning applications. There is, however, nothing in the Policy that would prevent the Council from not applying its standards in any particular case if there were good reasons not to. Any future change to the standards would, as the Council points out, have to be subject to an appropriate level of public consultation.

RECOMMENDATION

8.29.1. I recommend no modification to the RDD.

8.30 PARAGRAPH 7.13, PARAGRAPH 7.14 (FDD) AND PARAGRAPH 8.22 (RDD)

Objections

WM Morrison Supermarkets Plc

406/10/DEP01/07_13

Windsor Road Residents

406/11/DEP01/07_14

366/34/DEP01/07_14

Mrs Penny Heath

366/69/DEP02/08_22

832/7/DEP02/08_22

Summary of Objections

- The Policy and text should be amended to reflect the advice in PPG 13 paragraphs 35 and 56.
- Reduced car parking cannot be implemented without good public transport.
- Private cars should be allowed to enter and park in the City Centre in the evenings.

Inspector's Reasoning and Conclusions

8.30.1. I deal with the points made in the objections by Wm Morrison Supermarkets Plc in section 8.29. Paragraph 7.13 of the FDD does not appear in the RDD.

8.30.2. According to the Council, public transport in the area has improved in recent years and the City and County Councils are working to improve bus services further. However this is a matter outside the remit of this Local Plan. Paragraph 8.22 acknowledges the link between lower levels of private car parking and good public transport accessibility, and no further change to the paragraph is warranted.

8.30.3. There is no evidence that existing car parks cannot cater for demand from people wishing to visit the City Centre for leisure purposes in the evening. The control of on-street car parking is a matter for the highway authority.

RECOMMENDATION

8.30.4. I recommend no modification to the RDD.

8.31 POLICY 7/10 (FDD)**Objections**

Cambridge Preservation Society
Turnstone Estates
Windsor Road Residents

26/39/DEP01/07_P10
47/5/DEP02/08
366/60/DEP02/08

Summary of Objections

- The last sentence of the Policy should be covered by SPD and is not necessary.
- Residents' parking zones should be supported by the Council, and Policy 7/10 of the FDD should be reintroduced into the adopted Plan.

Inspector's Reasoning and Conclusions

8.31.1. Policy 7/10 does not appear in the RDD. The creation of residents' parking zones, which was the subject of Policy 7/10 in the FDD, is not a responsibility of the City Council, and the Policy itself did not address specific land use implications. Its reinstatement in the Plan is therefore unnecessary.

RECOMMENDATION

8.31.2. I recommend no modification to the RDD.

8.32 POLICY 7/11 (FDD) AND POLICY 8/11 (RDD)**Objections**

Cambridge Preservation Society
Windsor Road Residents
Network Rail
Cambridge Cycling Campaign
Highways Agency
Cambridgeshire County Council

26/40/DEP01/07_P11
366/36/DEP01/07_P11
370/38/DEP01/07_P11
437/8/DEP01/07_P11
697/11/DEP01/07_P11
55/42/DEP02/08_P11
55/43/DEP02/08_P11
749/2/DEP02/08_P11
838/7/DEP02/08_P11

Mr N. G. Jackson
Cllr John Durrant

Summary of Objections

- The Policy should include a reference to cyclists.
- The creation of roads through existing residential areas (rat runs) should not be permitted.
- Criterion d of Policy 7/11 is objected to. New developments should be required to mitigate traffic resulting from their own schemes and where practicable minimise additional car traffic in the surrounding area.
- Through roads must be cycle friendly and not produce a barrier to desire lines. Cambridge access roads should not be made a no-go area for non-motorised vehicular traffic.
- New roads should be designed to minimise the use of the trunk road network by local distributor traffic.
- A change is needed to explain what is meant by a proposed road, and bus priority measures should be incorporated where necessary.
- Roads should be designed to give high priority to public transport users.
- Through access should not be restricted if restriction would increase journey length and the number of vehicles using the alternative route.

Inspector's Reasoning and Conclusions

8.32.1. Policy 8/11 of the RDD, formally numbered Policy 7/11, now includes a reference to cyclists.

8.32.2. As now drafted it also requires through access for general motor traffic to be restricted where possible, and the minimisation of additional car traffic in the surrounding area. It would not be practical to prohibit rat runs in the Policy, but the wording goes as far as is possible in allowing this phenomenon to be addressed.

8.32.3. Policies 8/2 and 8/3 of the RDD address the mitigation of the traffic impact of development. Paragraph d of Policy 7/11 (paragraph c of RDD Policy 8/11) is a reasonable requirement that could be met by measures not to increase traffic more than is necessary. National policy guidance on conditions and planning obligations would not permit unfeasible measures to be sought.

8.32.4. Policy 8/11 and paragraph 8.23 require high priority to be given to the needs of cyclists, including safety, and also requires the avoidance of any severance of existing pedestrian or cycle routes. The wording suggested in the objection by Cambridge Cycling Campaign is, however, over-detailed and imposes impractical requirements, and I do not recommend that it is incorporated in the Plan. Whilst the Council accepts that conditions for cyclists are not ideal on many main routes, this Policy goes as far as is reasonable in addressing cyclists' needs. The Policy would not be improved significantly by any further change in respect of non-motorised vehicular traffic.

8.32.5. The effect of traffic on the trunk road network would be a matter to be considered in any TA. However, there is no convincing evidence that a specific requirement in this Policy, for the use of the trunk road by local traffic to be minimised, is necessary.

8.32.6. It is clear that the Policy applies to any new road, and no further explanation is necessary. If a case could be made for the need to include bus priority measures in any particular proposal, then this could be required without an

explicit reference being made in the Policy.

8.32.7. The requirement in the Policy that through access for general motor traffic should be restricted where possible is, in my opinion, worthy of support, given that it is likely to go some way towards encouraging other modes of transport for short journeys. Inevitably, this may result in longer car journeys for those who choose not to adopt an alternative means of transport.

RECOMMENDATION

8.32.8. I recommend no modification to the RDD.

8.33 PARAGRAPH 7.16 (FDD)

Objections

Windsor Road Residents

366/37/DEP01/07_16

Summary of Objections

- More detail is required as to how the impact of new roads is to be assessed, measures to control taxis should be included, and the effect of parked cars on "access only" roads should also be assessed.

Inspector's Reasoning and Conclusions

8.33.1. It would not be appropriate to include in the Plan details as to how traffic impact will be assessed, this being largely a matter for the County Council as highway authority. The control of taxis is also a matter outside the remit of this Plan. The effect of development on the demand for on-street parking would normally be included in any TA, but there is no need for a specific reference to this matter in the Plan.

RECOMMENDATION

8.33.2. I recommend no modification to the RDD.

8.34 PARAGRAPH 8.23

Objections

Cambridgeshire County Council

55/44/DEP02/08_23

Summary of Objections

- New roads should include segregated pedestrian and cycle routes adjacent to the carriageway.

Inspector's Reasoning and Conclusions

8.34.1. Policy 8/11 requires new roads to give high priority to the needs of pedestrians and cyclists, including safety. However it would be overly inflexible to express a view in the supporting text that this should always be done through the provision of segregated routes.

RECOMMENDATION

8.34.2. I recommend no modification to the RDD.

8.35 PARAGRAPH 8.24

Objections

Windsor Road Residents

366/41/DEP02/08_24

Summary of Objections

- The methodology of quantitative assessment will be important; there is a need to control taxis, and to assess the effects of development on on-street parking.

Inspector's Reasoning and Conclusions

8.35.1. The substance of these objections is dealt with in section 8.33.

RECOMMENDATION

8.35.2. I recommend no modification to the RDD.

8.36 OMISSION – AIRPORT

Objections

The objections to this aspect of the Plan are listed in Annex 3.

Summary of Objections

- The Plan should include a policy restricting further aviation development at the Airport.

Inspector's Reasoning and Conclusions

8.36.1. Policy 8/12 of the RDD now provides that aviation development at Cambridge Airport will not be permitted where there would be a significant adverse effect on the environment and residential amenity. Although some objectors seek a complete ban on aviation development, it would not be appropriate to prevent such activity where no significant harm would be caused.

RECOMMENDATION

8.36.2. I recommend no modification to the RDD.

8.37 POLICY 8/12

Objections

The Marshall Group Of Companies
South Cambridgeshire District Council

66/4/DEP02/08_P12
461/14/DEP02/08_P12

Summary of Objections

- The Policy should be worded positively.

- An additional criterion should be added to prevent development that would prejudice the future relocation of the Airport and the redevelopment of the site.

Inspector's Reasoning and Conclusions

8.37.1. The proposal to word the Policy positively would make no practical difference to its meaning, and is therefore unnecessary.

8.37.2. The Airport has been identified in the Structure Plan as a site for future major development. I am not satisfied that this allocation could be prejudiced by aviation development at the Airport that might otherwise be permissible under Policy 8/12 as worded, and it is not therefore necessary to add the extra criterion suggested.

RECOMMENDATION

8.37.3. I recommend no modification to the RDD.

8.38 PARAGRAPH 8.27

Objections

South Cambridgeshire District Council
Anne Campbell
Cllr John Durrant

461/15/DEP02/08_27
768/9/DEP02/08_27
838/13/DEP02/08_27

Summary of Objections

- The Council should not advocate in its Plan the relocation of an operating Airport to another district.
- The paragraph contradicts the Policy, because it says there is no scope for significant development.
- The Plan should acknowledge that the closure of Marshall's and Cambridge Airport will also achieve the aim of freeing the Airport for redevelopment, by adding the words "or closure" after all references to "relocation".

Inspector's Reasoning and Conclusions

8.38.1. Paragraph 8.27 is indicating the City Council's preferred relocation scenario. However, as the relocation site for the Airport is likely to be largely outside the control of the City Council, the second sentence of the paragraph adds nothing of value to the Plan, and should be omitted.

8.38.2. The Policy is worded clearly as to what new aviation development will not be permitted at Cambridge Airport. The third sentence of paragraph 8.27 as drafted expresses the Council's view on the scope for further development at the Airport, and does not contradict the Policy.

8.38.3. The Council has indicated that it is actively working with Marshall of Cambridge and other local authorities to achieve the relocation of Marshall Aerospace and the Airport. It would not therefore be accurate for the Plan to imply that the Council seeks the closure of the Airport.

RECOMMENDATION

8.38.4. I recommend that the RDD be modified by the deletion from paragraph 8.27 of the second sentence of that paragraph.

8.39 POLICY 7/12 (FDD)**Objections**

Cambridge Preservation Society
Orange PCS Ltd
BT Plc

26/41/DEP01/07_P12
242/1/DEP01/07_P12
376/16/DEP01/07_P12

Summary of Objections

- "Telecommunications" should be added before "development".
- Criterion (a) should be deleted and criterion (c) simplified.

Inspector's Reasoning and Conclusions

8.39.1. The modification suggested to criterion (c), to include a specific reference to ICNIRP guidelines, would not alter the sense of the Policy, which already requires compliance with national guidelines. It is therefore unnecessary.

8.39.2. The other modifications sought in these objections were made at revised deposit stage.

RECOMMENDATION

8.39.3. I recommend no modifications to the RDD in response to these objections.

8.40 POLICY 7/13 (FDD)**Objections**

Cambridge Preservation Society

26/42/DEP01/07_P13

Summary of Objections

- The Policy is too negative.

Inspector's Reasoning and Conclusions

8.40.1. This Policy has been deleted from the Plan.

RECOMMENDATION

8.40.2. I recommend no modification to the RDD.

8.41 POLICY 8/16**Objections**

The objections to this aspect of the Plan are listed in Annex 3.

Summary of Objections to Policy 8/16

- The final paragraph weakens the Policy and should be clarified.
- The Policy is unreasonable as it goes beyond the current Building Regulations.
- The requirement for on-site renewable power generation is unjustifiable.

- The threshold should be raised to 50 dwellings, or 1850 square metres.
- The Policy does not reflect guidance in PPS 22.
- The Policy should apply to refurbishments, and the wording should be more robust and go beyond Part L of the Building Regulations.

Pre-Inquiry Changes: SC8. 01

Objections

The objections to this Pre-Inquiry change are listed in Annex 3.

Summary of objections to Pre-Inquiry Change SC8.001

- The Policy requirements are not practical.
- The Policy should not apply where significant efforts to maximise energy efficiency have been demonstrated, or where there are exceptional site considerations.
- The Policy should apply to refurbishment as well as new build.
- The Policy should not apply to small developments.

Inspector's Reasoning and Conclusions

8.41.1. The Council has proposed in Pre-Inquiry Change SC8.01 that this Policy should be deleted and replaced with a policy solely dealing with renewable energy in major new developments. I support the deletion of the Policy, which seems to me to be unreasonable to the extent that it imposes more onerous requirements than the Building Regulations.

8.41.2. Turning now to the Policy proposed in the Pre-Inquiry Change, PPS 22 advises that local planning authorities may adopt policies requiring a percentage of the energy to be used in new developments to come from on-site renewable energy sources. However, policies should ensure that such a requirement is applied only where the installation of renewable energy generation equipment is viable given the type of development proposed, its location and design. The Companion Guide to PPS 22 advises that the proportion of renewable energy that it would be feasible to generate within developments would need to be explored with the development industry before specific targets are set.

8.41.3. The principle of what is proposed by the Council accords with the advice in PPS 22, and I support the inclusion of a policy dealing with this matter in view of the importance the Government places on the development of renewable energy in the reduction of UK carbon dioxide emissions. However, there is no evidence available to the inquiry as to the viability of requiring either the installation of renewable energy generation equipment or the use of passive solar design techniques, and there appears to have been no discussion with the development industry as to the feasibility of the target set. Because of this, I find the requirements of the proposed Policy to be stated in too inflexible a manner. I therefore recommend a modification to allow the requirements of the Policy to be relaxed if full compliance would not be viable.

8.41.4. Concern was expressed by one objector as to the potential costs of the requirements in the Policy, its possible impact on housing delivery rates, and whether the Council's officers possess the necessary technical knowledge to apply the Policy. Bearing in mind the importance of renewable energy, these concerns do not carry sufficient weight to lead me to recommend any further modification. However, the Council will need to monitor the application of the Policy in practice, with particular regard to its effect on housing delivery. The Council will also need

to ensure that it has access to the relevant technical knowledge to enable it to apply the Policy in a timely manner, but this is a matter of resource management and does not affect the merits of the Policy.

8.41.5. The Policy allows passive solar design to be used to satisfy its requirements. Some objectors argue that the Policy requirements should also be relaxed if energy efficiency is maximised through design and construction. There is insufficient evidence to indicate the extent to which this might be comparable to the provision of on-site renewable energy generation, and I do not therefore recommend it. However, the Council may wish to consider in the preparation of its further guidance whether some allowance should be given for energy efficiency maximisation other than passive solar design.

8.41.6. The imposition of any threshold in a policy is inevitably somewhat arbitrary. The Council have chosen to adopt as a threshold for the application of this Policy the definition of major development contained in Article 8 of the Town and Country Planning (General Development Procedure) Order 1995. This is, in my view, a reasonable approach, and in addition the modification I recommend would allow viability to be taken into account. Finally, the application of the Policy to refurbishment as well as new build developments goes beyond what is advised in PPS 22.

RECOMMENDATION

8.41.7. I recommend that the RDD be modified as follows:

a) Incorporate SC8.001.

b) Add the following sentence at the end of Policy 8/16 as recommended to be modified:

These requirements may be relaxed if it can be clearly demonstrated that to require full compliance would not be viable.

8.42 PARAGRAPH 8.41

Objections

Pre-Inquiry Changes: SC8.002 and SC8.003

The Chancellor, Masters and Scholars of the University of Cambridge

33/9/DEP04/08_41

Summary of Objections

- In line 1 of paragraph 8.41 the word "could" should be replaced by the word "can", to provide greater certainty.

Inspector's Reasoning and Conclusions

8.42.1. Paragraph 8.41 as proposed to be changed in SC8.002 explains what technologies would be regarded as renewable energy, and gives further explanation on passive solar design. It is a necessary consequence of the Pre-Inquiry Change proposed to Policy 8/16. It is clear, from paragraph 8.41 as proposed to be changed, what forms of renewable energy are acceptable to the City Council. The change suggested by the objector would add little to the Plan, and I do not support it.

8.42.2. Pre-Inquiry Change SC8.003 proposes changes to paragraph 8.42, also consequential on the changes proposed to Policy 8/16, and would add clarity

to the Plan.

RECOMMENDATION

8.42.3. I recommend that the RDD is modified by the incorporation of SC8.002 and SC8.003.

8.43 PARAGRAPH 8.43

Objections

Pre-Inquiry Changes: SC8.004

The House Builders Federation

362/5/DEP04/08_43

Summary of Objections

- The requirements of Policy 8/16 are not practicably deliverable.

Inspector's Reasoning and Conclusions

8.43.1. I deal with this objection in section 8.41.

8.43.2. The Council's Pre-Inquiry Change is consequential upon its proposed change to Policy 8/16, and explains the requirements on developers to show how they have complied with the Policy. I support it as it aids understanding of the Policy.

RECOMMENDATION

8.43.3. I recommend that the RDD is modified by the incorporation of SC8.004.

8.44 PARAGRAPH 8.44

Objections

Turnstone Estates

47/6/DEP02/08_44

Pre-Inquiry Changes: SC8.005

The Chancellor, Masters and Scholars of the University of Cambridge

33/10/DEP04/08_44

Summary of Objections to Paragraph 8.44

- The Plan should require a "good" Ecohomes or BREEAM rating, not the highest.

Summary of Objections to Pre-Inquiry Changes SC8.005

- Paragraph 8.44 should be retained. If developments maximise energy efficiency from sustainable design and construction, the requirements for on-site power generation should be relaxed.

Inspector's Reasoning and Conclusions

8.44.1. The Council proposes in SC8.005 to delete paragraph 8.44 as it appears in the RDD, and there will be no references to the ratings referred to in the objection.

8.44.2. I support the deletion of paragraph 8.44 as the use of energy efficient construction is largely a matter for the Building Regulations. I deal with the issue of making an allowance for energy efficiency maximisation in section 8.41. Pre-Inquiry Change SC8.006 proposes a new paragraph explaining the Council's intention to produce further guidance on the operation of Policy 8/16, and it adds clarity to the Plan.

RECOMMENDATION

8.44.3. I recommend that the RDD is modified by the incorporation of SC8.005 and SC8.006.

8.45 POLICY 8/17

Objections

British Wind Energy Association

777/2/DEP02/08_P17

Pre-Inquiry Changes: SC8.007

Summary of Objections

- The word "adverse" should be inserted in the Policy before "impacts".
- Clause b should be worded more positively.

Inspector's Reasoning and Conclusions

8.45.1. The Council's Pre-Inquiry Change would insert "adverse" in the Policy, making it clear that only harmful impacts need to be minimised. The objector's suggested change to clause b of the Policy would make no difference to its overall meaning, and is unnecessary.

RECOMMENDATION

8.45.2. I recommend that the RDD is modified by the incorporation of SC8.007.

8.46 PARAGRAPH 8.46

Objections

Cambridgeshire County Council
Future Energy Solutions

55/47/DEP02/08_46
801/13/DEP02/08_46
801/14/DEP02/08_46

Pre-Inquiry Changes: SC8.008

Summary of Objections

- The paragraph should refer to PPS22 and to regional targets for renewable energy provision.
- The paragraph should reflect that the Government target for renewable energy provision by 2020 is aspirational.

Inspector's Reasoning and Conclusions

8.46.1. The Regional Spatial Strategy for the East of England will, when it is adopted, form part of the development plan, and there is no need to repeat in this Plan any targets set out there.

8.46.2. The Council's approach in drafting the Plan has generally been not to make specific reference to Government advice in the interests of keeping the Plan relatively short. Such a reference as proposed here would add little to the Plan, and is therefore unnecessary.

8.46.3. Pre-Inquiry Change SC8.008 would clarify that the Government's target for renewable energy for 2020 is aspirational, and I support it as a more accurate statement of the position.

RECOMMENDATION

8.46.4. I recommend that the RDD is modified by the incorporation of SC8.008.

8.47 PARAGRAPH 8.48

Objections

The Wildlife Trust

382/22/DEP02/08_48

Summary of Objections

- The words "and other emissions" should be inserted in the first sentence.

Inspector's Reasoning and Conclusions

8.47.1. This proposed amendment is intended to compensate for the deletion of paragraph 8.49, also proposed by this objector. As I do not support the deletion of paragraph 8.49, this further change would add nothing to the Plan.

RECOMMENDATION

8.47.2. I recommend no modification to the RDD.

8.48 PARAGRAPH 8.49

Objections

The Wildlife Trust
British Wind Energy Association

382/23/DEP02/08_49
777/3/DEP02/08_49

Summary of Objections

- This paragraph endorses the sacrifice of ecological interests to renewable energy schemes.
- The paragraph should be more positive about renewable energy developments in the Green Belt.

Inspector's Reasoning and Conclusions

8.48.1. PPS22 does not rule out renewable energy schemes in internationally, nationally or locally designated sites, and the contents of this paragraph reflect that position.

8.48.2. The text of the paragraph also reflects the advice in PPS22 on renewable energy developments in the Green Belt.

RECOMMENDATION

8.48.3. I recommend no modification to the RDD.

8.49 POLICY 8/18

Objections

Windsor Road Residents
The Wildlife Trust
Anglian Water Services Limited

366/43/DEP02/08_P18
382/24/DEP02/08_P18
782/9/DEP02/08_P18

Summary of Objections

- The “knock-on” effects of new development on infrastructure serving existing developments needs consideration.
- There should be a policy on water efficiency and sustainable water resources.
- The Policy should require better communication from developers of major schemes or where new infrastructure is required.

Inspector’s Reasoning and Conclusions

8.49.1. The Policy already requires the “knock-on” effects of development on existing infrastructure to be considered, and the provision of additional infrastructure to serve the development if existing infrastructure is inadequate.

8.49.2. There is no Government advice on including water efficiency policies in Local Plans. However, these matters are referred to in the supporting paragraphs to Policy 3/1 and in the Council’s Sustainable Development Guidelines. Under the circumstances it is reasonable for the Council to decide not to include such a policy in the Plan.

8.49.3. Communication between developers and infrastructure providers will be essential to the implementation of the Policy, but is a matter for implementation rather than something that needs mentioning in the Plan itself.

RECOMMENDATION

8.49.4. I recommend no modification to the RDD.

8.50 PARAGRAPH 8.50

Objections

Cambridgeshire County Council

55/48/DEP02/08_50

Summary of Objections

- The paragraph should *require* the use of sustainable drainage systems.

Inspector’s Reasoning and Conclusions

8.50.1. Policy 9/3 (m) indicates that (SUDS) should be used in the urban extensions where practicable, but there is no other policy requirement for such

systems. However, that would not prevent the Council from requiring SUDS in other developments if appropriate, and the Council's Sustainable Development Guidelines also support the use of SUDS. Under these circumstances, the change proposed in the objection would not add significantly to the Plan.

RECOMMENDATION

8.50.2. I recommend no modification to the RDD.

8.51 PARAGRAPHS 7.24 – 7.27 (FDD) AND 8.53 – 8.56 (RDD)

Objections

Cambridgeshire County Council	55/42/DEP01/07_24
Countryside Properties	68/11/DEP02/08_53
Countryside Properties	68/26/DEP02/08_54
The Marshall Group Of Companies	66/14/DEP01/07_26
Cambridgeshire County Council	55/49/DEP02/08_55
Countryside Properties	68/27/DEP02/08_55
Cambridgeshire County Council	55/50/DEP02/08_56
Countryside Properties	68/28/DEP02/08_56
Addenbrooke's NHS Trust	399/22/DEP02/08_56
Countryside Properties/Liberty Property Trust	837/16/DEP02/08_56

Pre-Inquiry Change: CCC306

Summary of Objections

- There should be a stronger statement of the need for major waste management facilities and household waste recycling centres (HWRCs). Reference should be made to "at least" two HWRCs.
- There should be additions which set out the fact that the Waste Local Plan allocates Cambridge East as an Area of Search for a major waste facility
- Waste is properly dealt with in the Waste Local Plan, and this paragraph should be omitted.
- Supports the investigation of the potential of land at Cambridge Airport for a major waste management facility, on the basis that the exercise may conclude that it ought to be located elsewhere.
- It should be made plain that sites 9.02 and 9.10 are not appropriate locations for the HWRC

Inspector's Reasoning and Conclusions

8.51.1. I consider that the Plan should include a section on waste, explaining the relationship with the Waste Local Plan, and making it clear that proposals for waste development will also need to be considered against the City's policies in this plan. However, it is the Waste Local Plan which is the prime source of information and policy on waste matters and I consider that, subject to some of the changes made at Redeposit Draft, this Plan should not be augmented in the way that the County Council seeks. It is not the place of this Local Plan to amplify or interpret the provisions of the Waste Local Plan

8.51.2. However, the present Waste Local Plan does not identify specific sites for many waste facilities. The requirements for such facilities are being considered in the emerging Cambridgeshire and Peterborough Minerals and Waste Development Plan. That is the relevant document to determine the number and

siting of facilities, and area specific references in the Local Plan should be deleted unless they come from the existing Waste Local Plan.

8.51.3. There is a Pre-Inquiry Change (CCC306) which corrects a reference to Waste Local Plan Policy WLP18 from WLP17. This is incorporated in recommendation (b) below.

RECOMMENDATION

8.51.4. I recommend that the RDD be modified as follows:

- a) By the deletion of the penultimate sentence of paragraph 8.54.**
- b) By the amendment of the first sentence of paragraph 8.55 to read "There may be potential to provide a major waste management facility as part of a major new development (see Waste Local Plan Policy WLP18)".**
- c) By the deletion of the second sentence from paragraph 8.55.**
- d) By the deletion of the third and fourth sentences from paragraph 8.56.**
- e) By the addition of a new paragraph 8.57, to read "The requirements for new facilities are being considered in the emerging Cambridgeshire and Peterborough Minerals and Waste Development Plan, which is the relevant document to establish the number and siting of facilities" and then to incorporate the final sentence of present paragraph 8.56.**

9. AREAS OF MAJOR CHANGE

9.1 TITLE

Objections

Cambridgeshire County Council
South Cambridgeshire District Council

55/45/DEP01/AAP
461/14/DEP01/AAP

Summary of Objections

- "Traffic Impact Assessments" should read "Transport Impact Assessments".
- Area Development Frameworks and Master Plans should be Supplementary Planning Guidance.

Inspector's Reasoning and Conclusions

9.1.1. The Chapter which gave rise to these objections to the FDD has been re-written, and relevant wording changes have been made to the Plan's Glossary.

RECOMMENDATION

I recommend no modification to the RDD.

9.2 WHOLE CHAPTER

Objections

English Heritage
Windsor Road Residents
Teresa Brett
Mr Nick Jackson
Catherine Millhouse
Martin Thompson

338/25/DEP02/09
366/44/DEP02/09
729/2/DEP02/09
749/1/DEP02/09
779/1/DEP02/09
797/1/DEP02/09

Summary of Objections

- There is no need for Cambridge to grow as much as planned. Too much development is proposed and this will put a serious strain on the City. Empty houses and disused land should be developed instead of Green Belt areas.
- For each Area of Major Change there should be reference to the historic environment.
- More detail is needed about implementation.

Inspector's Reasoning and Conclusions

9.2.1 The growth requirements are set by the Structure Plan following on from regional guidance. The preparation of these documents allowed the suitability of the City to accept the level of growth to be assessed. It is not for me to repeat these exercises. The UCS takes account of the potential of the built-up area to provide more housing.

9.2.2 There is a Chapter on implementation in the Plan. Otherwise I deal

elsewhere with questions of enforcement. Policies 3/4 and 4/8 deal with archaeology and historic landscape.

9.2.3 Mr Jackson's objection also contains objections to the omission of a policy on car parking, and to retail provision in East Cambridge. I consider the latter below in paragraph 9.17.21 and the former above in Section 8.1.

RECOMMENDATION

I recommend no modification to the RDD.

9.3 OBJECTIVES

Objections

South Cambridgeshire District Council

461/17/DEP02/09

Summary of Objections

- A new objective is suggested, concerning the quality and sustainability of major developments.

Inspector's Reasoning and Conclusions

9.3.1 This is sufficiently covered by Policies 9/3 and 3/1.

RECOMMENDATION

9.3.2 I recommend no modification to the RDD.

9.4 PARAGRAPH 9.1

Objections

Ashwell (Barton Road) Limited

659/5/DEP02/09_01

Summary of Objections

- The Barton Road omission site should be treated as an Area of Major Change.

Inspector's Reasoning and Conclusions

9.4.1. I conclude in section 5.50 of this report that this land should not be allocated for development. In that case designation as an Area of Major Change is not appropriate.

RECOMMENDATION

9.4.2. I recommend no modification to the RDD.

9.5 PARAGRAPH 9.2

Objections

Windsor Road Residents

366/72/DEP02/09_02

Summary of Objections

- More detail is needed about implementation and enforcement.

Inspector's Reasoning and Conclusions

9.5.1 There is a Chapter on implementation in the Plan. Otherwise I deal elsewhere with questions of enforcement.

RECOMMENDATION

9.5.2 I recommend no modification to the RDD.

9.6 PARAGRAPH 9.3

Objections

Windsor Road Residents
Trumpington Environmental Action Group (TEAG)

366/45/DEP02/09_03
460/22/DEP02/09_03

Summary of Objections

- Maximum limits should be specified for the dwelling capacities of Areas of Major Change.

Inspector's Reasoning and Conclusions

9.6.1 Master Plans are quite capable of determining the precise numbers of dwellings for the Areas of Major Change. If harm or over-development is likely because of a particular level of development, the number of dwellings proposed can be adjusted.

RECOMMENDATION

9.6.2 I recommend no modification to the RDD.

9.7 POLICY 8/1 AND PARAGRAPH 8.6 (FDD)

Objections to Policy 8/1

The objections to this aspect of the plan are listed in Annex 3.

Objections to Paragraph 8.6

Windsor Road Residents
Addenbrooke's NHS Trust

366/66/DEP01/08_06
399/25/DEP01/08_06

Pre-Inquiry Changes: SC9.005

The Chancellor, Masters and Scholars of the

Summary of Objections

- The Plan does not show anticipated numbers of dwelling completions in the urban extensions or whether these areas are readily available. Too much weight is given to SPG.
- There is too little explanation of the parties which would be involved in master planning work.
- The proposed scale of development and loss of Green Belt is too great.
- The treatment of North-West Cambridge should accord with the Structure Plan.
- An over-complex hierarchy of further guidance could slow development land coming forward.
- An AAP should be prepared for land west of Trumpington Road.
- There is a need for a new flagship research and technology park.
- More detail is necessary regarding the mechanism and timing of effective public consultation.

Inspector's Reasoning and Conclusions

9.7.1 The objections about the scale of development, and effective public consultation, are concluded upon above and below respectively.

9.7.2 Several of the other objections have effectively been answered in whole or in part by the re-writing of the sections of the Plan dealing with Areas of Major Change, and by other developments since the objections were made.

9.7.3 Policy 9/1 in the RDD identifies parties who are likely to be involved in the preparation of further guidance for Areas of Major Change, and includes South Cambridgeshire District Council. There is no suggestion that some development interests would be given too prominent a role. North-West Cambridge is one of the Areas of Major Change for which further guidance is to be prepared. Land west of Trumpington Road has been the subject of further work, as required by the Structure Plan, and this work has led to the decision that the land should not be identified for development. Indicative dwelling capacities are given for each Area of Major Change. The steps necessary to make the areas available are explained. I deal elsewhere with objections questioning the realism of developing the Areas of Major Change and achieving the required housing supply.

9.7.4 The criticism that the Plan does not ensure that all necessary development will be delivered in the Plan period has some justification (see section 7.5 above). However it is not practical to delay adoption of the Plan whilst additional suitable employment land is identified. Instead, therefore, it will be necessary for the Council to carry out close monitoring of the supply of employment land and if necessary consider the need to bring forward in its Development Plan Documents either other sites or another mechanism for meeting any likely shortfall, as required by Structure Plan Policy P1/4.

9.7.5 Some objectors argue that the preparation of further plans will delay development. The Structure Plan calls for Master Plans or Design Frameworks to be prepared for all individual sites to be released from the Green Belt. These and other Areas of Major Change are complex, and for the most part large, sites. It is right that the RDD should contain a policy concerning further guidance to be produced for Areas of Major Change. The Policy and its supporting text provide a

flexible approach to the nature of the guidance to be produced. It would not necessarily be in the form of SPD, but there will be consultation on any further guidance prepared. I comment further in the subsequent sections of this Chapter of my report.

RECOMMENDATION

9.7.6 I recommend no modification to the RDD as a result of these objections.

9.8 POLICY 9/1 AND PARAGRAPHS 9.5-9.10 (RDD)

Objections to Policy 9/1

The objections to this aspect of the plan are listed in Annex 3.

Objections to Paragraphs

Martin Thorne	761/2/DEP02/09_05
Addenbrooke's NHS Trust	399/24/DEP02/09_06
Countryside Properties/Liberty Property Trust	837/18/DEP02/09_06
	837/23/DEP02/09_06
Addenbrooke's NHS Trust	399/25/DEP02/09_07
South Cambridgeshire District Council	461/18/DEP02/09_07
Countryside Properties/Liberty Property Trust	837/19/DEP02/09_07
	837/22/DEP02/09_07
Windsor Road Residents	366/73/DEP02/09_08
Addenbrooke's NHS trust	399/26/DEP02/09_08
Countryside Properties/Liberty Property Trust	837/20/DEP02/09_08
Addenbrooke's NHS Trust	399/27/DEP02/09_09
Countryside Properties/Liberty Property Trust	837/21/DEP02/09_09

PRE-INQUIRY CHANGES:SC9.001-SC9.008

Objections to Pre-inquiry changes

The Chancellor, Masters and Scholars of the University of Cambridge	33/4-8/DEP04
E. P. Southern	540/2/DEP04/09_08

Summary of Objections

- There should be an indicative timetable for the production and adoption of each guidance document.
- For North-West Cambridge, a Master Plan is needed now. The University's Master Plan should be developed as the further guidance for the area.
- The Policy and supporting paragraphs are too vague and all-embracing. They should specify what further guidance is necessary for each area. Little more is needed for the Southern Fringe.
- The Bell School site should be exempt from the requirement for further guidance.
- For the Northern Fringe, there should be a cross-reference to Policy 9/6.
- Local Development Documents are policy documents, not merely guidance.

- More detail is necessary regarding the mechanism and timing of effective public consultation.

Inspector's Reasoning and Conclusions

9.8.1 The Council's response to the first of the above objections is that the knowledge of what further guidance is necessary is insufficiently advanced to allow of the formulation of a list of guidance needed per area, what the guidance would involve, and a timetable for the production and adoption of the guidance. In this situation, I do not recommend the inclusion of a timetable in the Plan. I note that the Council refers to the LDS as a better source of such information. The preparation of the LDS is a matter for the Council.

9.8.2 In relation to the Southern Fringe, the advanced state of preparation of the ADF for this area has mitigated the concerns of some major objectors. The ADF is being prepared in conjunction with landowners/developers who are objectors. At the time of the inquiry Addenbrooke's were to submit a planning application in spring 2006 accompanied by a Master Plan. These documents meet the requirements of the Structure Plan and of Policy 9/1. No additional guidance is looked for or intended by the Council. I conclude that no changes to the Plan should be made as a result of these objections.

9.8.3 In relation to the Bell School site, Policy 9/1 is a general policy and should not be encumbered with site specific references. The progress on planning the Southern Fringe suggests that there is no need for the Bell School site to be specifically exempted in the Policy wording, particularly as the proposed treatment of the Addenbrooke's intended application (see above) indicates that the Council is applying Policy 9/1 with the flexibility written into the Policy and its supporting material.

9.8.4 The third sentence of the Policy permits limited development to go ahead in the absence of further guidance, subject to certain tests. The tests, and the wording of the Policy, would not prevent the provision of infra-structure for the development of Chesterton Sidings from going ahead before the availability of the Master Plan for the Northern Fringe. There is no need for the Policy to contain a cross-reference to the Northern Fringe section of the Plan.

9.8.5 I deal with the University's objections, and SC9.001-SC9.008 which led to them, in section 9.22 below.

9.8.6 The Local Plan should not be too detailed. It is not the place to set out the Council's consultation procedures on the further guidance regarding Areas of Major Change. The Council should use other means of making its procedures known to the public. The Planning Portal exists to help the public understand and use the planning system (see paragraph 10.2.4 of this report). RDD Paragraph 1.24 explains the position regarding SPG and SPD as far as Cambridge is concerned.

RECOMMENDATION

9.8.7 I recommend the modification of the RDD by the incorporation of SC9.001-9.008.

9.9 POLICY 4/10 (FDD)

Objections

The objections to this aspect of the plan are listed in Annex 3.

Summary of Objections

- Phasing is unnecessary. Arbitrary phasing should be avoided.
- The Local Plan itself should indicate the phasing of each urban extension, rather than leaving it for later documents. This is because of the urgency of meeting the housing requirement, which might call for the allocation of alternative sites.
- The Councils must take the lead in managing the demand for car travel into and within Cambridge. Measures must be realistic and must follow detailed studies of traffic generation and impact.
- The Policy needs strengthening. There is no reference to working with South Cambridgeshire.
- Objectors mention individual sites or road schemes which should be allocated or upon which sites are dependent.

Inspector's Reasoning and Conclusions

9.9.1. The Council agrees that it would be wrong to introduce arbitrary phasing and has deleted Policy 4/10 in favour of a new phasing policy, Policy 9/2, and more detailed phasing for individual Areas of Major Change. The Plan therefore includes an indication of the phasing and dwelling numbers for each urban extension. Some form of phasing policy is required, because building substantial numbers of houses on some sites without the necessary infra-structure would cause harm. Therefore the houses should await the infra-structure provision. The RDD is clear in this matter and does not need to be strengthened. Joint working with other authorities and parties is not ignored

9.9.2. I deal with meeting the housing requirement in Chapter 5 above, and elsewhere in this report I consider individual sites. Policy 10/2 is the monitoring Policy in the RDD.

9.9.3. Sub-section (b) of Policy 4/10, concerning the management of demand for car travel, has been omitted from Policy 9/2 but the topic is included in the reasoned justification for the latter Policy. I comment below on this and related matters. However the suggestion of a policy statement on restrictions on car ownership in some or all housing is not appropriate in view of existing and potential parking problems in Cambridge. Such restrictions are a matter for consideration at the detailed stage, when circumstances particular to individual proposals can be assessed. Widespread or general restrictions would be onerous.

9.9.4. In the context of an urgent housing requirement, there is insufficient evidence for me to conclude that development of Areas of Major Change in north and east Cambridge should await the widening of the A14 before commencing (see also paragraph 9.17.25 below).

9.9.5. Previously developed land is not singled out for preferential treatment as far as contributing to necessary infra-structure is concerned. The Plan taken as a whole does not require green field sites to await the development of all previously developed land before they can be released.

9.9.6. Distinctions between Areas of Major Change and urban extensions are too small to warrant explanation in a succinct document.

9.9.7. I deal elsewhere with enforcement and penalties for failing to provide infra-structure.

RECOMMENDATION**9.9.8. I recommend no modification to the RDD.****9.10 POLICY 9/2 AND PARAGRAPH 9.11****Objections to Policy 9/2**

The objections to this aspect of the plan are listed in Annex 3.

Objections to Paragraph 9.11

The House Builders Federation

362/16/DEP02/09_11

Summary of Objections

- Policy 4/10 should be reinstated.
- Measures to manage the demand for car travel could delay development.
- Transport assessment for the whole City is needed. Others object that assessments can be left to individual planning applications.
- The Policy does not show that the housing requirement can be met.
- Objections are made in relation to specific sites and road proposals.
- The Policy focuses only on transport infra-structure.
- More detail is needed in the Policy and supporting text.

Inspector's Reasoning and Conclusions

9.10.1. There is no need to reinstate Policy 4/10 from the FDD because there is sufficient guidance in Policy 9/2 and its reasoned justification. Other parts of the Plan show how the housing requirement is to be met. However there is insufficient information available to permit the annual dwelling production from each Area of Major Change to be shown in the Plan. Other parts of the Plan contain policies for the provision of forms of infra-structure other than transport infra-structure.

9.10.2. This Policy is a general policy and is not the place for referring to individual sites and Areas of Major Change. I consider the site specific objections below, in relation to the Phasing Table of the RDD. I can say here however that no agency has a proposal for an eastern and southern ring road for Cambridge, and it would therefore be wrong for the Plan to include such a scheme. Monsanto suggest that the Policy should be reworded to refer to planning applications for, and the transport impacts of, development in each of the Areas of Major Change. A similar approach is recommended by Network Rail. However for reasons given below, concerning the Phasing Table, I consider that the change should not be made. In brief, it is necessary to have regard to relevant Structure Plan policies, and to assess the cumulative impacts of developments rather than merely the effects of individual sites.

9.10.3. On the subject of transportation and traffic, the level of detail in the RDD is appropriate to the state of knowledge at the time of the inquiry. The Plan already indicates through the Phasing Table the likely phasing of development, taking account of infra-structure requirements. Developers and others involved in bringing forward sites for development in my view have sufficient information to enable

them to undertake preparatory work to avoid delays.

9.10.4. The County Council is undertaking a County Strategic Transportation Study. This will assess the traffic and transport impacts of proposed development in and outside the City, providing the kind of assessment sought by some objectors. It is sufficient to leave it to the relevant authorities to carry out, and act upon, the study. It seems to me that this study should give the Council the information it needs to assess in more detail when the Areas of Major Change can be developed and how the necessary transport infra-structure will be secured. Site capacities too will be capable of assessment in more detail. Provision of transport infra-structure is a matter of public interest and so it is not necessary to specify for whom the provision is necessary.

9.10.5. The County's study will therefore assist in the preparation of TAs to be provided with planning applications. I do not see that the Policy will delay the process overall in the future. However the scale of development is such that account should be taken of possible effects both in terms of traffic generation and impacts, and requirements for highway and public transport infra-structure. It is right that this should include the multi-agency approach to minimising demand for car travel in this busy City, envisaged in paragraph 9.12.

9.10.6. For similar reasons as those given in the preceding paragraph, the first paragraph of Policy 9/2 should remain. The risk with a piecemeal approach to all Areas of Major Change is that the early developments would take up the infra-structure capacity available, placing the entire burden of provision of additional needed infra-structure on later proposals, which might not be able to finance them. The Policy does enable development to go ahead if it can be shown that its early development would not cause unacceptable traffic impacts.

9.10.7. The wording of Policy 9/2 and its supporting paragraphs gives the Council the necessary control over development without the need for more detail or stronger wording. The Areas of Major Change have emerged from the Structure Plan, which did not put them forward lightly but was itself the product of much analysis, following yet earlier work. It appears to me that there is a sound foundation for the choice of the Areas of Major Change. Attempts to define many of the terms used in this part of the Plan would result in an over-prescriptive document containing too much detail.

RECOMMENDATION

9.10.8. I recommend no modification to the RDD.

9.11 PARAGRAPH 4.20 (FDD)

Objections

Taylor Woodrow Developments Limited
Cambridge Preservation Society
Dr. G. E. Rogers
Bidwells Property Consultants

2/4/DEP01/04_20
26/26/DEP01/04_20
377/16/DEP01/04_20
396/29/DEP01/04_20

Summary of Objections

- There are unsubstantiated and inaccurate statements in the paragraph.
- Previously developed land should be released before Green Belt land.

Inspector's Reasoning and Conclusions

9.11.1. Given the scale and urgency of the housing requirement, together with the delays inherent in bringing forward previously developed land in East Cambridge, some Green Belt land has to be released early, as the Structure Plan recognises.

9.11.2. Paragraph 4.20 has been deleted from the RDD. Accurate Structure Plan references are given in paragraph 1.7. There is no reliance on dwelling production from the Cambridge Airport site.

RECOMMENDATION

9.11.3. I recommend no modification to the RDD.

9.12 PARAGRAPH 4.21 (FDD)**Objections**

Bidwells Property Consultants

396/30/DEP01/04_21

Summary of Objections

- The reference to SPG demands explanation.

Inspector's Reasoning and Conclusions

9.12.1. This paragraph has been omitted from the RDD.

RECOMMENDATION

9.12.2. I recommend no modification to the RDD.

9.13 PARAGRAPH 9.12**Objections**

Windsor Road Residents
South Cambridgeshire District Council
Sohnius & Perry Ltd

366/49/DEP02/09_12
461/20/DEP02/09_12
784/8/DEP02/09_12

Summary of Objections

- Cambridge Airport should be added as a site where land will be safeguarded for long-term development.
- The paragraph should be modified to specify that local convenience shops and small Class A3 facilities should proceed in step with housing development.
- A stronger and more detailed text should be provided.

Inspector's Reasoning and Conclusions

9.13.1. The Airport is not a site for safeguarding. It is not being developed early because of the need for major relocations. If it became available earlier it would be a priority for development.

9.13.2. I deal above with the question of strengthening Policy 9/2 and its supporting text. There is a battery of policies dealing with the provision of services and facilities. It is for more detailed work to decide what should be provided and where.

9.13.3. Policy 9/3 (j) requires the development of urban extensions to include a mix of uses within Classes A1-A3. On the face of it this should meet the objection regarding provision of such uses. The Council sees these facilities being provided in local centres, but the objector wishes them to locate throughout housing areas. Such uses often struggle to survive, and policy requirements to provide land or buildings in scattered locations would not necessarily secure occupation by the relevant types of business. The change sought should not be made.

RECOMMENDATION

9.13.4. I recommend no modification to the RDD.

9.14 TABLE 9.1 (PHASING TABLE)

Objections

Cambridgeshire County Council	55/53/DEP02/09_T01
The Marshall Group Of Companies	66/7/DEP02/09_F01
The House Builders Federation	362/17/DEP02/09_T01
Windsor Road Residents	366/50/DEP02/09_T01
South Cambridgeshire District Council	461/21/DEP02/09_T01
	461/22/DEP02/09_F01
	461/23/DEP02/09_F01
Anne Campbell	768/11/DEP02/09_F01
Trumpington Meadows Land Company	798/26/DEP02/09_F01

Pre-Inquiry Changes: SC9.009

Transport 2000 Cambridgeshire & West Suffolk	374/5/DEP04/09
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Summary of Objections

- The object of the Table is unclear. It would be a good place to show dwelling capacities. Infra-structure costs will be very high.
- Various site specific objections are made in relation to the Table and Policy 9/2, principally as set out in the bullet points below.
- Northern Fringe – the entry for this area should be consistent with the results of joint working. Access to the proposed station will be needed from other parts of the development. The Phasing Table should reflect the fact that Chesterton Sidings could be redeveloped early.
- East Cambridge – reference to a link to the A14 should be deleted. It is too early to speak of a requirement for HQPT (HQPT) for Chesterton Sidings.
- Huntingdon Road/Histon Road – no development should be allowed until a full traffic/transportation study has been carried out. The need for HQPT must be included, along with details of joint working with other local authorities and of the relationship with neighbouring development areas.

- Other areas – the station and the Bell School sites are not dependent on the CGB. The Monsanto site development is not dependent on the infra-structure required for the Southern Fringe generally.

Inspector's Reasoning and Conclusions

9.14.1. The Table sets out what transport infra-structure is likely to be necessary to enable the development of each Area of Major Change to go ahead, and indicates the probable development periods for each area. This information is useful, should not be deleted and does not require further interpretation. Dwelling capacities are given in the specific sections on the individual Areas of Major Change. The promotion of the Phasing Table to policy status is unnecessary as Policy 9/2 refers to the Table. There is no lack of clarity between the Policy, its supporting text and the Table. The HBF objection is dealt with above under Policy 9/2.

9.14.2. As background, Structure Plan Policy P9/8 says that all development likely to have a definable impact on infra-structure requirements will be expected to make provision for infra-structure accommodating local impacts and also contributing to the needs of the Sub-Region as a whole.

East Cambridge

9.14.3. The questions of a link to and junction with the A14 are considered under Policy 9/4 below. In order to be in conformity with the proposed change to that Policy, the relevant entry in Table 1 should be amended. The route for HQPT from East Cambridge to the proposed Chesterton Station lies through South Cambridgeshire, and that Council is not committed to such a provision. Indeed that authority refers to the need for more detailed studies into potential routes, and to environmental implications, for example for Fen Ditton. In these circumstances the reference to the requirement for HQPT to Chesterton Station from the whole of the East Cambridge Area of Major Change should be deleted.

Southern Fringe

9.14.4. As at the end of the inquiry, the First Secretary of State's decision on the CGB was awaited. References to the CGB should remain in the Plan, as a matter of general principle.

9.14.5. It seems to me that the CGB will be an important factor in reducing the number of car journeys generated by Southern Fringe developments, and therefore in reducing the traffic impacts, and increasing the sustainability, of these proposals. Individual sites within the area, considered alone, might be capable of development without specific infra-structure items, such as the CGB or the Addenbrooke's access road. However the cumulative impacts of all developments in my view justify the content of the Phasing Table, requiring the CGB for all sites, and specific road schemes as set out in the Table. Structure Plan Policy P9/8 adopts a comprehensive approach to securing infra-structure. All development likely to have a definable impact on infra-structure requirements will be expected to make provision for infra-structure accommodating local impacts and also contributing to the needs of the Sub-Region as a whole.

9.14.6. The Bell School site would be within the catchment area of the CGB. To my mind this site falls within the area described as south and west of Addenbrooke's Hospital in Structure Plan Policy P9/9. The Policy in effect refers to the CGB as a requirement for the development of this area. The TA for the Bell School site is not an assessment of the impact of developing the remainder of the area in addition to the site individually, and in my opinion the Bell School site is a substantial site, as its indicative capacity is over 200 dwellings. The development of

this site alone might require limited infra-structure provision, but the cumulative impact with other areas in the Southern Fringe must be taken into account, and therefore the site's inclusion in the Phasing Table is justified.

9.14.7. The Phasing Table sets out the transport infra-structure needed to support the completed development of each area, not to support the commencement of development. The Bell School site is shown for early development. The Table suggests the CGB is necessary for the completion of the Southern Fringe as a whole, not before the commencement of individual parts of the area.

9.14.8. The Monsanto site is also a large site for development. It is not mentioned in Structure Plan Policy P9/9, but the points made above concerning cumulative impact and Policy P9/8 apply to the Monsanto site in my view. The requirements placed against the site in the Phasing Table should not be removed.

9.14.9. The wording of Policy 9/2 indicates that development can take place before infra-structure provision if it can be shown that harm would not be caused. It is for more detailed work to assess whether this applies to the Bell School and Monsanto sites.

9.14.10. During the inquiry the Council suggested that the Addenbrooke's development should be added to the relevant part of the Table. This would be sensible as that development is a major part of the Southern Fringe Area of Major Change. The Addenbrooke's access road is included as a requirement in the Table and in Policy 9/5. More detailed work will determine its timing.

Northern Fringe

9.14.11. The Council agrees that the wording of the Northern Fringe infra-structure requirements should be amended to accord with the provisions arising from joint working. SC9.009 is the result. Access to the proposed station from the east would lie within South Cambridgeshire. There is no technical evidence that development areas in the City would require further accesses over and above those referred to in the RDD as proposed to be changed.

9.14.12. Chesterton Sidings is a housing redevelopment site in South Cambridgeshire adjoining the City boundary. Some of its infra-structure provision would fall within the City. It is available for early development but the neighbouring site in the City, Cambridge WWTW, has major relocation and infra-structure requirements. It is a difficult site to develop. The infra-structure provision required by the Chesterton Sidings site is more modest than that required for the redevelopment of Cambridge WWTW, but the sites are undifferentiated in the Phasing Table, with a considerable body of infra-structure works listed and a late development phasing. In view of the relative simplicity of developing the Sidings compared with Cambridge WWTW, and the prospect of early development, I agree with Network Rail that the former should be distinguished from the latter and given an early phasing in the Table.

9.14.13. Because of the possible delays in bringing forward the Cambridge WWTW for housing development, I consider that the Sidings should not be shown in the Table as being dependent on works to, or associated with, the A14. My conclusions on this site involve some amendments to SC9.009. The Cambridge WWTW should continue to feature in the Table because development during the Plan period is possible. Even if development takes place after 2016 the development of the site is being planned for at present.

Huntingdon Road/Histon Road

9.14.14. The traffic study matter is dealt with above under Policy 9/2. Policies 8/2 and 8/3 are also relevant to the control of development in order to prevent harm

from traffic. There are further references in Policy 9/8. The CGB will travel along Histon Road and will provide HQPT. There will be improved bus services on Huntingdon Road. The proposals for other land near the City part of the Area of Major Change are being developed. The working relationships of the local authorities involved are several, detailed, and subject to change. They should not be set out in the Plan, and the Phasing Table need not be expanded in ways sought by the objection. Policy 9/2 itself is a detailed policy with provision to ensure the timely provision of infra-structure.

The Station

9.14.15. Policy 9/2 indicates that the transport infra-structure shown in the Phasing Table is that which will be required to support the completed development of each Area of Major Change. It does not indicate that the development of the Station Area cannot start until the CGB is in place. Although the CGB will benefit the developments at the Station, it need not delay their commencement, and the reference to the CGB here can remain.

RECOMMENDATION

9.14.16. I recommend that the RDD be modified as follows:

- a) replace the words "a new A14 link road to Airport Way by 2016" in the Cambridge Airport row with "provision of improved and satisfactory access arrangements to the A14";**
- b) delete the words "Chesterton Station" from the "All East" row of the Phasing Table;**
- c) delete "Clay Farm/Showground" from column 1 of row 5 of the Table and replace with "Clay Farm/Showground/Addenbrooke's development";**
- d) replace the "Northern Fringe" row with 2 rows, the first row to deal with Chesterton Sidings, with required transport infra-structure of access road from Milton Road to Chesterton Station, interchange facilities, and improved cycle, pedestrian and public transport links to Cambridge, phased before 2011, the second row to deal with Cambridge WWTW, with required transport infra-structure of A14 widening, junction improvements at the Milton A14 junction, CGB, new access road from Milton Road/Milton A14 junction, and improved cycle, pedestrian and public transport links to Cambridge, phased for 2011-2016.**

9.15 POLICY 9/3

Objections

The objections to this aspect of the plan are listed in Annex 3.

Pre-Inquiry Changes: SC9.010, SC9.011, SC9.012

Summary of Objections

- The criteria listed in this Policy should be expanded or amended. Some should be deleted entirely, or others added. Certain criteria should not be applied to specific sites.

- There are objections to the scale and location of proposed development.
- The list of matters to be the subject of planning obligations is excessive.
- The housing capacity of urban extensions needs to be established early.

Inspector's Reasoning and Conclusions

9.15.1. The Council agrees that some changes should be made to the Policy as a result of certain of the objections. The changes would incorporate references to integration of development in the urban extensions with existing communities and with transport networks, to the need to be guided by historic character in developing landscape frameworks, and to service by HQPT. I accept that these amendments would improve the Policy.

9.15.2. Many other suggested additions to the Policy criteria are already the subject of other Plan policies and do not need to be repeated here. These include development density, access to open space, sustainability, energy efficiency, further references to the historic environment, and mitigation of effects on existing cycle facilities. To impose a general requirement on new development to improve existing facilities would be too onerous.

9.15.3. Some objectors suggest the inclusion of material and factors which would make a long policy over-complex and too detailed. I include in this description criteria for managing the effects of construction, a matter which could be dealt with in guidelines or in association with planning applications. Questions of enforcement and consultation I deal with elsewhere in this report. Definitions of words like "practicable" and "appropriate" would not help make the Plan a succinct document. There may be circumstances where it is not possible to provide structural landscaping. The provision of land in new developments for facilities needed for existing development, especially where there are no proposals for those facilities, would be unreasonable. Hence the qualifying words should remain in the Policy.

9.15.4. In my opinion the arguments used in the above cases by the Council also apply to the Policy requirement to use innovative construction techniques. In some instances traditional methods will be perfectly acceptable. Without qualification the requirement is harsh, and criterion (l) should be suitably qualified.

9.15.5. Similarly the use of SUDS will not be possible in all circumstances and criterion (m) is appropriately qualified. The adoption and maintenance of drainage systems is not a matter for the Policy.

9.15.6. Insofar as criterion (n) reflects Policy 8/16 as proposed to be changed and does not add to the requirements of the Policy, I see no problem with it. As the principle of requiring renewable energy is acceptable, there has to be a means of securing its provision. In my view it would be difficult to ensure compliance with the Policy solely by use of conditions. This would particularly be the case in a large development or if the developer was choosing to meet the requirement by using passive solar design rather than by providing some form of energy generating equipment, and so the use of planning obligations would be legitimate.

9.15.7. I agree with objectors that waste recycling is a matter for the Waste Authority rather than the Cambridge Local Plan. The policy requirement in Policy 9/3 (o) for recycling provision to be made, especially for strategic provision to be made, should be removed. Paragraphs 8.53-8.56 explain the relationship of this Plan with the Waste Local Plan.

9.15.8. On more general matters, the reasons for the scale of development at Cambridge are set out elsewhere in this report. Policy 9/3, along with other Plan policies, aims to ensure that the housing requirement is met in a sustainable

fashion. Some loss of Green Belt is necessary, as is the provision of infra-structure. The Policy's criteria are suitable material for such a policy which seeks to integrate new development and mitigate its effects.

9.15.9. The Bell School site should not be exempt from the provisions of Policy 9/3. It is a substantial site, considered alone, and a significant part of the Southern Fringe urban extension. The Monsanto site is also discussed elsewhere.

9.15.10. The penultimate paragraph of the Policy is concerned with planning obligations in the urban extensions. The matters it covers are not excessive, given the size of the areas involved. The applicability of particular elements of the Policy to areas like the Northern Fringe, and to specific sites, will depend on the merits of the site, and paragraph 9.13 deals with this adequately. The site specific arrangements will also have to deal with maintenance, long term management, and any sums to be paid towards pooled contributions.

9.15.11. The final paragraph of the Policy considers housing capacity. Section 5 of this report explains my view that the Plan's provisions are sufficient to meet the Structure Plan housing requirement, and the Plan explains how. More details on housing capacity for each Area of Major Change will follow master planning. The information which should be available then justifies the use in the Policy of the term "actual housing capacity". A discussion here of the criteria to be used in establishing actual capacity would add unnecessarily to the length of the Plan.

9.15.12. Clause (j) is recommended for modification to reflect the disaggregation of the former Use Class A3 (see Section 6.14). Clause (k) of the Policy is recommended for modification as a result of my conclusions in 5.27.5/6 above.

RECOMMENDATION

9.15.13. I recommend that the RDD be modified as follows:

- a) incorporate SC9.010, SC9.011, and SC9.012.**
- b) in element (j) of Policy 9/3 delete "A2 and A3" and replace with "A2, A3, A4 and A5"**
- c) add to element (k) the words "-----, and located, where appropriate, to integrate well with existing communities."**
- d) add at the beginning of element (l) the words "where appropriate,"**
- e) delete element (o).**

9.16 PARAGRAPH 9.13

Objections

Cambridgeshire County Council
Trumpington Environmental Action Group (TEAG)

55/58/DEP02/09_13
460/38/DEP02/09_13

Pre-Inquiry Changes: SC9.013

Summary of Objections

- There should be references to the City and surrounding countryside, and to the Sustainable Development Guidelines.

Inspector's Reasoning and Conclusions

9.16.1. The proposed change, which I support, meets the objection of the County Council. As for the Sustainable Development Guidelines, the reference in paragraph 3.6 is enough.

RECOMMENDATION

9.16.2. I recommend that the RDD be modified by the incorporation of SC9.013.

EAST CAMBRIDGE**9.17 AREA ACTION PLAN 1 (FDD), POLICY 9/4, PARAGRAPHS 9.14-9.21, AND FIGURE 9/4 (RDD)****Objections to AAP1 and Policy 9/4**

The objections to this aspect of the plan are listed in Annex 3.

Objections to the Paragraphs and Figure

The Marshall Group Of Companies
South Cambridgeshire District Council

66/11/DEP02/09_16
461/36/DEP02/09_16
461/37/DEP02/09_16

Robert Cassels
Robert Cassels
Stuart Anderson
Cambridgeshire County Council
Mrs E. Connolly
Cambridge Preservation Society
South Cambridgeshire District Council
Cllr James Quinlan
Elizabeth Turner

666/3/DEP02/09_16
666/4/DEP02/09_17
738/2/DEP02/09_17
55/61/DEP02/09_19
760/1/DEP02/09_19
26/9/DEP02/09_F04
461/38/DEP02/09_F04
751/3/DEP02/09_F04
826/1/DEP02/09_F04

Pre-Inquiry Changes: SC9.014 - SC9.022**Further Proposed Changes: FPCs 22, 24, 25 and 39****Summary of Objections**

- The proposed redevelopment of this area is not a practical proposition because of the need first to relocate the Airport and Marshall's works, with a consequent loss of employment, and the creation of environmental problems for the relocation site and its surroundings.
- The area should not be developed because of loss of Green Belt, inadequate open space provision, traffic problems, lack of local services, harm to wildlife, social problems, noise, and lack of need.
- The proposals should be deleted as a DPD is being prepared for the whole cross-border area.
- There are objections to the phasing provisions concerning this area, and to the education, employment and waste provisions.
- The green corridor should be located differently, and should/should not be designated Green Belt.
- The highway and public transport proposals are inadequate. There is too much detail concerning road requirements.

- There are detailed objections about dwelling capacity, the wording of the Policy and supporting text, landscape and countryside matters, relationships with South Cambridgeshire, density and design.

Inspector's Reasoning and Conclusions

Should the East Cambridge Proposals Be Included in This Plan?

9.17.1. Structure Plan Policy P9/2c requires the Local Plan to make provision for housing and mixed use development on land to be released from the Green Belt north of Cherry Hinton and at Cambridge Airport. The Local Plan is unable to avoid this release of Green Belt land, and I will not attempt to re-open the Structure Plan debate on these proposals. However the location of development on the edges of the City is preferable to a dispersed pattern of development elsewhere in the Sub-Region, for reasons of sustainability.

9.17.2. The scale of development required by regional guidance and the Structure Plan will inevitably lead to some loss of open land, and this has been taken into account in the strategic plans affecting the City. Wherever the growth of development is proposed there is likely to be temporary construction disturbance, additional traffic, and other impacts. Attention to detail in design and implementation should prevent untoward noise levels from being created.

9.17.3. The need to release land from the Green Belt will not delay development. Land owners are keen to progress development. Villages which are physically separate from the City will not be absorbed into the City's built-up area.

9.17.4. I deal with the former Blue Circle land and with Netherhall Farm in Chapter 5 above, as omission sites.

9.17.5. The County Council is carrying out a County Strategic Transportation Study, referred to elsewhere in this report. Before development takes place here a full TA will be undertaken, involving a consideration of the effects on the various roads and junctions about which objectors are concerned. Necessary provision of highway and other transportation schemes to cater for traffic impacts will be made. Rail schemes which are unrealistic should not be included in the Plan. The decision on the CGB rests with the First Secretary of State. Decisions on the nature of healthcare provision are not for the Local Plan to make, but the Local Plan has policies requiring the provision of services and facilities.

9.17.6. The RDD recognises the constraints affecting East Cambridge. The relocation of Marshall's and the Airport has been under consideration for some time and sites at Mildenhall, Wyton and, possibly, Alconbury (but not Duxford) are being investigated for this purpose. I do not see why this work should not result in a viable relocation proposal, given the commitment of interested parties and the time available. There is adequate land for housing in the City to meet Structure Plan requirements up to 2016 without using the Marshall's and Airport land. However these sites would make a major contribution to post-2016 needs, on previously developed land. As the relocation site has not yet been chosen it cannot be referred to in the Plan. The Council will be able to monitor progress on the relocation issue and take any necessary action should matters be delayed.

9.17.7. The analysis of the suitability of relocation sites will take account of the employment and sustainability effects of relocation, insofar as matters such as the relocation of jobs have not been assessed as part of the strategic planning process. There will be employment land in East Cambridge, and consideration can be given to the traffic effects of relocation and to any need for transportation provision to meet needs.

9.17.8. East Cambridge straddles the boundary with South Cambridgeshire. A

DPD for the whole of East Cambridge is being prepared, but the Cambridge Local Plan will give guidance on the City part of the area until the DPD has been approved. I give weight to the certainty which an approved Local Plan will give to the parties involved in the relocations and in the other work necessary to bring this area forward for development. The availability of firm guidance will help the relevant parties to meet the costs of relocation. The preparation of the DPD indicates that the 2 local planning authorities responsible for the area are working together and that a co-ordinated approach is being followed.

9.17.9. There is no evidence to suggest that the area is noteworthy for its biodiversity. The biodiversity of the green corridor could be enhanced. Improvement of some existing habitats, and creation of new sites designed to attract wildlife, will be possible.

The Green Corridor and Other Open Spaces

9.17.10. Policy 9/4c requires a strategic open space dedicated for recreational and amenity uses and protected as Green Belt. This is also referred to as a green corridor. The corridor is shown diagrammatically on Figure 9/4. It will provide open space for existing and new residents.

9.17.11. Some objections have been met by the large scale redrafting of this section of the Plan in the RDD version and by a variety of proposed changes. Other objections challenge the release of land in the area from the Green Belt, but as stated above the Structure Plan itself identifies this release. The maintenance of the Green Belt around the City is subject to the identification of areas for expansion.

9.17.12. The Council's Inner Green Belt Boundary Study 2002 was a principled review of the Green Belt, and identified this area as having low importance to the Green Belt. The green corridor will be retained as, in the words of Structure Plan Policy 9/2b, an area "required to maintain the purposes of the Green Belt as set out in Policy 9/2a in the context of delivering sustainable development and planned settlement form". The need to deliver sustainable development without creating a dispersed or extensive settlement form is met by the identification of the area generally for development. Separation between settlements can be achieved by the green corridor and the use of land in South Cambridgeshire. The strategic function of the Cambridge Green Belt will be fulfilled by the extensive belt remaining around the City and by the green corridors penetrating the City. Green corridors are a feature of Cambridge's character.

9.17.13. There is no need for the Local Plan to add to the full policy and supporting material already found in the Structure Plan. Although I am not here commenting on matters of public consultation, I note that the AAP is subject to community involvement.

9.17.14. As the green corridor will fulfil the functions of other green corridors in Cambridge which are part of the Green Belt, it is right that this green corridor too should be part of the Green Belt, as specified in Policy 9/4c. SC9.015 usefully sets out the corridor's role in connecting the open countryside with Coldhams Common, a point which is best made in sub-section (c), where the strategic open space is first mentioned.

9.17.15. The detailed uses of the green corridor and Green Belt will be established in the AAP. As for the boundary of the Green Belt, the Council suggested a change during the inquiry in response to an objection by South Cambridgeshire District Council. This would have the effect of showing a boundary on the Proposals Map and on Figure 9/4. The boundary appears to be diagrammatic and is likely to be subject to change. Notwithstanding the agreement of certain parties to this

approach to boundary definition, there are objectors who are not satisfied by the suggested change, and there may be other objections arising from consultation on the AAP. I therefore do not support the suggested change to the Proposals Map, which should merely indicate that the area is an Area of Major Change.

9.17.16. The diagrammatic depiction of the corridor in Figure 9/4 is appropriate for the stage which work on the area has reached, and in the absence of obvious boundaries within the City part of East Cambridge. The width of the corridor and its precise location await the AAP. However the work on the green corridor in the AAP suggests a different location for the corridor, and it is that, latest, location which should be shown on the Figure, in accordance with FPC22. In view of the latest work on the location of the corridor, its depiction in the Figure should not be changed to move it nearer to Cherry Hinton.

9.17.17. The suggested change to paragraph 9.17 improves the consistency of this part of the Plan and should be made.

Land Uses

9.17.18. Cambridge Airport is a strategic employment site identified in the Structure Plan. Hence the reference in Policy 9/4 to the provision of employment land. The first footnote to the Policy, as usefully inserted by SC9.020, gives sufficient explanation regarding the amount of land and employment. I agree with the Council that more detail would be over-prescriptive in the light of the AAP which is under preparation.

9.17.19. As Anglia Polytechnic University intends to retain its existing main site in the built-up area of the City, relocation of the University to East Cambridge has no place in the Plan.

9.17.20. The principal land uses in Policy 9/4 in many cases could be situated in the City, in South Cambridgeshire, or in both. The use of footnotes, as set out in changes put forward by the Council both before the inquiry and during the inquiry, would make this plain. It is not possible with available evidence to say at this stage exactly which elements will be in the City, and my comment above regarding over-prescriptive detail applies here too.

9.17.21. A district centre here is appropriate because of the likely number of new houses in the Area of Major Change, and the distance to existing shops. The nature and scale of the district centre to be provided in East Cambridge should take into account impact on the City Centre, as the City Centre is the main centre for the Sub-Region. The new district centre should therefore avoid harm to the vitality and viability of the City Centre. On the other hand there is no need to avoid impacts on the Newmarket Road out of centre shopping.

9.17.22. The waste element of Policy 9/4 should be deleted. Waste policy is a topic for the Waste Local Plan and its successor, which has not yet been prepared. The Waste Local Plan does not identify any specific sites here.

Transportation

9.17.23. Structure Plan Policy P9/9 requires, for this area, the provision of a new access road/distributor for the land to be developed north of Cherry Hinton, and, for the Airport development, a new interchange on the A14, replacing Fen Ditton interchange, linked to Airport Way. As a result Local Plan Policy 9/4 requires a link to the A14. However the evidence before me is that it is yet to be determined how best to provide improved access to the A14. Accordingly the Council proposes a change, SC9.018, to keep open the options of improving an existing junction or creating a new junction. I support the change, despite the Highways Agency objection that a new link and access could harm the free flow of traffic on the A14.

It seems to me that some provision for access improvements to the A14 will be likely to be needed, given the scale of development and its importance.

9.17.24. I note that there are typing errors in SC9.018, which I correct in my recommendations.

9.17.25. The proposed development will add to traffic flows on the A14. Plan Policy 9/2 identifies that the widening of the A14 will be required to support the completed development of East Cambridge. Without specific evidence that the unimproved A14 would be unable to accommodate particular levels of development in East Cambridge I do not support any tighter restriction on the phasing of the East Cambridge proposal. However Policy 9/2 does require the agreement of a detailed transport network before the development of each Area of Major Change is commenced. Such a network would include public transport improvements. Proposed changes SC9.019 and 9.022 make sensible amendments to emphasise the importance of certain measures to assist non-car travel modes.

9.17.26. The Local Plan also provides for a new east-west link as part of the East Cambridge proposals. However other roads suggested by objectors, such as a southern and eastern ring road, are not supported by detailed evidence of need, support by the relevant parties which would progress them, and funding availability. Cowley Road is not in East Cambridge. I comment on closing Fen Road elsewhere in this report.

Other Matters

9.17.27. I discuss housing density in Chapter 5 above. The indicative capacity of the Area of Major Change is given as 4,660. This figure has been arrived at by applying a density figure to the area likely to be available for development after making allowances for the green corridor and other land uses. The density figure reflects the likelihood that some parts of the City's section of the Area of Major Change will be located near services and central area land uses. This seems to me to be a reasonable way of arriving at an indicative dwelling capacity. The Structure Plan regards East Cambridge as an area suitable for high density development.

9.17.28. It is not necessary to have a precise boundary for the green corridor in order to calculate what is only an indicative capacity. At the present level of knowledge, no more exact figure or breakdown by periods can be given, pending more detailed work. However an inaccurate figure given in the RDD for South Cambridgeshire is corrected by one of the Council's proposed changes. A development on this scale will be capable of accommodating a variety of types of housing.

9.17.29. The Council agrees that phasing of development will have to be carefully considered. Other Plan policies govern this. Transportation infra-structure provision is touched upon above. Policy 9/3 deals with other types of provision. East Cambridge of all the allocated sites and areas in the Plan is subject to the least degree of certainty concerning timing, and the information given reflects the state of knowledge at the time of the inquiry. Other policies of the Plan also deal with topics like renewable energy and the conservation of historic landscape features.

9.17.30. Cambridge is a Sub-Regional centre, but has some Regional functions. It is appropriate for paragraph 9.16 to refer to the Regional role of the City, in the context of the possible location of facilities at East Cambridge. Civic uses cannot be required to locate at East Cambridge, but would be acceptable here.

9.17.31. There is a Listed Building at the Airport, and the future of this will be decided in the light of policies applying to such buildings. There is no evidence that other buildings are of particular value but it will be for more detailed planning to

decide the future of individual buildings at the Airport.

9.17.32. Paragraph 5.11.22 of this report deals with FPC39. The costs of relocation in the case of East Cambridge should be taken into account in deciding the amount of affordable housing to be provided.

9.17.33. Some objections deal with detailed matters which are more relevant to the AAP, such as whether houses should face open areas, and how the design of dwellings will relate to the landscape.

9.17.34. Cambridge Sewage Treatment Works is not situated in East Cambridge. Sub-section d of the Policy should be modified to reflect the disaggregation of the former Use Class A3 (see Section 6.14).

RECOMMENDATION

9.17.35. I recommend that the RDD be modified as follows:

a) by the incorporation of SC9.014-SC9.017 and SC9.019-SC9.022, and by the incorporation of SC9.018 but retaining the full road name "Coldham's Lane" whilst deleting the unnecessary second "arrangement".

b) by the incorporation of FPCs22, 24, 25, and 39.

c) by the deletion from sub-section d of Policy 9/4 of "A2 and A3" and its replacement with "A2, A3, A4, and A5".

d) by the deletion of sub-section g from Policy 9/4 and renumbering the remaining sub-sections as necessary.

SOUTHERN FRINGE

9.18 AREA ACTION PLAN 2 (FDD), POLICY 9/5, PARAGRAPHS 9.22-9.25, AND FIGURE 9/5 (RDD)

Objections to AAP2 and Policy 9/5

The objections to these aspects of the plan are listed in Annex 3.

Objections to the Paragraphs and Figure

Trumpington Environmental Action Group (TEAG)	460/15/DEP02/09_22
Robert Cassels	666/6/DEP02/09_22
Trumpington Meadows Land Company	798/2/DEP02/09_23
Papworth Hospital NHS Foundation Trust	834/5/DEP02/09_23
Cambridgeshire County Council	55/63/DEP02/09_24
Trumpington Environmental Action Group (TEAG)	460/16/DEP02/09_24
Robert Cassels	666/7/DEP02/09_24
Trumpington Environmental Action Group (TEAG)	460/18/DEP02/09_25
Countryside Properties	68/21/DEP02/09_F05
Addenbrooke's NHS Trust	399/31/DEP02/09_F05
South Cambridgeshire District Council	461/41/DEP02/09_F05
John de Bruyne	770/3/DEP02/09_F05
Trumpington Meadows Land Company	798/29/DEP02/09_F05
Countryside Properties/Liberty Property Trust	837/27/DEP02/09_F05

Pre-Inquiry Changes: SC9.023-SC9.026, SC9.030 & SC9.031

Further Proposed Changes: FPC 26, 27, 31 - 38

Summary of Objections

- The Southern Fringe cannot, or should not, be developed, because of environmental and infra-structure problems. Alternatively, there should be less development than proposed in the Plan. More details should be given of dwelling capacities.
- Certain sites for development should be added, deleted, or expanded.
- There should be changes in the land use proposals in this area.
- Particular highway and transportation proposals should be incorporated or deleted. They will harm the green corridor.
- The proposals or policy criteria concerning green corridors, green wedges, and other open space should be amended.
- Proposals concerning pedestrian movement and cycle provision should be amended.
- The waste element of Policy 9/5 should be deleted or amended.
- Particular design approaches should be used.
- There should be a high proportion of affordable housing.
- There are comments on community facilities and public consultation.

Inspector's Reasoning and Conclusions*The Principle and Scale of Development in the Southern Fringe*

9.18.1. Structure Plan Policy P9/2c requires this Local Plan to make provision for housing and mixed-use development both south and west of Addenbrooke's Hospital and east and south-east of Trumpington. To my mind the wording would include Clay Farm in the latter area. The Policy envisages that land would be released from the Green Belt so that this provision can be made. Several objections seek to re-ignite the Structure Plan debate which led up to this proposal for major development in the Southern Fringe, but I do not question the Structure Plan's conclusions.

9.18.2. In the light of the above, I do not conclude that the Southern Fringe proposals should be held back in favour of schemes on previously developed land elsewhere. I cannot deal with proposals outside the City, and I comment above in Chapter 5 on the former Blue Circle site.

9.18.3. An approximate dwelling capacity is given in Policy 9/5. At the present level of knowledge, no more exact figure or breakdown by periods can be given, pending more detailed work. I deal above, under Policy 5/1, with the realism of proposed densities. The need to review the Green Belt does not mean that the timing and scale of development proposed are unrealistic: the review has been carried out, and there is relatively little opposition in principle to land release. Developers and others involved in the development process are progressing the Southern Fringe proposals and I consider there is no lack of certainty about the sites in the Southern Fringe coming forward for development. The first planning applications are anticipated soon, and I would expect them to include any measures necessary to deal with possible flooding.

9.18.4. In relation to the Defence Estates objection, much of the proposed housing development, and associated community facilities, could be seen as an expansion of the existing community of Trumpington. There is therefore the opportunity to create a new community based on the old. The Area Development Framework is well advanced and will seek to establish links between the eastern

and western parts of the Southern Fringe. The risk of flooding from a 100 year event in the Southern Fringe is small. New public open space, and improvements to nearby football pitches, will make up for the loss of the playing field at Bell School. These existing playing fields are not open to the public.

9.18.5. There is no specific evidence that the indicative capacity of 3320 dwellings will cause a level of harm which significantly exceeds that which might be associated with any other particular number of houses. Again, the effects of substantial levels of development have been taken into account in the planning which has been carried out so far, and this process can continue. Design and infrastructure requirements, and the effects on open land, will continue to be the subject of analysis.

Site Specific Objections

9.18.6. I deal above with omission sites including those in the Southern Fringe. There I conclude that additional land should be allocated for development at Glebe Farm and the Monsanto site, but that no other additional sites should be allocated. Other sites as set out below, which are Plan allocations, should continue to be so.

9.18.7. The Monsanto site includes a large area of previously developed land. It is located near a Park and Ride facility and close to Trumpington. It has access to good public transport and to services. Housing is an appropriate use. Some mixed uses will be provided. In view of the identified need to correct the imbalance between housing and employment in the Sub-Region I do not support a change in the allocation of the Monsanto site to an employment allocation. The Council's Industrial Land Review did not identify this site as one of those of those which should be chosen for protection as industrial land. The public transport links to the site will provide access to jobs. The Park and Ride facility will not be lost.

9.18.8. There is no harm in showing, on Figure 9/5, proposals in South Cambridgeshire District, where those proposals are acceptable to the District Council. The housing capacity of the Monsanto site will be finalised in due course, but will be subject to TA and other assessments.

9.18.9. The question of expanding the Monsanto and Glebe Farm sites is considered with the omission sites. As a result of my conclusion that the sites should be expanded paragraph 9.23 and Figure 9/5 need to be amended to include the correct site areas (proposed changes SC9.026 and FPC27).

9.18.10. Land at Glebe Farm, north of the proposed Addenbrooke's access road, and the land west of the Bell School site, have been allocated as part of the Southern Fringe proposals. Site 9.02 has been given a straight southern boundary as requested by one objector. Glebe Farm is a suitable housing allocation because it is located inside the curve of the proposed access road, against the existing urban edge. The road and housing site would form a new urban edge, with the opportunity to improve the character and appearance of this interface between the City and countryside. The proposed strip of housing would be an acceptable addition to the built-up area considered in the context of the new road and the large area of Green Belt remaining outside the line of the road. The relevant parties will arrange the financing of the road.

9.18.11. A general point raised by an objector concerning the Monsanto and Glebe Farm sites is that they are not identified in the Structure Plan for development. From my conclusions above I can say that there are particular reasons for their allocation, namely that the Monsanto site is mostly previously developed land and the Glebe Farm site would be 'created' by the formation of a new urban edge in the form of the Addenbrooke's access road.

Proposed Land Uses

9.18.12. The section of the Plan dealing with the Southern Fringe has been re-written and this meets some of the points raised by objectors.

9.18.13. There has been considerable discussion and agreement between the Council and objectors concerned with allocations near Addenbrooke's. I agree that the land use descriptions in Policy 9/5 should be amended to recognise the role played by wider medicine-related and support activities, some of them commercial, in the proposed research area near the Hospital. This will be important in enabling the Hospital and related uses to maintain and expand their leading role in the local and wider economies. The Council has put forward FPC38 to encompass the changes. The reference to the use of S106 agreements to control uses is appropriate as the primary function of the site is intended to be research related, and not manufacturing for example. Without S106 agreements the specific uses sought in the research area could revert to any Class B1(a) and (c) uses. Given the special nature of the proposal, paragraph 9.23a (FPC33) would be useful explanation.

9.18.14. FPC38 with FPC31 also allows for the widening of possible uses on the safeguarded land west of the Bell School site. This recognises that only part of the land will be needed for clinical services and much could be used for the expansion of the research area when the allocated land for that purpose runs out.

9.18.15. FPC38 finally reflects more accurately the relocation possibilities for Papworth Hospital, and copes with the eventuality that Papworth Hospital might not relocate to a site near Addenbrooke's.

9.18.16. FPC32 makes changes to the supporting text to accord with the Policy changes discussed above. FPC34 and 35 reverse the positions of paragraphs 9.24 and 9.25 to improve the readability of this part of the Plan.

9.18.17. There are suggested changes to the educational land provision elements of the Policy and reasoned justification. FPCs36 and 37 result from the relevant inquiry session and subsequent work by the Council and the Local Education Authority. These introduce a welcome flexibility in view of the state of knowledge of educational needs.

9.18.18. The above suggested changes supersede some of the Council's proposed Pre-Inquiry Changes. Here, and in the case of the University's land considered below, the County Council suggests adding to wording agreed during the inquiry but, as the County's additional suggested wording was not discussed at the inquiry I do not recommend its inclusion in the respective Policies.

9.18.19. As a matter of principle, for reasons of national policy, it is preferable to consolidate facilities in Trumpington village centre rather than allowing too much retail and similar development in new housing areas. The reference to "consolidation" in Policy 9/5(g) should stay. This reference is adequate without the addition of "and integration", in the light of my recommendation above to modify the RDD by incorporating similar wording into Policy 9/3(k). The precise location of any growth of the centre is for the Area Development Framework.

9.18.20. With regard to objections concerning community facilities, places of worship do not now appear in the list of such facilities required. It is not appropriate to refer in the Local Plan to such detailed matters as the provision of banks and post offices. Finally on this topic, the need for a quality retirement home is not a matter for this broad level of land allocations.

Highways and Transportation

9.18.21. There is a body of objections to the Addenbrooke's access road. The

Structure Plan background to the Southern Fringe proposals is set out above. The scale of development at the Southern Fringe will require such a road, to carry some of the traffic generated and to intercept traffic that would otherwise travel through Trumpington. The access road is proposed in order to prevent development at Trumpington exacerbating congestion in the village. Location of the development elsewhere would generate traffic, with resultant noise and pollution. The Structure Plan has chosen the principal locations for new development, and this road is one of the Structure Plan's transport investment priorities.

9.18.22. The road will not adjoin existing housing in Bishops Road. The forms of the junctions with existing roads have not yet been decided, but the new road should remove some of the existing traffic from Hauxton Road and Shelford Road. There is the opportunity to ease existing congestion at some points. The design of junctions is a matter of detail to be attended to in master planning and the preparation of planning applications. Commencing the road at the M11 junction would have significant implications for that motorway junction.

9.18.23. Siting the road well away from Bishops Road would place it in a more prominent position in the countryside south of the City. Landscaping provision, drainage, and the type of lighting to be used will be subject to further detailed work, but the landscape effects of the road will be reduced by its location alongside the new urban edge for much of its length. It is possible to design lighting to avoid light spillage. Local Nature Reserves are some distance away from the likely road line and in my opinion would not be harmed.

9.18.24. Engineering and landscaping solutions will be available for some of the visual impacts of the road. However the crossing of the Cambridge-London railway line by the road and the CGB will require prominent structures which in my opinion can be expected to spoil the appearance of the area. I consider that it will not be possible to hide these structures and associated works, although design and landscaping can be used to soften impacts. The 2 transport systems cannot be given a combined crossing because they are likely to approach the railway along quite separate routes. A tunnel crossing has been investigated and found to be impracticable. The green corridor along Hobson's Brook will be disrupted by these major transport routes and by the proposed cycleways, although Policy 9/5(m) is included to ensure mitigation of the disruption.

9.18.25. The new road can be expected to have visual and environmental impacts, but, overall, and given the strategic context referred to above, my opinion is that the need for the road is of greater weight than its impact. There is no proposal to extend the road to provide a southern and eastern by-pass for Cambridge, nor to link directly with Long Road. As there are safeguards in place in the wording of the Local Plan, and the Council and other bodies are well aware of potential impacts, I conclude that no changes to the wording, to emphasise design or mitigation, are necessary.

9.18.26. The wording of the RDD now mentions the necessity of timely provision of infra-structure. The alignment of the road is to be shown more accurately by virtue of SC9.031. However the Council maintains that the precise line of the road cannot be shown on the Proposals Map as the line has not been finalised. No more than a diagrammatic line is shown on the draft Area Development Framework. It is not feasible for the Local Plan to attempt to limit the HGV use of the road to essential service vehicles only, or otherwise to prevent normal traffic use of the road.

9.18.27. The Addenbrooke's access road is not intended merely to provide access to developments at and near the Hospital. Its junction with Hauxton Road will also give access to the Park and Ride site and to the Monsanto site. The latter is a large

proposal and should have an access to Hauxton Road, but it will add a relatively low proportion of traffic to the new junction, and it is not appropriate at this stage to limit the density or number of housing on the Monsanto site. The details of the junction are yet to be worked out but it seems to me that technical solutions to the operation of the junction, which do not penalise traffic using the Addenbrooke's access road, will be possible. The Park and Ride site would be given priority over Monsanto traffic.

9.18.28. The traffic and parking problems associated with the Hospital should not prevent the Southern Fringe development, in the light of the Structure Plan's proposals.

9.18.29. The accessibility element of Policy 9/5 does not include a firm proposal for access to the Clay Farm allocation from the west. The reference is only to the investigation of a possible link. This reference should not be omitted, in case such a link is needed and/or offers overall benefits. If the disadvantages of such a link should prove to outweigh the advantages, the link need not be investigated further. If a link road is provided it need not be a through road.

9.18.30. A railway station at Addenbrooke's is not proposed. The CGB is intended to provide a rapid transit system.

9.18.31. Definitive rights of way will be considered as part of the detailed planning of the area.

9.18.32. The Local Plan Proposals Map does not show cycleways. Policy 9/5(q) requires strategic cycle routes northward and along the CGB route. The former is likely to use the Hobson's Brook corridor but will not necessarily be located immediately alongside that Brook or Vicar's Brook. The safety of cyclists will be a factor for consideration in the location and design of any cycleway. It is desirable to avoid too much detail in the Plan. These are matters for more detailed planning, but I conclude that there are opportunities for locating the cycleway without harming Hobson's Brook, Vicar's Brook, or pedestrian movement. There is insufficient justification for a policy to prevent the cycleway from being located near the Brooks.

9.18.33. Questions regarding the granting of permission for cycleways to cross railways and other features are not for me: there is no evidence that the proposed east-west cycleway is not a feasible proposition. Again the detail of the east-west cycleway is for the Area Development Framework, and I note the Council's intention that Robinson Way will be an important link for cyclists.

The Green Corridor and Other Open Spaces

9.18.34. There will inevitably be a loss of greenfield land as a result of the Structure Plan's proposal to site large scale development in the Southern Fringe. The Area Development Framework will need to mitigate the loss by making the best use of remaining open space and providing new facilities where possible.

9.18.35. In my view the green corridor which would remain open after development of the Southern Fringe will be a substantial open area. Its width will be comparable with that of some of the green corridors which penetrate other parts of the City's built-up area, form part of the Green Belt, and contribute to the character of Cambridge. The Southern Fringe green corridor is to remain part of the Green Belt, as can be seen from the Proposals Map: it is not necessary to refer to this in the Policy in the light of the Proposals Map content. However the green corridor will be of sufficient size to create a large scale open space of City-wide importance, and the RDD Policy now says this.

9.18.36. The open space is properly described as "strategic", in paragraph 9.22,

for reasons given above. As far as the development associated with Addenbrooke's Hospital is concerned, the Council would seek links through to the open space via the development area, but not strategic open space within the development area. I see no evidence that the juxtaposition of allocations and open space is at odds with other Plan policies.

9.18.37. Some objections request changes which are relevant to master planning and subsequent work. The Local Plan operates at a more general level. These objections include those requesting planting along the new Green Belt edge and that land west of Hobson's Brook is left open in the interests of preserving and enhancing biodiversity. The question of whether houses should face open areas, and how the design of dwellings will relate to the landscape, are for the Area Development Framework and later analysis. The long term management of open space is also a detailed topic of which the Council is aware. Nor is it necessary to repeat in this Plan material from the Structure Plan. New planting falls to be considered under other Local Plan policies: paragraph 9.24 is concerned with preserving existing features. Conserving historic landscaping features is a concern of Chapter 3 of the Local Plan.

9.18.38. The expression "should" is used rather than "must", in relation to what the proposals ought to achieve, because these matters might have to be balanced against other desirable objectives. Key views can be respected: from the chalk hills the Southern Fringe is seen to be well developed already. The green corridor, although narrower, would continue to separate the eastern built-up area in the Southern Fringe from the western. Distinctive gateways and protection of views can be achieved by design. Relative sustainability was considered in the preparation of the Structure Plan.

9.18.39. Policy 4/15 deals with development and flooding. It prevents development where harm would result. The addition of new built-up areas, roads and other infra-structure in the Southern Fringe will have to be accompanied by the provision of adequate drainage and sewerage. This provision might lead to the creation of additional open areas, but this is a matter, again, for more detailed work.

9.18.40. Paragraph 9.24 refers to features of biodiversity importance: this would include Nine Wells Local Nature Reserve. There are several policies which protect these and other features of importance. Much of the green corridor is arable farmland, and this is likely to have limited wildlife value. The recreational use of parts of the corridor offers the opportunity to enhance biodiversity. Enhancement of some existing habitats, and creation of new sites designed to attract wildlife, will be possible.

9.18.41. The arrangement of active and passive recreational uses in different parts of the corridor will be addressed in the Area Development Framework. However there will be a need for active uses in places and I do not accept that the green corridor should be reserved for non-active uses only. Nevertheless access to the open countryside is a theme of the Area Development Framework.

Other Matters

9.18.42. Waste policy is for the Waste Local Plan, not for the Cambridge Local Plan. The requirement for the provision of a waste recycling centre in the Southern Fringe should be removed from Policy 9/5. The County Council has yet to identify a site for a recycling centre. A site review was under way at the time of the preparation of evidence for my inquiry, and potential locations will be put forward in the Minerals and Waste Development Plan, which is being prepared. In the absence of any more concrete proposals there should be no reference to a waste

recycling centre in the Southern Fringe section of the Cambridge Local Plan.

9.18.43. Affordable housing will be provided as part of the Southern Fringe developments, and the Plan contains policy to govern provision. Substantial amounts will be available near Addenbrooke's Hospital and key workers at the Hospital will have access to it. I see no advantage for the Plan in inserting in Policy 9/5 a cross-reference to the housing policies, as the Plan is to be read as a whole. Otherwise I deal with key worker housing in section 5.14.

9.18.44. In accordance with the Structure Plan, land west of Trumpington Road has been assessed to discover whether it is suitable for development, and found to be unsuitable.

9.18.45. I do not comment on the public participation procedures the Council has followed. Paragraph 2.12 of the Plan makes reference to future intentions.

RECOMMENDATION

9.18.46. I recommend that the RDD be modified as follows:

- a) incorporate FPCs 26,27, and 31-38.**
- b) incorporate SC9.026, SC9.030 and SC9.031.**
- c) delete element (i) from Policy 9/7.**

NORTHERN FRINGE

9.19 AREA ACTION PLAN 3 (FDD) AND POLICY 9/6 (RDD)

Objections

The House Builders Federation	362/23/DEP01/AAP_03
Network Rail	370/24/DEP01/AAP_03
	370/26/DEP01/AAP_03
	370/37/DEP01/AAP_03
	370/44/DEP01/AAP_03
	370/47/DEP01/AAP_03
Transport 2000 Cambridgeshire & West Suffolk	374/13/DEP01/AAP_03
	374/15/DEP01/AAP_03
	374/16/DEP01/AAP_03
Environment Agency	434/10/DEP01/AAP_03
Cambridge Cycling Campaign	437/12/DEP01/AAP_03
The Cam Too Project	664/1/DEP01/AAP_03
Highways Agency	697/3/DEP01/AAP_03
	697/5/DEP01/AAP_03
Taylor Woodrow Developments Limited	2/11/DEP02/09_P06
Turnstone Estates	47/9/DEP02/09_P06
South Cambridgeshire District Council	461/42/DEP02/09_P06
Highways Agency	697/2/DEP02/09_P06
Stannifer	775/9/DEP02/09_P06
Anglian Water Services Limited	782/8/DEP02/09_P06

Summary of Objections

- The site is unlikely to come forward within the Plan period.
- There are objections relating to phasing, density and uses within the site.
- Objection is made to the affordable housing and transportation requirements and a holding objection is made to the policy on community facilities.

- Issues are raised relating to existing and proposed waste facilities.
- A number of objections raise transportation and access issues.

Inspector's Reasoning and Conclusions

9.19.1. There is no certainty in the Policy as to the timing of this development. However, Topic Paper 4 from the Council does not reflect the formal position of Anglian Water Services Ltd with regard to the relocation of the Cambridge WWTW. The WWTW will clearly be a difficult site to develop, but master planning is progressing for this area and work on relocating this facility is underway. There is no convincing evidence available at this stage that this part of the Northern Fringe will not come forward during the lengthy Plan period, or to justify removing it from the allocation.

9.19.2. Because of the uncertainty as to when the site will come forward, it is not possible to provide definitive guidance as to phasing, but Policy 9/2 gives guidance on phasing in relation to the provision of transport infrastructure. In relation to the Northern Fringe, I have recommended in paragraph 9.14.16 that the Phasing Table should treat the infrastructure requirements for the redevelopment of the Cambridge WWTW separately from those for Chesterton Sidings, and should give the Sidings an early phasing in the Table.

9.19.3. I conclude in Chapter 7 that the amount of land identified for commercial uses within this site should not be increased. The residential density proposed in the Policy reflects its brownfield nature and the intention that it will be served by a HQPT interchange, and accords with PPG3 advice.

9.19.4. Policy 8/18 of the RDD deals with the provision of water, sewerage and drainage infrastructure, and the supporting text to Policy 9/6 specifically refers to the issue of odour from the Cambridge WWTW. No further reference to these matters is necessary in the Plan. The Council acknowledges that the Cambridge WWTW will have to be relocated away from the site in order for it to be fully developed, and proposes a change to paragraph 2.6 of the Plan to make that clear. Anglian Water Services Ltd support that amendment as addressing their objection to the RDD. Subject to that change being incorporated in the adopted Plan, no further modifications are required to Policy 9/6 or its supporting paragraphs in this regard.

9.19.5. The Council acknowledges that the high costs involved in relocating the Cambridge WWTW should be taken into account in determining the affordable housing requirement for the development. The County Council has also acknowledged that the implementation of a public transport strategy can be phased to take account of issues of affordability. In the light of this, there is no reason to make any exception from Policy 5/5 or Policy 8/7 for this site. The extent of community facilities on the site has not yet been determined, and will be considered further at the Area Development Framework and Master Plan stages. However, the provision of an appropriate level of facilities will be important in achieving a successful development and there is no justification for the requirements of Policy 5/13 not to apply here.

9.19.6. The Cambridgeshire and Peterborough Waste Local Plan 2003 identifies the Anglian Water site, Cowley Road and Chesterton Sidings as a preferred site for a Major Waste Management Facility, and as a suitable location for household waste facilities. The requirements in Policy 9/6 g and h accord with that Policy. The siting and design of such a facility would require careful consideration. However, there is no convincing evidence that it would significantly limit the opportunities for residential development or unduly affect land values, bearing in mind the size of

the overall development area. Although the need for waste management facilities identified in the Waste Local Plan may result in increased costs there is no evidence that they will be disproportionate. Because this Plan gives guidance on the principal land uses to be provided in this Area of Major Change, it is appropriate for the Policy to refer to the amount of land likely to be needed for these facilities so that developers have guidance as to the land issues to be considered.

9.19.7. Policy 9/2 and the Phasing Table set out the transport infrastructure requirements for each of the Areas of Major Change, including the Northern Fringe. But the relationship between the new station, the proposed site of which lies outside the Plan area, and the phasing of development on the rest of the site has not yet been addressed. It would therefore be inappropriate to make any reference to it here in advance of the proposed Framework Plan.

9.19.8. Because the Chesterton Sidings part of the Area of Major Change also lies outside the Plan area, it would be inappropriate to make any reference to the possibility of a transshipment depot here. Similarly, the means whereby construction materials will be transported to Northstowe, which also lies outside the Plan area, is a matter for Cambridgeshire County Council and South Cambridgeshire District Council to address and not for this Plan.

9.19.9. The former St Ives branch railway where it runs through this part of the Plan area is proposed to form part of the CGB being promoted by Cambridgeshire County Council under the Transport and Works Act 2004. The route of that scheme is not a matter for this Plan. Whether or not the former branch line might form part of a new rail link to Bedford, in respect of which there appears to be no firm proposal, is outside the City Council's control. Under these circumstances it is appropriate that the route the subject of the County Council's proposal should be safeguarded under Policy 8/8 of the RDD for HQPT purposes and identified in Figure 9/6. If for any reason the CGB did not proceed the former railway would remain safeguarded for public transport.

9.19.10. The transport network for this Area of Major Change is required by Policy 9/2 of the RDD to be agreed before any development takes place. However, details of the network, including links between the development area and neighbouring areas and bus routes serving the area, have not yet been worked up. It would not be appropriate to make reference to any specific transport proposals in advance of this work having been done.

9.19.11. Policy 9/3 and Policy 9/6 both set out requirements relating to footpath and cycle routes. The Council is also proposing a change to Chapter 8 to include in the Plan a reference to the Cam Too Project. It is unnecessary to make any more detailed reference to cycle routes in the Plan. The Council in its SPG on the future expansion of the City's cycle network identifies a bridge across the Cam as a high priority, and is also proposing a change to Chapter 8 of the Plan noting the proposal for such a bridge. However, a requirement for the bridge to be provided as part of the Northern Fringe redevelopment would not be warranted. The bridge would be located some way outside the Area of Major Change and its desirability does not arise solely or mainly as a result of the redevelopment of that area.

9.19.12. The widening of the A14 is now included in the Phasing Table in the RDD, but I have recommended above that the development of the Sidings should not be dependant on works to, or associated with, the A14. The Plan does not propose direct access onto the A14, but rather that access to the A14 should be via the Milton roundabout. The Policy also encourages the expansion of existing bus services and the provision of an integrated transport interchange to cater for various modes of transport. It is not necessary to make any further changes to the Plan in respect of access matters, bearing in mind that further work on this will be

required at the master planning stage.

9.19.13. The widening of the A14 is now included in the Phasing Table in the RDD, but I have recommended above that the development of the Sidings should not be dependent on works to, or associated with, the A14. The Plan does not propose direct access onto the A14. I have recommended changes to the Phasing Table (see Section 9.14 above) in relation to the requirements for the Northern Fringe. In the interests of consistency it would be appropriate for Criterion j of Policy 9/6 to be modified to reflect that change. The Policy also encourages the expansion of existing bus services and the provision of an integrated transport interchange to cater for various modes of transport. It is not necessary to make any further changes to the Plan in respect of access matters, bearing in mind that further work on this will be required at the master planning stage.

RECOMMENDATION

9.19.14. I recommend that the RDD be modified as follows:

Delete criterion j of Policy 9/6 and insert "j – Development at Chesterton Sidings will be accessed from Milton Road, with an additional new access road to the remainder of the development from Milton Road/Milton A14 junction and improved linkages to Chesterton."

9.20 PARAGRAPH 9.29

Objections

Turnstone Estates

47/8/DEP02/09_29

Summary of Objections

- The final sentence of the paragraph needs clarifying.

Inspector's Reasoning and Conclusions

9.20.1. Policy 9/6 assumes that the Cambridge WWTW will become available for redevelopment. No information is available as to what forms of development might be considered suitable if this did not happen, and it is not therefore possible to add further clarification to the final sentence of paragraph 9.29.

RECOMMENDATION

9.20.2. I recommend no modification to the RDD.

9.21 FIGURE 9/6

Objections

Turnstone Estates

47/7/DEP02/09_F06

Summary of Objections

- The "key indicative road link" should be clarified.

- The housing area should skirt round the Cowley Road industrial area.

Inspector's Reasoning and Conclusions

9.21.1. According to paragraph 9.30 of the Plan, road access will need to be resolved through the master planning process. However criterion j of Policy 9/6 gives an indication of the requirements for a new access road from the A14 via the Milton Road roundabout. Figure 9/6 is merely a diagrammatic representation of that criterion, and there is no need for any further detail to be given at this stage.

9.21.2. There is no evidence available to support the suggestion that it will not be possible to relocate existing industrial occupiers at Cowley Road. I do not, therefore, support the drawing back of the indicative housing area shown on Figure 9/6 to exclude that part of the site.

RECOMMENDATION

9.21.3. I recommend no modification to the RDD.

LAND BETWEEN MADINGLEY ROAD AND HUNTINGDON ROAD

9.22 POLICY 9/7, PARAGRAPHS 9.34 AND 9.39, AND FIGURE 9/7 (IN PART)

Objections to Policy 9/7

The objections to this aspect of the plan are listed in Annex 3.

Objections to the Paragraphs and Figure

The Chancellor, Masters and Scholars of the University of Cambridge
The Chancellor, Masters and Scholars of the University of Cambridge
The Chancellor, Masters and Scholars of the University of Cambridge

33/9/DEP02/09_34

33/12/DEP02/09_39

33/8/DEP02/09_F07

Pre-Inquiry Changes: SC9.027, 9.028, and 9.032
Further Proposed Changes: FPCs 6, 7, 8, 14, 15 and 16

Summary of Objections

- There are objections to the principle, scale and phasing of development.
- A Master Plan is needed, and the University has prepared one. This should be refined and agreed by the Council as soon as possible.
- The distinction between college-owned and University land should be understood.
- The key worker housing requirement is too high.
- The Local Plan is over-prescriptive in dealing with dwelling numbers, and land uses.
- Road proposals and related matters are objected to.
- The Green Belt, green corridors and open space should be given more prominence, or treated differently.

- Design should retain important existing features and reflect the character of neighbouring development.
- There are several more detailed objections by the University.

Inspector's Reasoning and Conclusions

The Principle and Scale of Development

9.22.1. Structure Plan Policy P9/2c requires the Local Plan to make provision for housing and mixed use development on land to be released from the Green Belt between Madingley Road and Huntingdon Road. The land is to be reserved for predominantly University-related uses. The Local Plan is unable to avoid this release of Green Belt land, and I will not attempt to question the Structure Plan proposal.

9.22.2. The scale of development required by regional guidance and the Structure Plan will inevitably lead to some loss of open land, and this has been taken into account in the strategic plans affecting the City. Wherever the growth of development is proposed there is likely to be temporary construction disturbance and additional traffic.

9.22.3. The scale of development in this Area of Major Change reflects the likely needs of the University. Those needs should be met in view of the wide benefits to be derived from the further growth of the University. It will be for master planning in particular to mitigate the effects of the development.

9.22.4. The University is making preparations for the development of the Area of Major Change. The need to release land from the Green Belt will not delay development. Some market housing will be provided.

9.22.5. I deal with the former Blue Circle land above, as an omission site. The NIAB land on the opposite side of Huntingdon Road is not owned by the University and could not provide the land for the University's expansion.

Master Planning

9.22.6. There have been a large number of proposed and suggested changes to the Policy and its supporting material. Nevertheless there remain major areas of difference between the Council and the principal objector, the Chancellor, Masters and Scholars of the University of Cambridge, referred to here as the University.

9.22.7. The University has prepared an indicative Master Plan for the area, including land in South Cambridgeshire District. The University asks for recognition that a Master Plan will be the only further guidance needed before development can start at this Area of Major Change. The Council, says the University, should refine and agree the Master Plan framework as planning guidance at an early stage, to act as a guide to the preparation of an Area Action Plan (AAP) and to enable planning applications to be considered quickly, pending the adoption of the AAP.

9.22.8. The University's Master Plan indicates a large area of development in South Cambridgeshire. There has been some involvement on the part of that Council in the preparation of the Master Plan. However the evidence that South Cambridgeshire District Council is committed to the indicative proposals shown in the Master Plan, or indeed to progressing the Master Plan at all, is not convincing. South Cambridgeshire District Council has committed itself to the preparation of the AAP with the City Council. The City Council is also committed to the AAP but is not willing to adopt the Master Plan proposals, at least not yet.

9.22.9. The timetable for the production of the AAP is challenging but the Council

justifies it on the basis that experience shows where substantial time savings can be made. The decision to include land between Huntingdon Road and Histon Road in the AAP was under review at the end of the inquiry, but the Council's evidence was that the inclusion of land up to Histon Road was still the official position at that time.

9.22.10. Even if the AAP is prepared as quickly as the local authorities anticipate, the AAP would not be adopted until the end of 2007. It is argued by the University that the course of action upon which the Council is set will delay the provision by the University of much-needed key worker housing, provision which would also have the effect of releasing existing housing onto the market. No other body would provide so much key worker housing so quickly. There is however a significant area of land in the south-eastern part of the Area of Major Change which is allocated for University residential and other University-related development in the current Local Plan and could have been developed before now. The University considers that a planning application for this area cannot be prepared until the Master Plan has determined the land use arrangement for the area generally and provided policies against which to judge applications. My opinion is that the weight which attaches to this argument is lessened by the form of the University's indicative Master Plan, which shows substantial development in the south-eastern sector. I give weight to the Council's willingness to consider applications here before further guidance is adopted. Policy 9/1 allows some flexibility to bring forward land for development early. No more references are necessary in relation to such early development.

9.22.11. In view of the importance of the role of South Cambridgeshire District Council (not to mention the County Council), and the City Council's limited level of commitment to the Master Plan's proposals, I conclude that I should not make a binding recommendation to require the Council to place the degree of weight on the Master Plan suggested by the University. The weight of the argument in favour of the adoption of the Master Plan before the AAP because of the urgency of providing key worker housing is insufficient to change that conclusion.

9.22.12. I therefore do not support the changes put forward by the University with regard to the Master Plan and references to development in South Cambridgeshire. On the other hand the Council's proposed changes to Policy 9/1 and its supporting text reflect the general need for further policy to be provided for Areas of Major Change via the planning work the Council intends to carry out (see Section 9.8 above).

9.22.13. The University wishes to see the potential for development in South Cambridgeshire indicated on the Local Plan's Figures 1 and 9.7. As it is not known whether South Cambridgeshire District Council will support development in its area this should not be done. The Council's suggested change to paragraph 9.39, with an indication in Figure 1 that the Area of Major Change extends across the boundary, is as far as the Local Plan should go. However the suggested change refers also to land north of Huntingdon Road. This reference is the subject of objection and the intentions of the 2 local authorities with regard to the inclusion of land north of Huntingdon Road in an AAP was not entirely clear in the late stages of the inquiry. FPC8 should therefore be amended.

9.22.14. There is no evidence that the development of the Area of Major Change would be harmful to a possible Conservation Area based on Huntingdon Road.

Phasing

9.22.15. The Council changed its position considerably during the inquiry and its suggested changes to the phasing element of Policy 9/7 result in wording which is not far removed from that put forward by the University. As the University points

out in its last representation, the actual difference between the south-eastern part of the Area of Major Change and the remainder is that it is not necessary to show need in order to secure the development of the former area. The land has already been removed from the Green Belt and has been available for development for some years. In my view it would be wrong now to indicate that its development should await further guidance or proof of need.

9.22.16. To justify development elsewhere in the Area of Major Change, need has to be shown, and this should be indicated in the Policy wording. I prefer the University's wording generally, as a result of the above factors, with minor alteration to recognise the AAP which is to be prepared. There is agreement between the Council and the University that the need for University residential accommodation has been established. This is sufficiently important to be mentioned in the supporting text. My conclusions with regard to the phasing of these sites have consequences for the Proposals Schedule and Proposals Map.

9.22.17. Work on this area is insufficiently advanced to allow the Plan to indicate which areas will be safeguarded until after 2016. The Master Plan and AAP will deal with phasing.

Key Worker Housing

9.22.18. Although the Council has argued that the Structure Plan wording requires around 60% of the housing to be key worker housing for University or College staff, that does not seem to me to be an accurate interpretation of the Structure Plan. In my view, provided that the whole site is used for predominantly University related uses, then there is no requirement under the Structure Plan for a predominant amount of the housing to be University related.

9.22.19. Having said that, part of the University's justification for the release of this land is the significant need for key worker housing for University staff, over which there is no dispute. The case for this was accepted in the EIP Panel report. It would therefore be inconsistent with part of the rationale for the allocation, as well as undermining the objective of increasing the amount of key worker housing for University staff, not to include a significant proportion of key worker housing in the development.

9.22.20. However, in determining what that proportion should be, the question of viability cannot be ignored. The University has produced detailed information concerning the viability of development on the whole Master Plan site. The assessments necessarily make a number of assumptions concerning future development which may or may not be borne out, including assumptions as to the extent of development in South Cambridgeshire, and as a result need to be treated with a degree of caution. Nevertheless, it is clear that a requirement for 70% key worker housing would not result in a viable development, and that was accepted by the Council at the Inquiry.

9.22.21. In the light of this, the Council suggests that the two alternative approaches are either to discard any percentage target altogether and instead require the provision of "predominantly" key worker housing, or alternatively to determine the highest feasible percentage figure as a target. I share the University's concern that without a target, there would be an absence of certainty which would cause difficulties in the planning of such a large development. On balance, and bearing in mind the significance of what the University proposes both for itself and for the achievement of the strategic vision for the Cambridge Sub-Region, I consider that the policy should contain a specific target to give the University some certainty.

9.22.22. Turning now to what the target should be, the University's viability

assessments use a number of alternative scenarios as to dwelling numbers over the whole Master Plan area and as to different ratios of affordable to market housing. The assessments show a slight negative deficit for 2000 dwellings and a 50:50 affordable to market housing mix, but a positive land value, albeit small, with a 2500 dwelling development and a 50:50 mix.

9.22.23. The Council acknowledges that the overall methodology of this exercise is sound, but questions a number of the assumptions made. It argues that by altering some of the assumptions, it can be shown that a 60% affordable housing requirement would produce a positive land value.

9.22.24. However, even on the basis that the Council's alternative assumptions are valid (and I find the evidence less than convincing on this point), the resulting land value would represent only a small percentage of the completed value of the development, and a small reduction in receipts or increase in costs would result in the development having a residual negative value. I accept that the University, as a charity, is more constrained as to the risks it can take than a commercial body might be, and that it would be unreasonable to expect the University to commit itself to the risks inherent in the 60:40 scenario envisaged by the Council.

9.22.25. There will be fluctuations in market conditions and changes in the assumptions made here over the development period. These are unlikely to lead to a significant improvement in viability, bearing in mind the risks inherent in construction projects and the tendency of actual construction costs to overrun, even if values may also rise. On the basis of the evidence before me, therefore, I conclude that a 60% affordable housing requirement would not represent a viable option for the University. I have taken account of the Council's doubts as to whether it is appropriate for the University to assume a 20% developer return, but such a return would not be unreasonable or unusual in a development of the size and complexity proposed here.

9.22.26. However, the difficulties in predicting such matters over a long period do lead me to the view that it would be appropriate to include a target of 50% of affordable housing in the policy. Notwithstanding the University's viability assessment for that 50% requirement, the possible effect of changing various of the assumptions used, demonstrated in the Council's evidence, persuades me that such a target is justifiable, given the high level of identified need for University key worker housing. In addition, of course, it is possible that the University may wish to provide a higher portion of key worker housing, bearing in mind the importance of the provision of adequate housing to the successful achievement of the University's development aspirations. For that reason it would not be appropriate to include "up to" before the target figure.

9.22.27. As drafted, the policy is inflexible in the amount of affordable key worker housing to be provided. The Council acknowledges that the provisions of Policy 5/5 concerning the taking into account of particular costs would apply here. In my view, it is in the interests of clarity in this important area for Policy 9/7 to repeat the wording in Policy 5/5. The use of the word "must" fails to recognise the need for viability to be taken into account, and should be replaced by "should".

9.22.28. The modifications I am proposing would leave phasing to be dealt with in the Master Plan and AAP. The Council is concerned that in the absence of a requirement for the affordable housing target to be achieved in each phase of development, the key worker housing will be left until last and on the worst parts of the site. In the absence of any clarity at this stage over the precise phasing of the development, it would be preferable for the policy to remain silent on the matter.

9.22.29. In my view, the relationship between Policy 5/5 and Policy 9/7 is not clear. I therefore propose the addition of a sentence clarifying that compliance with Policy 9/7 will satisfy the requirements of Policy 5/5. It is not necessary for the policy to set out a fallback position in the event that it is not possible to develop enough key worker housing, as in those unlikely circumstances the wording I propose would not provide exemption from compliance with Policy 5/5.

Road Proposals

9.22.30. Policy 9/7 allows access to this Area of Major Change to be taken from Madingley Road as well as Huntingdon Road. An access point on Madingley Road between the edge of the City's built-up area and the M11 would be close to Junction 13 on the motorway. It is possible that the scale of development will be such as to affect the operation of the M11, requiring mitigation of the impacts. This is a point made by the Highways Agency as well as the Council. In the circumstances the reference in the Policy to the M11 should remain. However the bald statement that development should contribute towards mitigation measures should be qualified because the need for contributions is not certain. The Highways Agency has concerns about northern slip roads at Junction 13, and it seems to me that there is insufficient evidence that such slip roads will be both required and suitable. The reference to them should not be kept.

9.22.31. I am unaware of any national policy excusing the agencies and land uses involved in developing this Area of Major Change from making contributions to mitigate the impacts of their developments.

9.22.32. Policy 8/11 is directed to the prevention of 'rat-running'.

Green Belt, Green Corridors, and Open Space

9.22.33. The Local Plan is to include detailed revisions to the Green Belt boundary. This is necessary to accommodate the proposed development.

9.22.34. The Structure Plan reference to the area included as this Area of Major Change in the Local Plan is (land) "between Madingley Road and Huntingdon Road". This need not mean all of the land between the 2 roads, but to give the necessary freedom in devising a Master Plan for the area I consider that none of the open land between the roads should remain in the Green Belt. The Structure Plan Key Diagram shows a green corridor north of Madingley Road, and the strong hedge north of the Park and Ride site has the necessary characteristics to form a suitable Green Belt boundary. However the Key Diagram is diagrammatic, and the hedge line is some distance north of Madingley Road, well inside the area between the roads. In my opinion the open land north of Madingley Road is not prominent to travellers on the M11, as views of it are limited. I conclude that the land is not so fundamental to the purposes of the Green Belt as to warrant Green Belt designation in the present circumstances obtaining here. A change to the Proposals Map is necessary – see Chapter 14 below.

9.22.35. A green corridor (shown diagrammatically on Figure 1 in the Plan) should be provided through the Area of Major Change. Its precise whereabouts and the boundaries of the Green Belt should be established in the Master Plan and AAP. It may be that the Master Plan will show that the hedge line referred to above is the most suitable Green Belt boundary which is capable of enduring, but this is a matter to be assessed in the context of an analysis of all the factors which the Master Plan and AAP will take into account. The University's Master Plan does not indicate building in this area, but the Master Plan is only indicative at this stage. As at East Cambridge, following the completion of the Master Plan suitable land can be added back into the Green Belt via the AAP. As a consequence of my recommendation regarding the land to be shown as the Area of Major Change, the

area measurement in Plan paragraph 9.35 will need to be amended. The Council has not commented on the figure given by the University, so my recommendation uses an approximate figure.

9.22.36. Similarly further work will determine the location of the green corridor which will fall within the Proposals Sites in the Area of Major Change. It is not yet known what will be proposed beyond these sites, in South Cambridgeshire. However the M11 should have an open space buffer because at present the M11 runs largely through countryside west of Cambridge.

9.22.37. In my view the green corridor is of sufficient importance to require reference in the reasoned justification supporting Policy 9/7. The University provides some suitable wording, but I leave to further work the question of how the green corridor should be protected from development.

9.22.38. There is general agreement between the Council and objectors to Policy 9/7 that there should be an open buffer between the City and Girton. Some of the buffer would fall within this Area of Major Change and within the City boundary. SC9.027 indicates that some of the strategic gap between the 2 settlements is Green Belt. In the case of this land the function of preventing coalescence is sufficiently important for the reference to Green Belt to be justified. However it seems to me that the main function of the open land within the City is to help to prevent coalescence rather than to preserve the setting of Girton, and this should be made clear in the Policy. I prefer the University's version of the first sentence of element (i) of the Policy, but the second sentence should be retained because of the strategic function. My recommendation incorporates SC9.027 and the other matters discussed here.

Other Matters

9.22.39. Policy 9/7 and its supporting text contain a considerable body of material which will guide the layout and design of new development, and which will lead to the conservation of important features on the site. Other policies of the Plan are relevant in this regard. As a matter of principle the Plan should not be over-loaded with detail. Hence it is sufficient that there are references to the substantial vegetation cover, without the need to refer to particular groups of trees. Views and Conservation Areas are also mentioned in the text, and the Council is aware of their importance. Lighting and the demands of traffic will be taken into account in the Master Plan and planning applications. The same applies to open space provision, but in the light of the need to accommodate the further development of the University I conclude that the Plan should not specify that there should be 30-40% open space provision.

9.22.40. Many of the matters raised by the University have been met by proposed or suggested changes, which I support. There are some amendments in the University's version of the Policy and supporting text which the University does not specifically justify. As a matter of general principle I will not add material to the Plan where there is no justification. Finally as the footpath referred to in paragraph 9.38 is outside the City I agree that the reference to it should be deleted (FPC7).

Figure 9.7 and Figure 1

9.22.41. The University's version of Figure 9.7 is too detailed in view of the lack of local authority commitment to the proposals of the Master Plan. Bearing in mind the existence of Figure 1 and the Proposals Map, one result of my recommendations is that a separate diagrammatic representation of proposals in this Area of Major Change is not required. In particular the Proposals Map will show, precisely, those proposals which are firm. As the Council says, this Area of Major Change is at an early stage of preparation, and in my view there is a limited

amount that can be shown with any certainty. Figure 9.7 should be deleted, insofar as it affects this Area of Major Change, along with paragraph 9.40 which explains the Figure.

9.22.42. Figure 1 as far as it affects this area should show the Area of Major Change extending as far as Madingley Road and the M11, to reflect my other recommendations.

RECOMMENDATION

9.22.43. I recommend that the RDD be modified as follows:

a) incorporate SC9.028 and FPCs7, 15, and 16.

b) incorporate FPC14 but with the following amendments:

1) delete the paragraph of Policy 9/7 which deals with phasing and replace with "The whole site straddles the City-South Cambridgeshire boundary and the phasing of development will be established in a site-wide Master Plan and AAP. However site 9.12 can be brought forward for development at any time and the development of site 9.07 should take place only when the University can show a clear need for the land to be released (as defined above)."

2) delete element (d) of Policy 9/7 and replace with "up to 26 hectares of housing, indicative capacity 1,150 dwellings. 50% of this should be key worker housing for University or College staff, but account will be taken of the viability of the development, any particular costs associated with the development and whether there are other planning objectives which need to be given priority. Compliance with this requirement will satisfy the requirements for the provision of affordable housing set out in Policy 5/5."

3) delete element (i) of the RDD Policy and replace with "retain a green corridor between Huntingdon Road and Madingley Road and avoid coalescence between Girton and Cambridge. This green corridor should link with the strategic gap (part of which is designated Green Belt) which straddles Huntingdon Road between Girton and Cambridge;"

4) delete element (t) of the RDD Policy and replace with "if necessary, development should contribute to measures to mitigate any significant adverse traffic impacts on the M11 and the surrounding highway network."

c) insert into paragraph 9.34 a new sentence, to read "The need for University key worker housing has been established."

d) insert a new paragraph, to be numbered 9.35, between existing paragraphs 9.34 and 9.35, to read "A key feature of the development will be the creation of a green corridor running through the site from Madingley Road to Huntingdon Road and alongside the M11. This corridor will be identified in the Master Plan, is expected to be dedicated for public access and recreation, and will be protected from development."

e) delete existing paragraph 9.35 and replace with "The total area of land within the Area of Major Change in the City is -----" (figure to be added after measurement).

- f) incorporate FPC8 but with the deletion of the latter part of the third sentence, which should finish with the word "area".
- g) delete paragraph 9.40 (see below re Figure 9/7).
- h) delete Proposals Site 9.08 from the Proposals Schedule.
- i) make the following series of changes to Proposals Site 9.07:
- i. Delete "Phase 2" from the address.
 - ii. Provide a new figure for the site area, to take account of the site's combination with site 9.08 and the inclusion of land to the south (see recommendation (b) in Chapter 14).
 - iii. Delete the first line in the Comments column and replace with "To be released for development only when the University can show a clear need. Details to be determined in Masterplan, including the boundaries of Green Belt and green corridor".

9.23 FIGURE 9/7 (PART)

Objections

NIAB and others
South Cambridgeshire District Council

34/8/DEP02/09_F07
461/46/DEP02/09_F07

Pre-Inquiry Changes: SC9.032

Summary of Objections

- The Figure should show development potential in South Cambridgeshire but not Green Belt areas in the City.
- Omit the open space notations on the NIAB land and the Green Belt adjacent to it in South Cambridgeshire.
- Continue the Green Belt notation up to Histon Road.

Inspector's Reasoning and Conclusions

9.23.1. I consider above the University's objections, and conclude that there is little to show on the Area of Major Change which covers the University land.

9.23.2. The Proposals Map includes the Area of Major Change for the Huntingdon Road/Histon Road area. Figure 1 shows this, and the open space corridor in the adjoining part of South Cambridgeshire, extending up to Histon Road. The open space notation reflects the existing situation. In my opinion there is no pressing need for the presence of Green Belt in the South Cambridgeshire District to be shown diagrammatically in the Local Plan for Cambridge City.

9.23.3. There are only 2 other matters shown on Figure 9/7 which are not shown on other plans, namely a small area of open space fronting Huntingdon Road, and the words "Sports Provision" superimposed upon the residential colour wash in the south-eastern part of the Area of Major Change. The latter is referred to in Policy 9/8(c) and in the relevant part of the Proposals Schedule (Site 9.03) and does not need a third reference.

9.23.4. In my view even if the open space on the road frontage is retained or replaced as part of the development of the Area of Major Change the area is small

for the scale of Figure 9/7. The planning permission which has been granted to develop this site might not be implemented, in the light of the overall proposals for the Area of Major Change, but if it were it would require an even smaller open space. The Council referred to the notation as "indicative" at the inquiry. There is no reference to the area of open space in Policy 9/8, although the buffer between Girton and the City could possibly include the land. I conclude that the need to show the area is not such as to justify retaining Figure 9/7 in the light of my conclusions regarding the role of the Figure in relation to the University's proposals.

9.23.5. Overall my conclusion is that Figure 9/7 adds little to the Plan and should be deleted in the interests of producing a short and succinct plan. There is a consequent effect on paragraph 9.44.

RECOMMENDATION

9.23.6. I recommend that the RDD be modified by the deletion of Figure 9/7 and of paragraph 9.44.

LAND BETWEEN HUNTINGDON ROAD AND HISTON ROAD

9.24 AREA ACTION PLAN 4 (FDD), AND POLICY 9/8 AND PARAGRAPHS 9.41 AND 9.43 (RDD)

Objections to AAP4 and Policy 9/8

The objections to this aspect of the plan are listed in Annex 3.

Objections to Paragraphs 9.41 and 9.43

Windsor Road Residents
Windsor Road Residents

366/61/DEP02/09_41
366/61/DEP02/09_41

Pre-Inquiry Change: SC9.029

Summary of Objections

- There are objections to the principle, scale and density of development; loss of Green Belt; and traffic impact.
- There is a series of detailed objections to the way in which the area might be developed, involving such matters as access, open space and buffer provision, the availability and provision of services, landscaping, design, and land use proposals.

Inspector's Reasoning and Conclusions

The Principle of Development

9.24.1. Structure Plan Policy P9/2c requires the Local Plan to make provision for housing and mixed use development on land to be released from the Green Belt between Huntingdon Road and Histon Road. The Local Plan is unable to avoid this release of Green Belt land, and I will not attempt to question the Structure Plan proposal. The scale of development required by regional guidance and the Structure Plan will inevitably lead to some loss of open land, and this has been taken into account in the strategic plans affecting the City.

9.24.2. The need to release land from the Green Belt will not delay development, and there are relatively few constraints on development in this Area of Major Change. Land owners are keen to progress development. I deal with the former Blue Circle land above, as an omission site.

9.24.3. The County Council is carrying out a County Strategic Transportation Study, referred to elsewhere in this report. Before development takes place here a full TA will be undertaken, involving a consideration of the effects of other proposals as well as this one. The assessment can also take account of local conditions and features like the width of Histon Road. Necessary provision of highway and other transportation schemes to cater for traffic impacts will be made, and development will be phased if necessary. Builders will contribute as necessary to the mitigation of traffic and other impacts which arise from their developments. Similar considerations apply to drainage effects of building.

9.24.4. Development will have some impact wherever it is located, but the possible strategies for catering for development needs have been examined in the strategic planning process, which has resulted in the choice of this site amongst others. Further work will identify what impacts of developing here need to be planned for.

The Scale of Development, and Open Space Provision

9.24.5. The indicative capacity of the Area of Major Change is given as 1,780 dwellings, in Policy 9/8. The present Sidney Sussex and Christ's College sports ground, a private sports ground, could be built upon without the loss of the facility, for which there are relocation opportunities in South Cambridgeshire. These opportunities are close to the existing sports ground.

9.24.6. Again, for open space for public use, opportunities are offered by open land available in South Cambridgeshire and in the ownership of developers. The views of South Cambridgeshire District Council on the location of open space in their area have not been canvassed specifically, but that Council is supportive of the Area of Major Change development overall. In calculating estimated dwelling capacity it is reasonable to take account of possibilities on neighbouring land. The area is near to the open countryside, but the Council intends to provide open space to its standards. This would result in enough open space to provide a 'green lung', possibly forming part of the open space buffer considered below. In addition, for some built uses there is also the possibility of using land in the University's Area of Major Change (see above). Existing residents would be able to use facilities provided in new developments, but it would not be reasonable to expect new housing to provide facilities merely to make up for existing deficiencies.

9.24.7. The Council's estimate of dwelling capacity is based on subtracting from the total area available an allowance for various non-housing uses. Using the methodology developed in the Sub-Region Study this results in a developable area, to which the density estimate is applied, of about 40 hectares. As for the density figure to be applied to the land available, again the Council has used the density used in the Cambridge Sub-Region Study. The Study characterises the area as outer urban, a characterisation which seems correct to me. Further discussion of the rationale behind the density assessments of the Areas of Major Change is given in Chapter 5 of this report. The choice of density for this area must be made in the light of national and Structure Plan policies favouring higher densities, and should not be based on existing densities.

9.24.8. The Council's dwelling capacity estimate is satisfactory, and the scale of development is not over-estimated. This is not and does not have to be an exercise in determining the capacity down to the last dwelling.

9.24.9. The requirement to provide an open space buffer between Cambridge and Girton is the subject of objection. I am satisfied from my site visits that there is a significant separation between the two, appreciated from Huntingdon Road, and that the separation should be retained. The Felix Hotel has an undeveloped frontage. Opposite is open land forming part of the University Farm, and behind the Hotel are playing fields.

9.24.10. The open space buffer might include land in the City, as there is sufficient land in the Area of Major Change within the City. It is right that the Policy should refer to the buffer in general, and to the Green Belt as there is the potential to add to the Green Belt, using land in the City, when the AAP or Master Plan is prepared (SC9.029). Any such buffer or Green Belt land would not need to be deducted from the area of the Area of Major Change, for reasons given above.

9.24.11. Residential use in one area does not need protection from housing in an adjacent area, as housing as a land use is not likely to harm the amenities of residents. No open space buffer is needed to protect existing houses from new residential development.

Other Matters

9.24.12. Many objections have been satisfied by the new Policies 9/1-9/3 and the complete rewriting of this part of the Plan in the RDD. In particular Policy 9/8 does not permit access via Windsor Road to the new development in the Area of Major Change.

9.24.13. This and other Policies envisage the provision of a primary school and other facilities. Actual provision of facilities will be the responsibility of various agencies, which may be assisted by developer contributions. The principal land uses are specified in Policy 9/8. The area is not seen as suitable for commercial and industrial development, although local shops might be allowed.

9.24.14. Other objections ask for references in this part of the Plan to matters which are dealt with in other sections of the document. Phasing is the subject of Policy 9/2, and noise pollution from the A14 falls within the purview of Policy 4/12, to give examples. In general, it is not necessary to include cross references to other policies of the Plan. Sustainability considerations are important, the Plan recognises this, and the Plan is to be read as a whole.

9.24.15. Policy 9/3, following the lead given by the Structure Plan, requires further guidance to be produced for Areas of Major Change. As at the end of the inquiry, the Council and South Cambridgeshire District Council were intending jointly to prepare an Area Action Plan, although the decision to do so was under review. Several objections are concerned with detailed matters which should be the province of the proposed AAP or Master Plan for this Area of Major Change. Others ask for detailed additions to the Policy and supporting text. These additions need not be included in the Local Plan. As a more finely tuned planning document is proposed for this specific area, this Local Plan can be restricted to the precise allocation of land for development and to setting out the principal policy requirements for that development. In my view it would be including too much detail to show, for example, the form and location of any possible access to Histon Road, even if these details were known. I reach the same conclusion regarding public transport information, landscaping and design, and how/which hedgerows and footpaths will be retained. Bearing in mind the various policies in the Plan, it is sufficient for paragraph 9.41, for example, to take account of existing character and other desirable features.

9.24.16. Policy 9/8 is already lengthy. The inclusion of the material suggested by objectors would result in a wordy and over-prescriptive policy. At the time of the

inquiry it was too early to say whether some of the matters requested by objectors could be provided, or how particular provision would be made.

9.24.17. Thus it would be too prescriptive to say at the moment how much open space would be included in the development of the area, and how wide the open buffer between the City and Girton would be. Nor can traffic and transportation proposals be put forward until the TA has been prepared. The decision of the First Secretary of State on the CGB was awaited at the end of my inquiry. The questions of a through road between Huntingdon Road and Histon Road, and of public transport penetration into residential streets, must also await the outcome of the TA and other analysis. The relevant agencies are experienced in such work, and the Local Plan does not require such additions as a direction to them to use appropriate methodology.

9.24.18. I deal elsewhere in this report with objections relating to enforcement and similar matters, and concerning consultation. Development outside the City is not a matter for this Plan.

9.24.19. However I deal here with an objection to Site Number 4.27 in the Proposals Schedule in the FDD, because this objection has been included by the Council under reference AAP4. The site is now numbered 5.18 in the RDD. If the site were to become available for development I see no reason why it should not be developed for housing, subject to Policy 6/1 of the Plan.

RECOMMENDATION

9.24.20. I recommend that the RDD be modified by the incorporation of SC9.029.

STATION AREA

9.25 AREA ACTION PLAN 5 (FDD) AND POLICY 9/9 (RDD)

Objections to Area Action Plan 5

The objections to this aspect of the plan are listed in Annex 3.

Objections to Policy 9/9

Rose Lockwood
James Martin
RLW Estates
Ashwell Developments Limited

Dr. J.I. Coates
R. T. Sinfield
Ceri Galloway
Turnstone Estates Ltd

756/1/DEP02/09_P09
759/1/DEP02/09_P09
774/1/DEP02/09_P09
786/1/DEP02/09_P09
786/5/DEP02/09_P09
790/4/DEP02/09_P09
793/2/DEP02/09_P09
805/3/DEP02/09_P09
833/1/DEP02/09_P09

Summary of Objections

- The boundary of the Area of Major Change should be altered.
- There are objections relating to accessibility requirements.
- Concerns are expressed regarding traffic implications of the policy.
- Objections are made to the provision of, and restrictions on, car and cycle parking at the station and in respect of individual developments.

- Objections are made concerning the timing and details of development in the area, including scale, quantum of residential and commercial floorspace, and the effect of development on adjoining properties.
- Contributions towards infrastructure should be subject to negotiation and to Government advice on planning obligations.

Inspector's Reasoning and Conclusions

Boundary of Area of Major Change

9.25.1. The boundary of this Area of Major Change covers the main area where major change is anticipated, being actively promoted or likely to be directly affected by development. There would be nothing to prevent proposals for development outside the boundary coming forward, but they would be dealt with on their merits. There is no justification for extending the boundary to include Three Crowns House, which is some way from the Station Road area.

9.25.2. I deal below with the question of use of the Cambridge Leisure Complex car park in connection with the Station Area, but as no major change is being proposed at the Cambridge Leisure Complex nothing would be gained by making this recently redeveloped area subject to Policy 9/9. There appear to be no current proposals for either Pickfords or Royal Mail, both within the Clifton Road industrial area, to vacate their sites, and as no major change is being promoted in that area either it would also be inappropriate to make it subject to Policy 9/9. I deal in Chapter 11 of this Report with the application of Policy 7/3 to these sites.

9.25.3. Objectors argue that the need to deliver station improvements and enhanced services, together with additional connections across the railway line, could be hampered if the land occupied by Royal Mail and Pickfords is not included within the Area of Major Change. Network Rail considers that adding an island platform at the station would be a desirable improvement which would enable service enhancements. But no funding for this scheme has been identified, there is no indication as to whether it is likely to proceed, and there is no evidence that any parts of the Pickfords or Royal Mail sites would be affected. In the light of that, the inclusion of any part of these sites within the Area of Major Change would not be warranted.

9.25.4. Any pedestrian route to link the Cambridge Leisure Complex with the station, running through part of the existing industrial site, would also be completely dependent on the scheme for an island platform at the station, as it would join an extended pedestrian bridge linking existing and island platforms. As there is no certainty as to whether such a scheme will ever be implemented it would be inappropriate and unrealistic to make provision for the pedestrian route in this Plan, even though such a route would be significantly shorter than existing routes from the station to the Cambridge Leisure car park.

9.25.5. The Plan gives no indication as to what role the goods sidings to the east of the railway line area might play in the redevelopment of the area, although they are included within the Area of Major Change. However, the Station Area Development Framework (CD 6.4.1) indicates that longer-term development opportunities exist for the land and these should not be prejudiced by development around the station. In the light of this, I am satisfied that it is appropriate for the sidings to remain within the Area of Major Change boundary.

Accessibility Requirements and Traffic Generation

9.25.6. Paragraph 9.45 of the Plan sets out the vision for the Station Area as a high-density development centred on HQPT provision. It is unnecessary to make the integrated transport interchange the first item in the Policy under the heading

"principal land uses", as the importance of the interchange to the vision for the Station Area is quite clear from the Plan as drafted and from CD 6.4.1.

9.25.7. The Policy requires a new road linking Station Road to Hills Road, the indicative route of which is shown in CD 6.4.1. There is no convincing evidence to suggest that other access arrangements suggested in some objections would have significant advantages over what is sought in the Policy. The restriction on the use of the new road to buses, cycles and taxis only is desirable because otherwise additional and undesirable through movements by cars would be likely to be encouraged. No change is warranted to this part of the Policy.

9.25.8. It is a key aim of the Policy to improve transport links in this area. The precise location of new routes (other than that of the CGB, the route of which is to be determined through other procedures) is a matter for subsequent master planning, but the achievement of the Policy aim may well justify interference with private land holdings.

9.25.9. Policy 9/9 (k) requires improved pedestrian and cycle routes, and specifically requires a pedestrian and cycle route from the Carter Bridge towards the station. CD 6.4.1 indicates that a route for cyclists would be required through the area all the way from Brooklands Avenue to the Carter Bridge. It would not be appropriate to include more detail in the Plan itself, or to make any further changes to the Plan to refer to routes proposed by the Cambridge Cycling Campaign. The Plan already refers to cycle use of the new access road to Hills Road, and the other routes suggested are either outside the remit of the Plan, unlikely to be needed within the Plan period, or outside the Station Area boundary.

9.25.10. Some concerns have been expressed that the development proposed in the Policy will lead to greater congestion in the area. However, the area's good transport links make it a highly suitable location for high density residential development and major trip generators such as a hotel. The Policy also seeks improved pedestrian and cycle routes and secure cycle parking, which, together with the integrated transport interchange, are intended to make other modes of transport more attractive to passengers using the railway station. In addition, any development here will be the subject of a TA, and the Council will be able to seek appropriate mitigating measures.

9.25.11. The scheduling and provision of train services and improvements to the station, including additional platforms, are outside the control of the Council, and not within the remit of this Plan.

Cycle and Car Parking

9.25.12. Although the Plan gives no indication of the amount of cycle parking required at the station, CD 6.4.1 requires at least 2,000 spaces with rain protection and good security. There is no evidence that this would be insufficient to meet demand.

9.25.13. The Plan makes no reference to the provision of car parking at the station, although CD 6.4.1 suggests that long stay parking for railway users could be located in a multi-storey car park in line with current numbers. Although there is likely to be an increase in the number of rail passengers using the station, the Plan aims to improve access to the station by a number of different modes of transport, and the proposed Chesterton station in north Cambridge would provide a significant amount of car parking which could free up parking spaces at Cambridge station. It would not be in line with the Council's aim of discouraging unnecessary car traffic in this area, to require an increase in the amount of car parking for rail users, an aim which I consider worthy of support given the heavy traffic congestion in this area throughout the day.

9.25.14. On the other hand, it is also unrealistic to reduce significantly the amount of parking for commuters that is provided at the railway station at present, and indeed this could have the effect of discouraging train use and push existing rail commuters towards private car use, which would also undermine the aim of achieving a shift towards other modes of transport. On balance I consider that the Council's approach is sound, and that no change should be made to the Plan in this regard.

9.25.15. RLW Estates and Turnstone Estates have suggested that the car park at the Cambridge Leisure Complex could be used by rail commuters, thus releasing land within the Station Area for other forms of development. However, even using the proposed new road to Hills Road this car park would be too far from the station to be convenient for commuters. As I have indicated above, there is no indication as to whether a new footbridge across the railway line linking both existing and possible island platforms, and which would make the car park more convenient, is likely to go ahead, at least during the Plan period. Under these circumstances, it would not be appropriate in this Plan to identify the Cambridge Leisure Complex car park as part of the parking provision for the station. If circumstances change, the Council will be able to review the position when preparing or reviewing its development plan documents.

9.25.16. The Station Area is already located in the Controlled Parking Zone, which already exists and is not a proposal of the Plan, and where parking standards are lower than elsewhere in the city. The area is highly accessible by public transport, walking and cycling, and the Plan seeks to improve that accessibility. In the light of that, and given the undesirability of increasing traffic generation unduly in this congested area, it is appropriate that car parking to serve individual developments should be limited as proposed. There is no evidence to support the assertion that restrictions on car parking may prevent development from proceeding, but if any evidence were to be produced the Council would be able to have regard to it when determining planning applications.

Timing and Details

9.25.17. It is not necessary for the Policy to prescribe land uses for individual sites within the area, or to give guidance on the quantum of particular uses that would be appropriate, because these can be assessed at planning application stage. But sub-section (c) of the Policy should be modified to reflect the disaggregation of the former Use Class A3 (see Section 6.14). Numbers of dwellings need not be restricted to the indicative capacity of 650 in the Policy, but will depend upon detailed master planning. There is nothing in the Plan that would prevent proposals for each land holding from coming forward individually, subject to meeting the requirements of Policy 9/1 relating to phasing.

9.25.18. The details of any specific proposals for this area, including the relationships of new and existing buildings and the provision of landscaping including tree planting, are matters more appropriately dealt with at the planning application stage, although guidance is given in CD 6.4.1 seeking high-quality streets, spaces and buildings. Other policies in the Plan will allow the interests of third parties and adjoining residents to be taken into account then.

Infrastructure Requirements

9.25.19. The final paragraph of the Policy refers to planning obligations. It is reasonably clear from the remainder of Policy 9/9, and from other policies of the Plan, that the items referred to here are likely to have to be addressed by any development proposal. The Policy does not preclude negotiation or the application of the tests set out in Circular 5/2005, and there is no conflict with that advice.

The Council's Planning Obligations Strategy 2004 advises that planning obligations will be negotiated having regard to the tests set out in current government guidance and used to secure measures or contributions to address the likely impact of proposed development on the city's infrastructure. The strategy also makes it clear that planning obligations should not be used where the use of planning conditions would suffice. But in the interests of consistency with Policy 9/3, which contains a similar provision, and to aid understanding, I recommend an addition to the supporting text along similar lines to the latter part of paragraph 9.13.

RECOMMENDATION

9.25.20. I recommend that the RDD be modified as follows:

(a) In Policy 9/9 c delete "A2 and A3" and replace it with "A2, A3, A4 and A5".

(b) Insert the following paragraph after paragraph 9.47: "The policy lists some of the general planning obligations for the Station Area although the detail of these will need to be worked out on a site-by-site basis through the preparation of further guidance and/or in negotiations on planning applications."

9.26 PARAGRAPH 9.45

Objections

Dr. P. G. I. Stovin
Network Rail
Robert Cassels
Ashwell Developments Limited

287/4/DEP02/09_45
370/3/DEP02/09_45
666/8/DEP02/09_45
786/2/DEP02/09_45

Summary of Objections

- Parking at the station should be increased and not restricted.
- Commercial considerations should not override any aesthetic aspects.
- A requirement for "best practice in sustainable development" is too inflexible.

Inspector's Reasoning and Conclusions

9.26.1. The issue of parking at the station is dealt with above.

9.26.2. Other policies of the Plan set out the design considerations to be taken into account by developers, and in addition CD 6.4.1 gives guidance on the key issues to be addressed in designing development in the Station Area. The acceptability of the appearance of any development proposals will, however, have to be assessed at the planning application stage.

9.26.3. Paragraph 9.45 states that throughout the site the aim is to achieve (inter alia) best practice in sustainable development. It seems to me that the paragraph is expressing an aspiration rather than a requirement. Whilst "best practice" is a stricter test than the "high standards" referred to in CD 6.4.1, I do not consider it unreasonable for the Council to express a higher aspiration in the explanatory paragraphs to the Policy. It is not inconsistent with guidance relating to other parts of the Plan area to aim for "best practice" only in this part of the Plan area. Nor is there any inconsistency between this aspiration and the advice in PPS 1 that planning authorities should promote high-quality development, bearing in mind

that PPS 1 also advises that sustainable development is the core principle underpinning planning.

RECOMMENDATION

9.26.4. I recommend no modification to the RDD.

9.27 PARAGRAPH 9.48

Objections

Ashwell Developments Limited

786/3/DEP02/09_48

Summary of Objections

- The Development Framework should not be a strict Master Plan for development.

Inspector's Reasoning and Conclusions

9.27.1. Paragraph 9.48 of the Plan indicates that planning applications will be expected to be in accordance with approved guidance, currently the Station Area Development Framework (CD 6.4.1). CD 6.4.1 itself highlights a number of key issues to be considered by developers. However, although it indicates acceptable land uses in the area, it is clear from the document that land uses will be finalised through the detailed master planning process, and there is therefore no conflict with the advice in PPS12 that SPDs should not be used to allocate land. I do not find paragraph 9.48 of the Plan to be overly prescriptive or in conflict with the advice in PPS12 in requiring development to accord with indicative guidance, and the alternative wording suggested by Ashwell Developments Limited would not add clarity to the Plan.

RECOMMENDATION

9.27.2. I recommend no modification to the RDD.

9.28 OMISSION SITE 1: MARSHALL NORTH WORKS

Objections

The Marshall Group Of Companies
South Cambridgeshire District Council
RLW Estates

66/13/DEP02/9_19
461/28/DEP02/09_P04/O1
774/1/DEP03/O1

Pre-Inquiry Changes: SC PM.008

Summary of Objections

- To be consistent with ongoing work on the East Cambridge Area of Major Change, the site should be included in Proposal Site 9.19.

Inspector's Reasoning and Conclusions

9.28.1. The Council proposes to change the draft plan to accord with the objection. The site is largely covered in buildings and hard surfaces. The screening vegetation could be retained in development. As the land is part of the section of the North Works which is located in the City, and is a continuation of Proposal Site 9.19, I see no reason to disagree with the Council.

Recommendation

9.28.2. I recommend that the RDD be modified by the incorporation of SC PM.008.

10. IMPLEMENTATION

10.1 WHOLE CHAPTER

Objections

Cambridgeshire County Council

55/8/DEP01/08

Summary of Objections

- Reference should be made to the Infrastructure Partnership.

Inspector's Reasoning and Conclusions

10.1.1. The RDD now contains a reference to the Infrastructure Partnership established to provide a coordinated approach to the delivery of development in the Cambridge Sub-region.

RECOMMENDATION

10.1.2. I recommend no modification to the RDD.

10.2 PARAGRAPHS 8.3 AND 8.4 (FDD), PARAGRAPHS 10.4 AND 10.5 (RDD)

Objections

Windsor Road Residents

366/39/DEP01/08_03
366/40/DEP01/08_04
366/36/DEP02/10_04
366/37/DEP02/10_05

Summary of Objections

- The reference to material considerations should be clarified. Safeguards should be specified to control developments not in accordance with the development plan, including effective and timely public consultation and penalties for non-compliance. There should be information about consultation mechanisms.

Inspector's Reasoning and Conclusions

10.2.1. In principle, any consideration related to the use and development of land is capable of being a material consideration, depending on the circumstances. It would be impossible to give a comprehensive list of what might amount to "material considerations", and I do not therefore support any change to the Plan in this regard. However, paragraph 10.4 should be updated to refer to Section 38 (6) of the Planning and Compulsory Purchase Act 2004.

10.2.2. This Plan contains the Council's policies on the use and development of land, and it is not appropriate here to include details of the Council's consultation process relating to planning matters. However, the Statement of Community Involvement which the Council is required to prepare under the new development plans system will set out how the Council intends to consult on the preparation of development plans and on planning applications. It is this document, which itself will be subject to public consultation and independent examination, which should

contain details of the Council's consultation process.

10.2.3. It would also be inappropriate for the Plan to contain details of enforcement procedures and penalties. These are set out in various Council publications, and repeating them here would not necessarily make the information more accessible to members of the public, but would merely add to the length of the Plan. The penalties for breaches of planning control are prescribed by statute, and the imposition of penalties is a matter for the Courts.

10.2.4. However, as agreed at the inquiry, it would aid understanding of these processes if the Plan contained a reference to the Planning Portal web site, which contains further information on the planning system. The Council suggested that such a reference should be included in Chapter 1 of the Plan, but it seems to me that paragraph 10.4 would be a better location.

RECOMMENDATION

10.2.5. I recommend that the RDD is modified as follows:

a) In paragraph 10.4 delete the reference to and quotation from Section 54A of the Town and Country Planning Act 1990 and replace with a reference to and quotation from Section 38 (6) of the Planning and Compulsory Purchase Act 2004.

b) Add at the end of paragraph 10.4 "More information on the development control process can be found on the Planning Portal web site (www.planningportal.gov.uk)."

10.3 POLICY 8/2 (FDD) AND POLICY 10/1 (RDD)

Objections to Policy 8/2

The objections to this aspect of the Plan are listed in Annex 3.

Objections to Policy 10/1

Land Securities Group Plc
Cambridgeshire County Council

37/13/DEP02/10_P01
55/69/DEP02/10_P01
55/70/DEP02/10_P01
83/17/DEP02/10_P01
366/38/DEP02/10_P01
385/1/DEP02/10_P01
399/32/DEP02/10_P01

The Bell Educational Trust
Windsor Road Residents
H M Prison Service
Addenbrooke's NHS Trust

Pre-Inquiry Changes: SC10.001, SC10.002, SC10.003

The House Builders Federation

362/3/DEP04/10_P01

Summary of Objections

- The Policy should refer to the joint partnership mechanism required by the Structure Plan.
- Development should not proceed without adequate improvements in infrastructure. Only developments providing infrastructure improvements should be permitted, and there should be more details as to monitoring and enforcement.
- The Policy should include the criteria, for the assessment of infra-structure contributions, set out in government guidance.

- The Planning Obligations Strategy should be part of the Plan and subject to the same scrutiny.
- Education-related and clinical developments should be exempt from infrastructure requirements. Some infrastructure contributions should be made available to NHS trusts.
- Major infrastructure requirements should be identified in the Policy, and there are some objections to the wording of the Policy.
- The Plan should address the need for a prison in the area.
- Waste recycling infrastructure should not be included in the Policy.

Inspector's Reasoning and Conclusions

10.3.1. Paragraph 10.6 of the RDD now refers to the Cambridge Sub-region Infrastructure Partnership.

10.3.2. Policy P9/8 of the Structure Plan requires a comprehensive approach to the securing of infrastructure to support the development strategy for the Cambridge Sub-region. The Policy identifies a number of infrastructure issues to be encompassed by the programme and requires a commitment to the provision of associated infrastructure before development is permitted. The object is to ensure that development does not proceed without the necessary supporting infrastructure.

10.3.3. There will be no possibility that developments will be required to contribute twice towards the same infrastructure matters as are dealt with in Policy P9/8 of the Structure Plan. This is because the Council will have to have regard to the advice in Circular 5/2005 in determining the level of contributions. The Circular recognises the use of pooled developers' contributions, which may be required in respect of some of the infrastructure to which this Policy applies. It requires there to be a clear audit trail between the contributions made and the infrastructure provided, but subject to that advice being followed, there is nothing unsound in principle in the pooling of contributions, and indeed it is provided for in Policy P9/8 of the Structure Plan. The supporting text refers to government advice on planning obligations, and the current Planning Obligations Strategy also explains the requirements of government advice. It is not necessary to repeat that advice in this Plan, and doing so would make the Plan out of date if there was any change in government advice.

10.3.4. The use of SPD to expand on or provide further detail on the application of policies relating to planning obligations is supported by advice in both PPS 12 and Circular 5/2005. Its use as proposed by the Council does not conflict with this advice. It is clear from Circular 5/2005 that contributions should reflect the actual impacts of a development. The Circular also advises that, in circumstances where the economic viability of development is called into question as a result of the requirements in local, regional and national planning policies, it is for the local authority to decide whether the development is one that it wishes to encourage, in which case decisions on the level of contributions should be based on negotiation. However, it is not possible to identify in advance in the Plan the circumstances in which this advice might apply, and no modification is necessary to take account of that possibility.

10.3.5. From its very nature, supplementary guidance is not subject to the same independent scrutiny as the development plan, and the weight to be attached to it will depend on whether it has been prepared in accordance with the advice in PPS 12. But there is no requirement for it to be included in the Plan itself. I agree that developers need to have some certainty as to the contributions they will be

required to make, but that certainty will be provided by a combination of development plan policies and SPD, as envisaged in Circular 5/2005. The timetable for preparation of these documents will be set out in the Council's LDS.

10.3.6. It is appropriate that the requirement to contribute towards infrastructure should apply to education-related development, because such development is as likely as other forms of development to place additional demands on infrastructure. It is also appropriate in principle that the Policy should apply to clinical developments if they place any additional demands on infrastructure. The Council has indicated that its detailed guidance will consider whether any exemptions should be granted to various types of development, and this accords with the advice in the Circular.

10.3.7. The types of infrastructure to be supported by developer contributions will depend on the impact those developments are likely to have on infrastructure. Insufficient information is available at this stage as to the impacts of the developments provided for in the Plan on existing health care facilities, and it would therefore be inappropriate to make any reference to this in the Plan.

10.3.8. Although Policy P9/8 of the Structure Plan requires Local Plans to indicate major infrastructure requirements, the Council has chosen not to include those in this Plan. Provided that such projects are identified in the SPD, there is nothing unsound in this approach. The Council has proposed a change to the Policy to incorporate a general reference to community facilities, which are defined in paragraphs 5.23 and 5.24. This would address objections by Addenbrooke's seeking a wider reference to health care provision than stated in the Policy, and I support it. I consider that it would be appropriate in this instance to incorporate a cross reference to those paragraphs in the supplementary text, in order to point the reader in the appropriate direction.

10.3.9. The Council has proposed a further Pre-Inquiry Change to paragraph 10.11 to make reference to the need to take account of any joint sub regional strategy for developer contributions. I support this change, which reflects work being carried out on a sub-regional basis on infrastructure requirements.

10.3.10. The modification sought by Windsor Road Residents to provide that only developments providing infrastructure improvements will be permitted would not be appropriate, as developers can only be required to make infrastructure improvements where those improvements are directly related to the impact of their development. It is not necessary for this Plan to explain the mechanism for securing infrastructure improvements through planning obligations, as this is to be set out in SPD. There is a statutory process for enforcing planning obligations and that does not need to be set out in the Plan.

10.3.11. I deal with the question of prison development in Chapter 2.

10.3.12. The Council's suggested Pre-Inquiry Change also proposes the inclusion of a reference to waste recycling in the list of infrastructure. Although the provision of recycling equipment is the responsibility of the waste authority, it seems to me that there is no difference in principle between that and other types of infrastructure already included which are the responsibility of other authorities. If a development has an impact on existing waste recycling facilities, then as with other infrastructure impacts it is appropriate for that development to be required to mitigate that impact, and this is recognised in Structure Plan Policy P9/8, which specifically refers to waste management.

RECOMMENDATION

10.3.13. I recommend that the RDD be modified as follows:

(a) by the incorporation of SC 10.001, SC 10.002, and SC 10.003.

(b) by the addition at the end of paragraph 10.10 of the following:

"Community facilities" are defined in paragraphs 5.23 and 5.24.

10.4 PARAGRAPH 8.9 (FDD) AND PARAGRAPH 10.6 (RDD)

Objections

Windsor Road Residents

366/44/DEP01/08_09
366/39/DEP02/10_06

Summary of Objections

- The paragraph should specify that, if necessary, developments will be delayed until sufficient funding for excellent infrastructure is available.

Inspector's Reasoning and Conclusions

10.4.1. It is intended that infrastructure will be funded from a variety of sources, to be co-ordinated by the Infrastructure Partnership. It will be the responsibility of the Infrastructure Partnership to manage the provision of necessary infrastructure, and under these circumstances it would not be reasonable to delay development until all the relevant funding is secured.

RECOMMENDATION

10.4.2. I recommend no modification to the RDD.

10.5 PARAGRAPH 8.8 (FDD)

Objections

The House Builders Federation
Laing Homes Ltd
Wrenbridge Land Ltd
Taylor Woodrow Developments Limited

362/17/DEP01/08_08
708/39/DEP01/08_08
709/39/DEP01/08_08
710/39/DEP01/08_08

Summary of Objections

- There are typographical errors in the paragraph.
- Actual contributions should be the subject of negotiations.

Inspector's Reasoning and Conclusions

10.5.1. The typographical errors in paragraph 8.8 have been corrected in the RDD.

10.5.2. I deal with negotiation on contributions in Section 10.3 above.

RECOMMENDATION

10.5.3. I recommend no modification to the RDD.

10.6 PARAGRAPH 8.10 (FDD)

Objections

The Marshall Group of Companies	66/16/DEP01/08_10
Trumpington Environmental Action Group (TEAG)	460/23/DEP01/08_10
Laing Homes Ltd	708/50/DEP01/08_10
Wrenbridge Land Ltd	709/50/DEP01/08_10
Taylor Woodrow Developments Limited	710/50/DEP01/08_10

Summary of Objections

- It is inappropriate to require development sites to resolve existing deficiencies.
- The paragraph should reflect the latest guidance on planning obligations.
- Actual contributions should be the subject of negotiations.

Inspector's Reasoning and Conclusions

10.6.1. The Plan does not require new developments to address existing infrastructure deficiencies.

10.6.2. Paragraph 10.8 of the RDD, which replaces paragraph 8.10 of the FDD, has to an extent been overtaken by events, as Circular 1/97 has now been replaced by Circular 5/2005. Further changes to the planning obligations system might occur. The paragraph should be amended to take account of the current position and the need for the Council's planning obligations strategy to reflect any changes after the Plan has been adopted.

10.6.3. I deal with negotiation on contributions in Section 10.3 above.

RECOMMENDATION

10.6.4. I recommend that the RDD be modified as follows:

In paragraph 10.8 delete everything after the first sentence and replace with:

Circular 5/2005 is the current key source of guidance on the use of planning obligations. The City Council's Planning Obligations Strategy will need to be updated to reflect this and any further changes to government policy and planning legislation.

10.7 PARAGRAPH 8.11 (FDD)

Objections

Tesco Stores Ltd	372/5/DEP01/08_11
Laing Homes Ltd	708/51/DEP01/08_11
Wrenbridge Land Ltd	709/51/DEP01/08_11
Taylor Woodrow Developments Limited	710/51/DEP01/08_11

Summary of Objections

- If there are policies on planning obligations in the SPG, they should be included within the Local Plan.
- Actual contributions should be the subject of negotiations.

Inspector's Reasoning and Conclusions

10.7.1. I deal with the issues raised in these objections in Section 10.3 above.

RECOMMENDATION**10.7.2. I recommend no modification to the RDD.****10.8 PARAGRAPH 8.12 (FDD)****Objections**

The House Builders Federation	362/18/DEP01/08_12
South Cambridgeshire District Council	461/3/DEP01/08_12
Laing Homes Ltd	708/52/DEP01/08_12
Wrenbridge Land Ltd	709/52/DEP01/08_12
Taylor Woodrow Developments Limited	710/52/DEP01/08_12

Summary of Objections

- There are words missing from the end of the paragraph.
- Actual contributions should be the subject of negotiations.

Inspector's Reasoning and Conclusions

10.8.1. This paragraph, numbered 10.10 in the RDD, is now complete.

10.8.2. I deal with negotiation on contributions in Section 10.3 above.

RECOMMENDATION**10.8.3. I recommend no modification to the RDD.****10.9 PARAGRAPH 8.13 (FDD)****Objections**

The House Builders Federation	362/19/DEP01/08_13
Laing Homes Ltd	708/53/DEP01/08_13
Wrenbridge Land Ltd	709/53/DEP01/08_13
Taylor Woodrow Developments Limited	710/53/DEP01/08_13

Summary of Objections

- Objection is made to the Council's intention to undertake regular reviews of the Planning Obligations Strategy and area transport plans, as the Plan should give certainty to developers in relation to individual site requirements, especially in the case of larger allocations.
- Actual contributions should be the subject of negotiations.

Inspector's Reasoning and Conclusions

10.9.1. The Council's intention is to prepare further guidance for the Areas of Major Change, which will identify infrastructure requirements and thus provide certainty to developers. The Council is aware of the need for this guidance to be prepared promptly so that development is not delayed unnecessarily. But it is unnecessary to make any change to the RDD to reflect the position.

10.9.2. I deal with negotiation on contributions in Section 10.3 above.

RECOMMENDATION**10.9.3. I recommend no modification to the RDD.**

10.10 POLICY 8/3 (FDD) AND POLICY 10/2 (RDD)**Objections**

Cambridgeshire County Council
 Countryside Properties
 The House Builders Federation
 Windsor Road Residents

55/19/DEP01/08_P03
 68/26/DEP01/08_P03
 362/20/DEP01/08_P03
 366/45/DEP01/08_P03
 366/40/DEP02/10_P02
 396/54/DEP01/08_P03
 461/48/DEP02/10_P02
 768/12/DEP02/10_P02

Bidwells Property Consultants
 South Cambridgeshire District Council
 Anne Campbell

Summary of Objections

- The Plan should be more specific about matters needing monitoring. In particular, prompt action will be necessary if any housing shortfall occurs.
- The Plan is seriously deficient and out of conformity with the RPG and emerging Structure Plan in not identifying delivery rates.
- In the event of a shortfall it will still be essential to ensure compliance with the safeguards in the Plan. Methods of guaranteeing and monitoring this and penalties for non-compliance should be stated.
- Monitoring and review needs to take account of development in both the City and South Cambridgeshire.
- There should be a further review of the Green Belt to identify non-strategic sites that could be released as safeguarded land to be used if allocations do not come forward.

Inspector's Reasoning and Conclusions

10.10.1. Policy 8/3 of the FDD has been deleted and replaced with Policy 10/2 of the RDD. This requires compliance with policies and development allocations in the Plan to be continuously monitored throughout the Plan period.

10.10.2. The Council intends to develop a robust planning framework for the urban extensions, and if this is carried out in good time there is no reason why it should hold up development in these areas. There remains the risk that any delay in preparation of this planning guidance may result in development not coming forward at the required rate. If this happens, the Council will need to be proactive in using all the powers available to it to bring forward alternative sites. Policy 10/2 and paragraph 10.15 make it clear what the Council is required to do. No further modification to the Plan is necessary in this regard. If action to bring forward alternative sites is necessary, there is nothing in the Plan to suggest that these developments should not be required to meet the infrastructure obligations set out in the Plan.

10.10.3. The absence from the Plan of delivery rates for housing does not lead the Plan to be seriously out of conformity with the Structure Plan.

10.10.4. The Council has acknowledged that the housing distribution figures in Policy P9/1 of the Structure Plan for Cambridge City and South Cambridgeshire are bracketed together, and the exact distribution of dwellings on developments which bridge the two local authorities will be decided through the master planning of each site. South Cambridgeshire District Council has objected that this should be recognised in the Plan. However, there is nothing inconsistent between Policy 10/2 of the RDD and the Structure Plan requirements, and nothing in that Policy that would prevent joint monitoring and a co-ordinated approach between the two authorities. No change to the Plan is necessary in this regard.

10.10.5. Footnote 3 of Table 5.1 indicates that the land to be released from the Green Belt includes a significant reserve of land for the post 2016 period. In the light of this there is no need to identify further sites to be released from the Green Belt in case any of the sites identified in the Plan do not come forward.

RECOMMENDATION

10.10.6. I recommend no modification to the RDD.

10.11 PARAGRAPH 8.17 (FDD) AND PARAGRAPH 10.15 (RDD)

Objections

The House Builders Federation
Windsor Road Residents

362/41/DEP01/08_17
366/67/DEP01/08_17
366/71/DEP02/10_15

Summary of Objections

- Prompt action will be necessary if any housing shortfall occurs.
- In the event of a shortfall it will still be essential to ensure compliance with the safeguards in the Plan. Methods of guaranteeing and monitoring this and penalties for non-compliance should be stated.

Inspector's Reasoning and Conclusions

10.11.1. I deal with these objections in Section 10.10.

RECOMMENDATION

10.11.2. I recommend no modification to the RDD.

11. APPENDICES

11.1 ALL OF APPENDIX A

Objections

The Bell Educational Trust
The House Builders Federation

83/18/DEP02/OS
362/13/DEP02/OS

Pre-Inquiry Changes: CCC307 & SCOSRS.001

Summary of Objections

- Any contributions sought towards providing open space should be dependent on the identification of a local deficiency, which new development would worsen. Standards should not be described as requirements.
- Allotment provision should be part of an overall open space strategy for the whole City, and not limited to urban extensions. Alternatively the Bell School site should not have to make provision.

Inspector's Reasoning and Conclusions

11.1.1. There is no surplus open space in the City. As a result every housing development is likely to increase the need for open space and should provide open space, or help to improve existing open space, to meet the increase. Hence it is not inappropriate to use the word "requirement" in relation to meeting standards of open space provision for new development.

11.1.2. Section 4 of the Appendix explains the circumstances in which some kinds of provision will not be required for certain types of housing. The inclusion of the word "normally" in the first footnote to Table 2 implies that there might be circumstances where provision for children and teenagers would be required in one bedroom developments, and the Council does not respond to the objection to this. It seems to me that such provision would not be required, and in any case other material considerations would have to be taken into account. "Normally" should be deleted. There is also an error in setting out the standards, which proposed change CCC307 puts right. In addition proposed change SCOSRS.001 should also be made, in accordance with my conclusions in section 3.32.

11.1.3. In contrast to the position in relation to open space generally, there is sufficient allotment space to meet some increase in usage. However this would not meet the needs of the urban extensions, within which there should be new provision as part of new housing development. Hence the difference in the treatment of urban extensions and the rest of the City, in the standards. The Bell School site should not be made an exception, as it is situated in an urban extension.

RECOMMENDATION

11.1.4. I recommend that the RDD be modified by the incorporation of CCC307 and SCOSRS.001, and by the deletion of "normally" in the first footnote to Table 2 in Appendix A.

11.2 ALL OF APPENDIX B

Objections

Land Securities Group Plc

37/2/DEP02/04_P02

Summary of Objections

- The criteria to assess open space for protection under Policy 4/2 are inappropriate.

Inspector's Reasoning and Conclusions

11.2.1. The criteria are not attempting a landscape assessment, but rightly deal with setting, character, environmental quality and the structure of the City, and with features which contribute to environmental importance. The recreational criteria do not solely cover sites of City-wide importance: it is perfectly possible for a site to make a major contribution to the recreational resources of a local area.

11.2.2. The objection to the wildlife/biodiversity criterion (2c) does not specify that any change is sought. Criterion 2c is worded differently from the other criteria. They require a site's contributions (to environmental importance) to be major contributions, whereas the wildlife test is merely that the site make a contribution to wildlife value etc.

11.2.3. On the face of it this test is too easily satisfied. However it is clear from the questions that are asked by the surveyor/decision maker when assessing the contribution a site makes that the contribution has to be important. In principle it is right that designated sites should be identified under a wildlife criterion. Designation criteria are not part of the Local Plan (see Chapter 4 of this report).

11.2.4. The wording of the wildlife part of the Appendix is not too lax, and no change is needed.

RECOMMENDATION

11.2.5. I recommend no modification to the RDD.

11.3 ALL OF APPENDIX C (CPS)**Objections**

New Hall	42/6/DEP01/CPS
Turnstone Estates	47/29/DEP01/CPS
Camstead Homes	74/15/DEP01/CPS
The Bursars' Committee of the Cambridge Colleges	87/34/DEP01/CPS
Downing College	305/3/DEP01/CPS
Windsor Road Residents	366/46/DEP01/CPS
James Development Co. Ltd	378/14/DEP01/CPS
Dernford (Regent) Ltd	391/24/DEP01/CPS
Dr. P. G. I. Stovin	287/5/DEP02/CPS

Inspector's Reasoning and Conclusions**Summary of Objections**

- There should be a separate parking standard for Colleges within the University of Cambridge, and a realistic level of employee parking on College and other student residential sites.

- The parking standards for the controlled parking zone (CPZ) do not reflect the advice in PPG 13.
- The policy should support car free and minimal parking provision on sites with good access to public transport, services and facilities by means other than the car, or where the need for high-density development limits the potential for parking.
- The Colleges used for conferences and summer schools during vacations have a greater need for car parking.
- The parking standards are unrealistic without sufficient cheap frequent public transport being available at all times. Without this the parking provision should be greatly increased.
- The proposed standard of one space per house plus visitor parking should be a minimum.

Inspector's Reasoning and Conclusions

11.3.1. I am not satisfied that these standards reflect the requirement in Policy P8/5 of the Structure Plan that parking standards should be expressed as maximum standards. I say more about that in relation to paragraphs 1.5 and 1.6 of Appendix C, but a change is also necessary to paragraph 1.1 to make it clear that the standards are maxima.

11.3.2. There is a significant level of access to public transport, cycling and walking within that part of the City included in the CPZ. Improvements to public transport and traffic management measures are also planned. Under these circumstances, the Council's approach in limiting the amount of parking further within the CPZ is sound, and is in line with Policy P8/5 and with the advice in PPG 13, which provides for a greater restriction on car parking in areas with good transport accessibility. PPG 13 also recognises that local authorities may adopt more rigorous standards than those set out in that advice, and in my view the circumstances pertaining in Cambridge justify that approach in the Plan.

11.3.3. There is no convincing evidence at present that the CPZ will discourage further sustainable development in the central area. However, this is a matter that the Council will need to monitor carefully. There are many attractive residential areas within the CPZ, and no evidence that the restriction on the provision of car parking in new developments in these areas is lessening the attraction of those areas for house purchasers. Households with more than one car will have the choice of living outside the CPZ, where a higher standard will apply.

11.3.4. The Council has also set out in the RDD the circumstances in which a higher level of car parking might be justified. However, there is no justification for permitting unlimited car parking, even at sites such as Addenbrooke's, given the advice in PPG3 that restricting car parking has a major influence on the means of transport chosen for journeys.

11.3.5. The extent of the CPZ is no longer shown on the Proposals Map, as its extent is governed by traffic regulation orders and so could change during the lifetime of the Plan.

11.3.6. The Council states that, in the case of College development including both a residential and non-residential component, the student residential standards in Table 2 would apply to the residential component and a non-residential component would be considered for additional parking depending on the standards for their respective uses (for example Table 5 or Table 6). However, as Table 6 is headed "Non-Residential Institutions" and the relevant use in that table is

described as "Non-residential higher and further education", Appendix C is far from clear in this respect. I therefore recommend a modification along the lines suggested by the Bursars' Committee of the Cambridge Colleges, although without the reference to shift working staff, as I consider that this is clearly dealt with in paragraph 1.7 of Appendix C.

11.3.7. The standard in the RDD for student residential accommodation where there is no proctorial control or where the accommodation will also house conference delegates is one per five bed spaces within the CPZ. Bearing in mind the high level of accessibility to public transport and other non car-borne modes of transport within the CPZ, I am not satisfied that a case has been made for more car parking to be permitted in this instance. The Council's approach of discouraging students from keeping cars is, in my view, sound in this congested area. The relaxation of the standard for conference use which was introduced into the RDD in response to one objection to Appendix C, is a concession that strikes a reasonable balance between competing needs, but outside conference times there is no reason why any more car parking should be available on such sites than would be permitted if no conference facilities were provided, because of the low level of need for cars amongst students. It is therefore appropriate to restrict the use of this car parking, and I see no reason why such a restriction should not be enforceable using reasonable means.

11.3.8. The standard in Table 2 for student residential accommodation where proctorial or alternative control exists is one space per 10 bed spaces or a pickup/drop-off area. The Council acknowledges that despite this wording a pickup and drop-off area could be included without regard to the standards, if appropriate to the particular proposed development. Table 2 is unclear in this respect, and I agree with the Bursars' Committee that clarification would be appropriate. I therefore recommend a modification to reflect the Council's intention as described in its evidence.

11.3.9. Some objections have suggested that the parking needs of the Colleges of Cambridge University are so distinct that they require a separate parking standard. The issues arising from the objections relating to College accommodation do suggest to me that there might be some benefit in adopting this course, bearing in mind the particular nature of University Colleges. However, no alternative wording has been suggested and I do not therefore recommend any modification to the Plan at this stage, although the Council may wish to consider the matter further when the parking standards are next reviewed.

RECOMMENDATION

11.3.10. I recommend that the RDD be modified as follows:

a) In Paragraph 1.1 of Appendix C delete "appropriate" and replace with "maximum".

b) In Appendix C insert the following after paragraph 2.3:

It is recognised that there is a functional difference between a development which is entirely or largely for student residential accommodation, and the non-residential elements of Colleges where there may be a variety of other uses including administrative and teaching activities. In these circumstances it may be appropriate to make additional car parking provision commensurate with the relevant standards for such uses as "offices" and "higher and further education".

c) in Table 2 of Appendix C in the row relating to student residential accommodation where proctorial control or alternative control on car

parking exist, delete both instances of "or an area for both pickup/drop-off at the end of term time and visitor parking" and in both cases replace with "a pickup and drop-off area could also be included if appropriate to the particular proposed development".

11.4 CPS PARAGRAPH 1.2

Objections

St. Faith's School

107/2/DEP01/CPS1_2

Summary of Objections

- The parking standard for schools should take into account the need for staff to work late.

Inspector's Reasoning and Conclusions

11.4.1. The RDD has increased the standard for non-residential schools, and also acknowledges the need for additional parking in certain circumstances, for example where there is shift working and non car travel options are not viable.

RECOMMENDATION

11.4.2. I recommend no modification to the RDD.

11.5 CPS PARAGRAPH 1.4

Objections

Cambridgeshire County Council

55/71/DEP02/CPS1_4

Summary of Objections

- The paragraph should refer to users of new development. If no on-site car parking can be provided on a site that is not a reason by itself to refuse planning permission. There should be a clear policy position on car free housing.

Inspector's Reasoning and Conclusions

11.5.1. This paragraph clearly relates to the users of new development, without any change to the wording. It is implicit in the standard that under certain circumstances car free housing might be permitted. No further changes are necessary in this regard.

RECOMMENDATION

11.5.2. I recommend no modification to the RDD.

11.6 CPS PARAGRAPH 1.5

Objections

Summary of Objections

- All parking standards should be maxima.

Inspector's Reasoning and Conclusions

11.6.1. Paragraph 1.1 of the RDD notes that the standards set out in the document should not be exceeded. I have recommended above a modification making it clear that the standards are a maximum. However, the statement within paragraph 1.5 of the RDD that the stated levels of car parking within the CPZ are a maximum implies that levels outside the CPZ are not a maximum, contrary to PPG 13 advice. Furthermore, the second sentence conflicts with the advice in PPG that there should be no minimum standards other than parking for disabled people, and that local authorities should not require developers to provide more spaces than they themselves wish, other than in exceptional circumstances. There is no convincing evidence to warrant not following PPG 13 in this case, and the paragraph should therefore be deleted from the RDD.

RECOMMENDATION

11.6.2. I recommend that the RDD be modified by the deletion of paragraph 1.5 of Appendix C.

11.7 CPS PARAGRAPH 1.6

Objections

Summary of Objections

- This provision appears to be contrary to the principle in PPG 13 that there should be no minimum standards for development other than parking for disabled people. It is not thought possible that car free development can be achieved outside the CPZ because there is no mechanism in place to discourage the use of the private car by removal of parking permit, and without on-site parking cars will simply park on the street.

Inspector's Reasoning and Conclusions

11.7.1. This paragraph is also in conflict with the advice in PPG 13, as it implies a minimum level of parking unless certain unexceptional conditions are met, and ignores the advice in PPG 13 that developers should not be required to provide more spaces than they wish, other than in exceptional circumstances. PPG 13's advice is that on-street parking controls should be introduced to minimise the potential displacement of parking where on-site parking is being limited. The displacement of parking onto the street is not a reason for applying a minimum parking standard, other than in the exceptional circumstances envisaged in paragraph 51 of PPG 13.

RECOMMENDATION

11.7.2. I recommend that the RDD be modified by the deletion of paragraph 1.6 of Appendix C.

11.8 CPS PARAGRAPH 1.7**Objections**

Cambridgeshire County Council

55/74/4/DEP02/CPS1_7

Summary of Objections

- Paragraph 1.7 should be removed as it is unnecessary and would cause problems for officers trying to apply the standards.

Inspector's Reasoning and Conclusions

11.8.1. It is always possible that there will be exceptional circumstances where there might be a justification for exceeding the maximum parking standards, and PPG 13 does not advise against this. It is not clear why this paragraph should cause difficulties in application of the standards, and as it provides some guidance as to the circumstances where standards might be justifiably exceeded, I do not recommend any changes to it.

RECOMMENDATION

11.8.2. I recommend no modification to the RDD.

11.9 CPS PARAGRAPH 1.8**Objections**

Cambridgeshire County Council

55/75/DEP02/CPS1_8

Summary of Objections

- Paragraph 1.8 should be removed as it is unnecessary and would cause problems for officers trying to apply the standards.

Inspector's Reasoning and Conclusions

11.9.1. It does not appear unreasonable to identify the situation described in paragraph 1.8 as one where parking in excess of the maximum standard might be considered. It is not clear why this paragraph would cause problems in the application of the standards. I do not recommend any changes to it

RECOMMENDATION

11.9.2. I recommend no modification to the RDD.

11.10 CPS TABLE 1**Objections**

Paul Farmer
The House Builders Federation

261/1/DEP01/CPST1
362/25/DEP01/CPST1

Summary of Objections

- Concern is expressed as to the number of car parking spaces to be allowed per dwelling in the Station Road development.

- The standards are not realistic or achievable in respect of all sites, as they fail to take account of the fact that residents will still wish to use cars, even if they have access to a range of alternative transport modes.

Inspector's Reasoning and Conclusions

11.10.1. Car parking standards are not intended to be a reflection of current car ownership. The Council is aiming at changing transport patterns by encouraging a shift away from use of the private car towards more sustainable means of travel, and this aim accords with PPG 13. The different standard as between sites within and outside the CPZ also reflects the availability of public transport across the City. There is no evidence that the standards proposed are unrealistic or unachievable, or that inadequate car parking provision would deter developers and house buyers. Demand for on-street parking can be addressed by the imposition of parking restrictions.

RECOMMENDATION

11.10.2. I recommend no modification to the RDD.

11.11 CPS TABLE 2

Objections

The Bursars' Committee of the Cambridge Colleges

Peter Luard

The Bursars' Committee of the Cambridge Colleges

87/31/DEP01/CPST2

87/33/DEP01/CPST2

724/4/DEP01/CPST2

87/7/DEP02/CPST2

Summary of Objections

- The standard for student residential accommodation where proctorial or alternative control exists should be one space for every 10 bed spaces together with an area for pick-up/drop-off and visitor parking.
- On sites where there is no proctorial control, there should be no differentiation between sites within and outside the SPZ.
- The parking standards for residential schools should be increased.
- In the case of student residential accommodation where proctorial control does not exist or where it does exist but the development will house conference delegates, the requirement for controls to limit the use of car parking outside conference times should be removed.

Inspector's Reasoning and Conclusions

11.11.1. The parking standards for residential schools in the RDD have been increased above those shown in the FDD. There is no convincing evidence that there is any need for a greater level of parking for residential schools than shown in Table 2 as now drafted.

11.11.2. I deal with the remainder of these objections above.

RECOMMENDATION

11.11.3. I recommend no modification to the RDD.

11.12 CPS TABLE 3**Objections**

Marks and Spencer Plc
 Tesco Stores Ltd
 WM Morrison Supermarkets Plc

367/7/DEP01/CPST3
 372/1/DEP01/CPST3
 406/5/DEP01/CPST3

Pre-Inquiry Changes: CCC308**Summary of Objections**

- The standards for retail developments should not be more restrictive than the national standards set out in PPG 13.

Inspector's Reasoning and Conclusions

11.12.1. Annex D of PPG 13 contains maximum parking standards for a range of major developments, including retail. It advises that the level set out in Annex D should be applied as a maximum, but local planning authorities may adopt more rigorous standards where appropriate. The standards for food retail developments in Table 3 of Appendix C to the RDD are somewhat higher than those in the FDD, but they are below the standards in PPG 13.

11.12.2. In my view Cambridge does have characteristics that set it apart from a number of other areas in the country, including its compact and densely developed urban area, the constraints around the City, the high proportion of single person households, the lower than average car ownership, the high levels of traffic congestion, the good public transport accessibility, and higher levels of cycling. It is also important, given the shortage of available land within Cambridge to meet a number of development pressures, to exercise restraint over the amount of space taken up by car parking. In these circumstances, I am satisfied that the Council is justified in adopting a lower parking standard for retail development.

11.12.3. The Council has acknowledged the potential problems that its approach may lead to, but it is by no means clear that restricting parking at food stores would be ineffective in influencing travel by car, particularly given the other policies relating to public transport accessibility that will apply in the new urban extensions. Nor is it clear that new food store provision can help to reduce car journeys overall. If difficulties such as on-street parking were to occur as a result of the Council's approach, these could be addressed by the imposition and enforcement of parking controls.

11.12.4. The Council has proposed a Pre-Inquiry Change, CCC308, which I support, to correct a minor typographical error in Table 3. Otherwise, I recommend no change to the Plan in this regard.

RECOMMENDATION

11.12.5. I recommend that the RDD be modified by the incorporation of Pre-Inquiry Change CCC308.

11.13 CPS TABLE 5**Objections**

Network Rail

370/19/DEP01/CPST5

Summary of Objections

- Parking for offices within the CPZ should be one space per 60 square metres.

Inspector's Reasoning and Conclusions

11.13.1. The level of car parking permitted for business and industrial uses within the CPZ is now higher in the RDD than originally proposed in the FDD. However, it has not been increased to the one space per 60 square metres suggested in this objection. The CPZ is an area of very high public transport accessibility, where it is appropriate to restrict car parking provision, particularly given the particular characteristics of Cambridge. The standards proposed in Table 5 appear to be sound, and I recommend no change.

RECOMMENDATION

11.13.2. I recommend no modification to the RDD.

11.14 CPS TABLE 6**Objections**

Peter Luard

724/3/DEP01/CPST6

Summary of Objections

- The parking standards for non-residential schools should be increased.

Inspector's Reasoning and Conclusions

11.14.1. The parking standards for non-residential schools in the RDD have been increased above those shown in the FDD. There is no convincing evidence that there is any need for a greater level of parking for non-residential schools than shown in Table 6 as now drafted.

RECOMMENDATION

11.14.2. I recommend no modification to the RDD.

11.15 ALL OF APPENDIX D (BPS)**Objections**

New Hall

42/7/DEP01/BPS

Downing College

305/2/DEP01/BPS

The House Builders Federation

362/26/DEP01/BPS

Land Securities Group Plc

37/17/DEP02/BPS

Cambridge Cycling Campaign

437/1/DEP02/BPS

Jonathan Larmour

776/14/DEP02/BPS

James Woodburn

819/1/DEP02/BPS

Summary of Objections

- There should be a separate cycle parking standard for colleges within the University of Cambridge. The standards do not reflect student cycle ownership, which is much lower in practice.

- The standards for dwellings are too onerous.
- The standards should be mandatory with only limited flexibility and enforcement made easier.
- The standards are inadequate, especially for students.
- Cycle racks should be as close as possible to main entrances. High capacity stands should not be encouraged.

Inspector's Reasoning and Conclusions

11.15.1. The plan has a separate standard for student accommodation, and distinguishes between locations within the historic core and elsewhere in the City. It is not clear to me that there would be any benefit from making any further distinction between Cambridge University Colleges and other student accommodation. I deal with the question of numbers and type of provision for student accommodation below in section 11.17.

11.15.2. The level of cycle theft in Cambridge is high, and in view of the importance of cycling as a means of transport in this area it is necessary to require some form of cycle storage in new developments. In the RDD the cycle parking standards now require a covered lockable enclosure, which for individual houses could be in the form of a shed or garage. This will allow cycle parking to be provided without unnecessary use of land. Whilst some objectors have argued that the standards are too high, others have objected that they are too low, and there is certainly a great deal of unofficial parking of bicycles around the City which points to the shortage of official parking. On balance, I consider that overall the standards represent a reasonable requirement.

11.15.3. The Plan can only go so far in setting out the standard to be required of developers. It is then up to the City Council to ensure that those standards are adhered to. However, there may always be exceptional circumstances where the Council determines that the need to provide cycle parking is outweighed by other relevant considerations, and the Plan would be too inflexible if it did not allow those circumstances to be taken into account.

11.15.4. Changes incorporated into the RDD address some of the objections concerning accessibility and security of cycle parking. In addition, Pre-Inquiry change SC BPS.001 (see section 11.16 below) adds a requirement that residential cycle parking should be easily accessible and convenient to use, and clarifies the requirement for covered parking for cycle parking for employees. The change would also clarify the bullet point relating to flexibility. I support these changes as they add clarity to the Plan.

11.15.5. Objection is made to the inclusion on page 155 of the Plan of a diagram of high-capacity racks. The Council makes it clear that such racks would only be acceptable in certain circumstances, but the inclusion of the diagram is helpful and I do not find the objections to this type of rack convincing enough to warrant omitting the diagram from the Plan.

11.15.6. There is a typographical error in Table 4, and I recommend a modification to address that.

RECOMMENDATION

11.15.7. I recommend that the RDD be modified as follows:

In table 4 of appendix D - a) in row 3 column 1 after "non-residential higher and" add "further education" and b) in row 3 column 2 delete "further education".

11.16 BPS PARAGRAPH 1.2**Objections**

The Bursars' Committee of the Cambridge Colleges
The Bursars' Committee of the Cambridge Colleges

87/29/DEP01/BPS1_2
87/6/DEP02/BPS1_2

Pre-Inquiry Changes: SCBPS.001**Summary of Objections**

- There should not be a requirement for cycle parking to be near main entrances.
- The requirements of the first two bullet points are unreasonable.

Inspector's Reasoning and Conclusions

11.16.1. In the RDD, the requirement that cycle parking should be located near the main entrance to buildings has been deleted except in the case of short stay cycle parking. Pre-Inquiry change SC BPS.001 adds a requirement that residential cycle parking should be easily accessible and convenient to use, and employee cycle parking should, where practical, be covered.

11.16.2. Not all types of cycle rack are as secure as others, and I consider that the Council's approach in specifying the type of rack that would be acceptable is sound and reasonable. Paragraph 1.2 does not contain an absolute requirement for individual lockers for student accommodation, but permits cycle stands within a lockable covered enclosure. This appears to me to be a reasonable requirement, given the need for long-term cycle parking to offer a degree of protection. It should not take up an undue amount of space.

RECOMMENDATION

11.16.3. I recommend that the RDD be modified by the incorporation of Pre-Inquiry Change SC BPS.001.

11.17 BPS TABLE 1**Objections**

The Bursars' Committee of the Cambridge Colleges
Christ's College
The Bursars' Committee of the Cambridge Colleges

87/28/DEP01/BPST1
364/10/DEP01/BPST1
87/5/DEP02/BPST1

Summary of Objections

- The standard for student residential accommodation does not reflect actual bicycle ownership.
- The standard for students should be flexible in accordance with the location of the accommodation.

Inspector's Reasoning and Conclusions

11.17.1. There is an absence of evidence about actual student bicycle ownership on which to base a standard, and although the objection from Christ's College refers to a survey indicating that a ratio of 1:3 bicycle spaces to bedspaces would be sufficient in the case of that centrally-located College, the actual survey has not been provided. Whilst these objections seek a reduction in the standard, others

have argued that the standard is not high enough. The expansion of the University to the west and north west is likely to increase the need for students to travel further than a comfortable walking distance, making bicycle travel even more attractive than at present, particularly as car ownership amongst students is not encouraged. For this reason, the standard set out in the RDD, which is lower than the requirement in the adopted Plan, does not appear to me to be unreasonable in principle. The standard makes a distinction between sites located within the historic core and those outside, but given the disparate locations of University buildings it would be difficult to make the standard any more dependent on location, and I do not support any further change in this respect.

11.17.2. The requirement for cycle racks to meet the specification on page 155 of the Plan is also reasonable as it would ensure that adequate security and support for the bicycle was provided, which is an important consideration in view of the high level of cycle theft in the area.

RECOMMENDATION

11.17.3. I recommend no modification to the RDD.

11.18 ALL OF APPENDIX E

Objections

The Chancellor, Masters and Scholars of the
University of Cambridge
The Wildlife Trust
RLW Estates

33/39/DEP01/DS
382/20/DEP01/DS
774/2/DEP02/DS

Further Proposed Change: FPC30

Summary of Objections

- There is a series of errors and omissions with regard to wildlife sites.
- Land east of Cambridge Station should not be designated as a Protected Industrial Site.

Inspector's Reasoning and Conclusions

11.18.1. The RDD now contains new lists of wildlife sites in response to 2 of the objections. There remains an anomaly between the Appendix and the Plan text, which the Council wishes to see amended by means of FPC30. This would correct the number of County Wildlife Sites given in paragraph 4.24, and should be incorporated in the Plan.

11.18.2. The University draws attention to the West Cambridge Master Plan review and its apparent changes to the boundary of the City Wildlife Site east of the M11. However the Council's approval of the review says that the proposals do not impinge on the wildlife sites. The Council indicates that their approval of the review does not mean the Council has approved any wildlife site boundary revision. In my view there is insufficient basis for the Plan to suggest that the boundary has been revised.

11.18.3. In Chapter 7 I deal with the principle of designation of Protected Industrial Sites. The Clifton Court/Clifton Road site scored reasonably well in the Industrial Land Review commissioned by the Council and was one of the top 10

sites. It is also one of the larger sites in the Plan area. I have concluded in Chapter 9 of this report that part of the site occupied by Pickfords and the Royal Mail should not be included within the Station Area of Major Change. Given its identified advantages as an industrial site, I also conclude that this part of the site should remain in the list of Protected Industrial Sites rather than be given only the lesser protection of the second part of the Policy.

RECOMMENDATION

11.18.4. I recommend that the RDD be modified by the incorporation of FPC30.

11.19 ALL OF APPENDIX F (PS)

Objections

Taylor Woodrow Developments Limited	2/9/DEP01/PS
Addenbrooke's NHS Trust	399/16/DEP01/PS
Glisson Road/Tenison Road Area Residents Assoc.	688/4/DEP01/PS
Taylor Woodrow Developments Limited	2/4/DEP02/PS
Cllr John Durrant	838/12/DEP02/PS

Summary of Objections

- East Cambridge should not feature in the Proposals Schedule. Other sites should be included in the Schedule.
- Housing completions per site should be shown.
- The reference to housing should be deleted in relation to Addenbrooke's.

Inspector's Reasoning and Conclusions

11.19.1. Although the Council is not counting on the Airport land to meet the Structure Plan housing requirement, the proposal for that land should remain in the Schedule because it might come forward before the end of the Plan period. Even it does not, the relevant parties are working to bring it forward, as a major previously developed site, and it is sensible to show it as a proposal.

11.19.2. I deal with the Netherhall and Abbey Stadium sites as housing omission sites (see above) and do not recommend their allocation for housing development. The site at 5-15 Tenison Road is too small to be shown on the Proposals Map. Staff housing is proposed at Addenbrooke's.

11.19.3. Housing capacities are given in Chapter 9 for Areas of Major Change. The Urban Capacity Study gives information for other sites. I do not consider the Plan needs to give more information on this topic, as there are many smaller sites and dwelling estimates for them could change.

RECOMMENDATION

11.19.4. I recommend no modification to the RDD in response to these objections.

11.20 PROPOSALS SITE 4.15 (FDD)

Objections

Cambridge University Press

393/1/DEP01/4_15

Summary of Objections

- The site should be enlarged to include all the land the subject of an outline planning application.

Inspector's Reasoning and Conclusions

11.20.1. The changes sought by the objector have been incorporated into the RDD.

RECOMMENDATION

11.20.2. I recommend no modification to the RDD.

11.21 PROPOSALS SITE 4.11 (FDD)**Objections**

BT Plc

376/2/DEP01/4_11

Summary of Objections

- The text should make it clear that this site can be developed piecemeal.

Inspector's Reasoning and Conclusions

11.21.1. No change is necessary to address this objection, as Policy 3/6 allows the development of part of a site where it can be demonstrated that consideration has been given to development of the remainder of the site.

RECOMMENDATION

11.21.2. I recommend no modification to the RDD.

11.22 PROPOSALS SITE 4.13 (FDD) AND 5.05 (RDD)**Objections**

Homerton College

19/3/DEP01/4_13

Dominie Walters

19/2/DEP02/5_05

506/1/DEP01/4_13

Summary of Objections

- The site should match exactly the area granted planning permission, and the open space associated with the new housing development should be included in the residential allocation. The site area is incorrect.
- The site should not be allocated for housing.

Inspector's Reasoning and Conclusions

11.22.1. The site as shown in the RDD has now been amended. The site area

shown in the Proposals Schedule reflects the Council's own measurement of the site, and there is no convincing evidence that this is incorrect. It is not appropriate to include the open space land within the housing allocation, as it is not intended that it should be developed.

11.22.2. The site has planning permission for development for housing, and construction has commenced. The principle of development on the site has therefore been irrevocably established. There is no longer any need for the site to be shown as an allocation, and it can be deleted from the Plan.

RECOMMENDATION

11.22.3. I recommend that the RDD be modified by the deletion of Site 5.05 from Appendix F and from the Proposals Map.

11.23 PROPOSALS SITE 4.16 (FDD)

Objections

Green Property

337/2/DEP01/4_16

Summary of Objections

- Housing development of this site could harm the objector's investment in the adjacent Westbrook Centre and lead to the loss of the Cambridge City FC ground.

Inspector's Reasoning and Conclusions

11.23.1. A substantial part of the Cambridge City site is occupied by car parking, buildings and other structures. The ground is not available as public open space and is not open to public view. In my opinion it makes only a limited contribution to the City's open space resources. On the other hand open space could be provided as part of the redevelopment for housing, which is dependent in any case on the relocation of the Football Club. There is no evidence that a relocation site has yet been found but the length of the Plan period gives time for this to be done.

11.23.2. Access could potentially be provided via a nearby proposed development site, rather than via the Westbrook Centre, but this is a matter of detail to be assessed later. In my view access provision would not cause harm in terms of any matter of public interest.

RECOMMENDATION

11.23.3. I recommend no modification to the RDD.

11.24 PROPOSALS SITE 4.14 (FDD)

Objections

Ursula Stubbings
Dr. R. & Mrs. D. Cox

143/2/DEP01/4_14
578/2/DEP01/4_14

Summary of Objections

- The land is too near houses, and should be retained as open space.
- The height of new development would have to be controlled.

Inspector's Reasoning and Conclusions

11.24.1. The land is occupied by a large BT building and car parking. It is not an open space, and housing development in a residential area is acceptable in principle. The height of new development would be a matter for detailed design to address.

RECOMMENDATION

11.24.2. I recommend no modification to the RDD.

11.25 PROPOSALS SITE 4.20 (FDD)

Objections

Travis Perkins
Glisson Road/Tenison Road Area Residents Assoc.

387/1/DEP01/4_20
688/3/DEP01/4_20

Summary of Objections

- Clarification is sought that the allocation of the site will not prejudice the existing use of the current occupiers or their ability to expand.
- Concern is expressed as to the impact of development here on the surrounding residential streets, particularly as a result of additional traffic.

Inspector's Reasoning and Conclusions

11.25.1. There is nothing in the plan that would prevent the continued occupation of this site by the existing occupiers. Policy 5/1 in the RDD allows the provision on allocated sites of additional floorspace for established firms for their own occupation and use on their existing site.

11.25.2. Any planning application to develop this site would be subject to a transport assessment, and the Council would be able to require mitigating measures to address any transport impacts.

RECOMMENDATION

11.25.3. I recommend no modification to the RDD.

11.26 PROPOSALS SITE 4.21 (FDD)

Objections

Mr. P. Singh
Mrs. M. K. Singh
Mrs. P. Kaur

314/4/DEP01/4_21
315/2/DEP01/4_21
316/2/DEP01/4_21

Summary of Objections

- The housing development proposed would be out of character with the low density housing in this neighbourhood. A school would be a better use, or the existing hospital use could continue.

Inspector's Reasoning and Conclusions

11.26.1. Redevelopment or conversion would have to take account of the character of the area. Whether the existing use continues is a matter for the owners and operators of the hospital. There are no proposals for a school.

RECOMMENDATION

11.26.2. I recommend no modification to the RDD.

11.27 PROPOSALS SITE 5.12

Objections

Mrs M. A. Wilson

753/2/DEP02/5_12

Summary of Objections

- New houses in this deprived area should be high-priced, high-quality houses and not affordable houses.

Inspector's Reasoning and Conclusions

11.27.1. The Proposals Schedule does not refer to affordable housing, but the site is large enough for a possible element of such housing. However market housing could also be provided. I do not consider that there is a substantial argument for specifying that no affordable housing should be provided, given the need for such housing in Cambridge.

11.27.2. Fen Road serves a substantial number of properties, and I do not support the suggestion that it should be closed to traffic at the railway crossing. It seems to me to be capable of accommodating traffic from a housing development on the Proposals Site. The matters of adoption of the road, and of the travellers' site in South Cambridgeshire District, are not matters for this Plan.

RECOMMENDATION

11.27.3. I recommend no modification to the RDD.

11.28 PROPOSALS SITE 5.13

Objections

Cambridgeshire Fire and Rescue Services

810/6/DEP02/5_13

Summary of Objections

- The plan should refer to the community importance of modern fire station facilities and the significance of the site at Parkside to establish a new fire station.

Inspector's Reasoning and Conclusions

11.28.1. I deal with the issues raised in this objection in Chapter 5.

RECOMMENDATION

11.28.2. **I recommend no modification to the RDD.**

11.29 PROPOSALS SITE 4.23 (FDD) AND 5.14 (RDD)**Objections**

Cambridgeshire County Council
Green Property
Rockley Dene Homes Ltd

55/62/DEP01/4_23
337/4/DEP01/4_23
811/1/DEP02/5_14

Summary of Objections

- The replacement school, which involves loss of protected open space, has not been indicated.
- Access should be provided to Site 5.06.
- Mixed uses should be allowed on this site.

Inspector's Reasoning and Conclusions

11.29.1. Planning permissions are not shown in the Plan, as a general rule. The replacement school was under construction by the end of the inquiry. There is no need to show it on the Proposals Map or in the Proposals Schedule.

11.29.2. I deal with Site 4.16 (now Site 5.06) above. In view of my conclusions regarding the site, I do not accept that there is a need to refer to access through Site 5.14.

11.29.3. The Proposed Use column already refers to housing and community facilities on this land. Any further mix would be considered on its merits, but there is no need to change the RDD wording. It is consistent with the Brief for the area, and reflects the location of the site outside (although near) the local centre. As the school has moved, the reference in the Proposals Schedule to community facilities should not be weakened.

RECOMMENDATION

11.29.4. I recommend no modification to the RDD.

11.30 PROPOSALS SITE 4.30 (FDD)**Objections**

Ursula Stubbings
Mr. P. Singh
Mrs. M. K. Singh
Mrs. P. Kaur

143/4/DEP01/4_30
314/3/DEP01/4_30
315/1/DEP01/4_30
316/3/DEP01/4_30

Summary of Objections

- Housing development here would harm nearby houses. 135 Long Road is a landmark building.

Inspector's Reasoning and Conclusions

11.30.1. Housing development near existing housing is not unacceptable in principle. Harmful impacts from the layout and design of the new development can be prevented by appropriate attention to detail. There is no evidence that the existing building is a Listed Building. My opinion is that the building is not of such value as to warrant deleting this development allocation.

RECOMMENDATION

11.30.2. I recommend no modification to the RDD.

11.31 PROPOSALS SITE 6.01

Objections

Land Securities Group Plc

37/14/DEP02/6_01
37/15/DEP02/6_01
37/16/DEP02/6_01
37/6/DEP04/6_01

Pre-Inquiry Changes: CCC313

Summary of Objections

- This proposal should be reworded to allow for development of one site and the safeguarding of the other 2.

Inspector's Reasoning and Conclusions

11.31.1. This large group of sites is in private ownership. Present use is limited to angling on part of the land. The owners have no intention of developing the land for recreational purposes. The Council has no proposals in any recreational development or similar programme to secure such use, which would be resisted by the owner. It is unrealistic to expect that the proposal for outdoor recreation, as set out in the Proposals Schedule, will be implemented in the Plan period. The Council agreed this during the inquiry. That proposal should therefore be deleted from the Plan.

11.31.2. However none of the land should be allocated for housing or be safeguarded. The Phase II site and the western site are contaminated landfill sites, and the Lakes site is an important open space.

RECOMMENDATION

11.31.3. I recommend that the RDD be modified by the deletion of Site 6.01 from the Proposals Schedule and the Proposals Map.

11.32 PROPOSALS SITE 6.02

Objections

Owen
Land Securities Properties Limited

252/2/DEP01/6_02
371/1/DEP01/6_02
371/2/DEP01/6_02
374/17/DEP01/6_02
396/1/DEP01/6_02

Transport 2000 Cambridgeshire & West Suffolk
Bidwells Property Consultants

Summary of Objections

- The site should be allocated for use as a public transport hub.
- There should be a tunnel between Bradwell's Court and Madingley Road.
- This should be a retail-led mixed use redevelopment, and not employment led.
- The allocation is too large.

Inspector's Reasoning and Conclusions

11.32.1. The Plan has been changed in order that the RDD should meet the third and fourth objections as summarised above. No relevant agency has a proposal to make this site into a bus station extension or similar, or to provide a tunnel. The Plan is not in contravention of the Structure Plan in this respect, as the RDD contains several provisions to increase sustainability. In fact the Council has granted planning permission for the redevelopment of this site. The alternative transport related uses are not sufficiently realistic to affect the allocation of the land as in the RDD.

RECOMMENDATION

11.32.2. I recommend no modification to the RDD.

11.33 PROPOSALS SITE 6.03 (FDD)

Objections

The Marshall Group Of Companies

66/13/DEP01/6_03

Summary of Objections

- This site is shown as protected industrial land, but is suitable for housing.

Inspector's Reasoning and Conclusions

11.33.1. The FDD allocation led to the objection. The RDD version of the Plan has been changed to meet the objection. The new employment buildings should not be redeveloped for housing.

RECOMMENDATION

11.33.2. I recommend no modification to the RDD.

11.34 PROPOSALS SITE 6.01 (FDD)

Objections

Summary of Objections

- The uses proposed for this site should include housing.

Inspector's Reasoning and Conclusions

11.34.1. This site, which is numbered 7.01 in the RDD, now includes housing amongst the proposed uses.

RECOMMENDATION

11.34.2. I recommend no modification to the RDD.

11.35 PROPOSALS SITE 6.04 (FDD)

Objections

Green Property
English Heritage

337/5/DEP01/6_04
338/22/DEP01/6_04

Summary of Objections

- Clarification is sought regarding uses in the northern part of the site.
- Care is needed in relation to the impact of redevelopment on the character and appearance of the area.

Inspector's Reasoning and Conclusions

11.35.1. The northern end of the site is allocated for the whole range of uses referred to in relation to this site. Effects on the Conservation Area and on Jesus Green are matters for consideration at the detailed stage.

RECOMMENDATION

11.35.2. I recommend no modification to the RDD.

11.36 PROPOSALS SITE 6.07 (FDD)

Objections

P. Larmuth

534/3/DEP01/6_07

Summary of Objections

- More beautiful countryside is under threat. Objection is made to more large houses, light pollution and gridlock. This will also destroy the area of Grantchester.

Inspector's Reasoning and Conclusions

11.36.1. This site already has the benefit of an outline planning permission and is to be developed in accordance with an approved Master Plan. It is included as an allocation because development will continue beyond the Plan period, but the

principle of development here has been established.

11.36.2. I deal in Chapter 9 of this report with development at the Southern Fringe.

RECOMMENDATION

11.36.3. I recommend no modification to the RDD.

11.37 PROPOSALS SITE 6.09 (FDD) AND 7.07 (RDD)

Objections to Site 6.09

The Chancellor, Masters and Scholars of the
University of Cambridge
K. A. Arrandale
Corpus Christi
Emmanuel College
Gonville and Caius
R. Brister
North Newnham Residents Association

33/43/DEP01/6_09
328/1/DEP01/6_09
394/2/DEP01/6_09
397/1/DEP01/6_09
398/4/DEP01/6_09
547/2/DEP01/6_09
678/6/DEP01/6_09

Objections to Site 7.07

The objections to this aspect of the plan are listed in Annex 3.

Summary of Objections

- The site should be allocated for open market housing.
- There should be some indication of how the current users of the sites will be relocated.
- The site should be retained as a sports ground and added to the list of protected open spaces identified on the Proposals Map.

Inspector's Reasoning and Conclusions

11.37.1. In Chapter 7 of this report I have recommended that the allocation should be deleted from the Plan because there is no convincing evidence that the site has any value in meeting the needs of the University. Furthermore, there is no need for additional open market housing land that would warrant the allocation of this site for that purpose, or that would outweigh the objections to the development of the site identified in Chapter 7.

RECOMMENDATION

11.37.2. I recommend that the RDD be modified by the deletion of Site 7.07 from Appendix F and from the Proposals Map.

11.38 PROPOSALS SITE 7.08

Objections

The Chancellor, Masters and Scholars of the
University of Cambridge

33/2/DEP02/7_08

Further Proposed Change: FPC 33**Summary of Objections**

- The reference in the policy to faculty development should be deleted.
- The site should be allocated for general-purpose housing.

Inspector's Reasoning and Conclusions

11.38.1. The University has made a case for the release of land from the Green Belt to meet its growth needs. However, it is appropriate that other available sites not in the Green Belt should be developed before the release of former Green Belt sites for development if there is no other objection to their development, bearing in mind the requirement for the University to demonstrate need before these former Green Belt sites are made available. There is no evidence that this site is unavailable for development. No need for development for either College or University-related purposes has arisen over the period the site has been allocated in the adopted Plan, but that does not mean that a need will not arise during this Plan period, particularly given the University's plans for further growth. The plan makes provision elsewhere in the City for open market housing to meet the strategic housing requirement, and there is therefore no justification for allocating the site for general housing. The Council has proposed a further change, FPC 33, which would address the objection by Cambridge University, and I therefore support it.

RECOMMENDATION

11.38.2. I recommend that the RDD be modified by the incorporation of FPC 33.

11.39 PROPOSALS SITE 6.13 (FDD) AND 7.10 (RDD)**Objections**

St John's College
A. R. Farming

81/2/DEP01/6_13
835/1/DEP02/7_10

Summary of Objections

- This site should be recognised as being suitable for residential development as well as for student residential accommodation.
- The site should be allocated for housing.

Inspector's Reasoning and Conclusions

11.39.1. There is likely to be a continuing need for collegiate and affordable key worker housing, and this site is well located for such provision because of its proximity to other faculty development in West Cambridge. The plan makes provision elsewhere in the City for open market housing to meet the strategic housing requirement. Although no need for College housing may have arisen in the past, that is not to say that such a need will not arise in the future, bearing in mind the University's expansion plans. For these reasons it is appropriate for the allocation to remain as described in the RDD.

RECOMMENDATION**11.39.2. I recommend no modification to the RDD.****11.40 PROPOSALS SITE 6.14 (FDD) AND 7.11 (RDD)****Objections**

Trinity College

63/1/DEP01/6_14

K. A. Arrandale
R. Brister63/2/DEP02/7_11
328/2/DEP01/6_14
547/1/DEP01/6_14**Summary of Objections**

- The site should be allocated for housing.
- There is no indication how the tennis club would be relocated, and there should be a replacement site which is as good as that being lost.
- The site should be retained as a sports ground.

Inspector's Reasoning and Conclusions

11.40.1. There is no evidence of any assessment that shows this site to be surplus to requirements as a sports site, or that appropriate replacement facilities will be provided if it is developed. For this reason, the allocation of this site conflicts with advice in PPG17, which postdates the adoption of the current Local Plan which also allocates the site for development. In my view the conflict with PPG17 outweighs any saving in former Green Belt land that might result from this allocation, and therefore the allocation should be removed from the plan.

11.40.2. As the plan has allocated sufficient land to meet the strategic housing requirement, there is no justification for allocating this site for housing purposes that would outweigh the conflict with PPG17.

RECOMMENDATION**11.40.3. I recommend that the RDD be modified by the deletion of Site 7.11 from Appendix F and the Proposals Map.****11.41 PROPOSALS SITE 6.15 (FDD) AND 7.13 (RDD)****Objections**

Nicholas Finer

285/4/DEP01/6_15

Summary of Objections

- Access for vehicles should not be onto Storeys Way, building density should be in keeping with the surroundings and mature trees and woodland should be preserved.

Inspector's Reasoning and Conclusions

11.41.1. These are all matters to be addressed at the detailed development control stage rather than through changes to the Plan. At the time of the inquiry this site was in the course of development, and the allocation can therefore be

deleted from the Plan.

RECOMMENDATION

11.41.2. I recommend that the RDD be modified by the deletion of Site 7.13 from Appendix F and the Proposals Map.

11.42 PROPOSALS SITE 6.16 (FDD) AND 7.14 (RDD)

Objections

Trinity College

63/2/DEP01/6_16
63/1/DEP02/7_14

Summary of Objections

- The site should be allocated for open market housing.

Inspector's Reasoning and Conclusions

11.42.1. Although the objector states that this site is no longer required by the hockey club, there is no evidence of any assessment that shows the site to be surplus to requirements as a sports site, or that appropriate replacement facilities will be provided if it is developed. For this reason, the allocation of this site conflicts with advice in PPG17. In my view the conflict with PPG17 outweighs any saving in former Green Belt land that might result from this allocation, and therefore the allocation should be removed from the Plan.

11.42.2. As the Plan has allocated sufficient land to meet the strategic housing requirement, there is no justification for allocating this site for housing purposes that would outweigh the conflict with PPG17. However, if the site could be shown to be surplus to requirements, in principle it could come forward as a windfall site.

RECOMMENDATION

11.42.3. I recommend that the RDD be modified by the deletion of Site 7.14 from Appendix F and the Proposals Map.

11.43 PROPOSALS SITE 7.15

Objections

Cambridge Regional College

698/2/DEP02/7_15

Summary of Objections

- The description of the proposed use should be modified to provide flexibility.

Inspector's Reasoning and Conclusions

11.43.1. The objector seeks a change in the wording of the proposed use, firstly, from "mixed use housing development and community facilities" to "housing developments, which could include a mix with community uses. In my view, the wording in the plan provides a greater flexibility and a wider variety of uses, which would be more appropriate in this mixed area than wholly residential uses as would

be possible under the revised wording.

11.43.2. The second change proposed is to include a reference to local education providers such as Cambridge Regional College, in addition to the reference to Anglia Polytechnic University. Whilst the need for housing for students of Anglia Polytechnic University has been substantiated, a case has not been made for the need for student housing for other local education providers including Cambridge Regional College.

11.43.3. For these reasons, I do not support the changes proposed.

RECOMMENDATION

11.43.4. I recommend no modification to the RDD.

11.44 PROPOSALS SITE 4.01 (FDD) AND 9.01 (RDD)

Objections

Cristina Lazzeroni	103/1/DEP01/4_01
Mr. & Mrs. Deakin	165/1/DEP01/4_01
Sylvia R. Dalby	313/1/DEP01/4_01
H. Tyson	462/2/DEP01/4_01
P. Larmuth	534/1/DEP01/4_01
P. Howsam	683/1/DEP01/4_01
Hills Road Sixth Form College	712/1/DEP01/4_01
Cllr James Quinlan	751/2/DEP02/9_01
Jonathan Larmour	776/10/DEP02/9_01
Dr Henry Tribe	812/1/DEP02/9_01

Summary of Objections

- Most of the objections refer to matters dealt with under the East Cambridge section of Chapter 9.
- There should be a clear policy for the Airport area.
- An international airport is a necessity for Cambridge.
- Housing estates on the edges of the area should not be included in the Area of Major Change.

Inspector's Reasoning and Conclusions

11.44.1. I consider most of the matters of objection in Chapter 9, which in my opinion includes a clear policy concerning the area, namely Policy 9/4.

11.44.2. The inclusion of properties in the Area of Major Change boundary does not mean established residential areas will change. Access to development and redevelopment areas will be decided on the basis of consideration of factors such as amenity and environmental effects, as well as suitability for traffic, and other matters.

11.44.3. I note that the representation by the Sixth Form College, classified as an objection, in fact expresses support for the relocation of the Airport. Also, the objection from P Larmuth is to the Southern Fringe (see below).

RECOMMENDATION

11.44.4. I recommend no modification to the RDD in response to these objections.**11.45 PROPOSALS SITE 4.02 (FDD) AND 9.02 (RDD)****Objections**

Trumpington Environmental Action Group (TEAG)	460/34/DEP01/4_02
Rosemary Myers	553/3/DEP01/4_02
Hilda Stoneley	559/2/DEP01/4_02
Robert Stoneley	584/2/DEP01/4_02
Dr Henry Tribe	812/2/DEP02/9_02
P. Larmuth	534/1/DEP01/4_01

Summary of Objections

- Addenbrookes housing must be for staff only.
- The proposal represents the loss of a Green Belt lung, with footpaths and excellent opportunities for walking for all. There would be increased pollution and scarce species would disappear from the area.
- A station is needed at Addenbrookes. The CGB proposal should be deleted.
- Other matters are raised as in the Southern Fringe section of Chapter 9.

Inspector's Reasoning and Conclusions

11.45.1. The first objection has been met by a cross reference in the RDD.

11.45.2. The reasons for allocating this part of the Southern Fringe Area of Major Change are given in Chapters 5, 7, and 9. The strategy for the Sub-Region is to locate development close in to Cambridge. The loss of some Green Belt is inevitable to meet the development needs of the City and surrounding area. Where possible, features of value will be retained and enhanced, and access to the countryside outside the development area is to be improved. Measures will be taken to minimise travel demands and therefore pollution. Other points are considered in Chapter 9 above.

11.45.3. The decision on the CGB system is to be made by the First Secretary of State. There are no realistic proposals for a station to be built here during the Plan period.

RECOMMENDATION

11.45.4. I recommend no modification to the RDD.

11.46 PROPOSALS SITE 4.03(FDD) AND 9.03 (RDD)**Objections to Site 4.03**

The objections to this aspect of the plan are listed in Annex 3.

Objections to Site 9.03

Summary of Objections

- There are objections to the principle and scale of development; loss of Green Belt; and traffic impact.
- The proposal should be deleted because of problems of access, the availability and provision of services, coalescence of settlements, urban sprawl, noise, loss of good agricultural land and biodiversity, crime, effects on properties, and harm to the character of Cambridge.
- A different strategy should be adopted.
- The form, or certain details, of development should be specified.
- There should be no reference to the Christ's and Sidney Sussex sports ground.

Inspector's Reasoning and Conclusions

11.46.1. I deal with the points made in many of the above objections in Chapter 9 of this report, and the background to the strategic selection of the land for development is given in Chapter 5. I note that the Structure Plan does not limit the number of dwellings to be provided on this site to 1,000. It is possible that the development will not extend right up to the City boundary if the open space buffer between the City and Girton takes up some land in the City.

11.46.2. Coalescence with Girton, Histon and Impington would be avoided by retaining open land between those villages and the City. The concentration of development close to Cambridge, on sites such as this, would retain the character of Cambridge as a compact City rather than a sprawling urban settlement.

11.46.3. I do not have evidence to show that the land is of especial value for agricultural purposes or for its biodiversity, such as to justify deleting the allocation. Wherever possible, important features will be retained.

11.46.4. As at the time of the inquiry, the Council and South Cambridgeshire District Council intended to prepare an Area Action Plan for land on both sides of Huntingdon Road.

11.46.5. Planning conditions could be imposed on planning permission for development, if necessary, to require screening and landscaping, and to prevent loss of light or privacy. Such matters, and the amounts of open space and car parking to be provided, are for later consideration. Access to the A14 directly from the new development would be dangerous and would interfere with the free flow of traffic on the A14.

11.46.6. Loss of views and property values are not matters for me.

11.46.7. The treatment of the sports ground is sufficiently important to demand a firm reference in the Comments column of the Proposals Schedule. This gives residents, and users of the ground, the comfort of knowing that the ground will be retained or replaced, and developers will be in no doubt that this has to be done. The meaning of the comment is clear.

RECOMMENDATION

11.46.8. I recommend no modification to the RDD.

11.47 PROPOSALS SITE 4.04 (FDD) AND 9.04 (RDD)

Objections

Galhaith
Network Rail

274/1/DEP01/4_04
370/42/DEP01/4_04
370/43/DEP01/4_04
664/1/DEP02/9_04

The Cam Too Project

Summary of Objections

- There should be no access to the site via Fen Road.
- The Proposals Map should indicate the full extent of the action area including Chesterton Sidings in South Cambridgeshire District.
- The industrial units on the Milton/Cowley Road junction should be included within the site.
- The Cam Too Project should be incorporated in the Plan.

Inspector's Reasoning and Conclusions

11.47.1. There is no proposal in this Plan to provide access to this site from Fen Road.

11.47.2. Although it would not be appropriate for the Proposals Map to indicate the extent of development in that part of the Northern Fringe within South Cambridgeshire, Figure 9/6 does show the principal land uses for Chesterton Sidings.

11.47.3. The industrial units on Milton/Cowley Road junction are in an area that has recently been developed, and for that reason it is not necessary to include them in the Area of Major Change.

11.47.4. The Council has agreed with the Cam Too Project the insertion of a paragraph into Chapter 8 of the Plan making reference to the project.

RECOMMENDATION

11.47.5. I recommend no modification to this part of the RDD.

11.48 PROPOSALS SITES 4.06 AND 4.07 (FDD), AND 9.06 (RDD)

Objections to Sites 4.06/7

The objections to this aspect of the plan are listed in Annex 3.

Objections to Site 9.06

Countryside Properties
Dr. R. & Mrs. D. Cox

68/18/DEP02/9_06
578/1/DEP02/9_06

Summary of Objections

- These areas should not be developed, because of environmental and infrastructure problems.
- The land use for the Clay Farm site should be specified as primarily housing.

Inspector's Reasoning and Conclusions

11.48.1. Most of the points made by objectors are dealt with in Chapter 9 of this report, and the background to the strategic decision on the choice of these areas for development is given in Chapter 5.

11.48.2. The Local Plan has policies requiring the provision of infra-structure before development in urban extensions. This area will benefit from the CGB. The traffic and parking problems associated with the Hospital should not prevent the Southern Fringe development, in the light of the Structure Plan's proposals. The Addenbrooke's access road is proposed in order to prevent development at Trumpington exacerbating congestion in the village and on Long Road. Location of the development elsewhere would generate traffic, with resultant noise and pollution. Development elsewhere would also require lighting, but it is possible to reduce light pollution by designing lighting to avoid light spillage.

11.48.3. There will inevitably be a loss of open Green Belt land as a result of the Structure Plan's proposal to site large scale development in the Southern Fringe. The Area Development Framework will need to mitigate the loss by making the best use of remaining open space and providing new facilities where possible. There are several policies which protect biodiversity and other features of importance. Much of the green corridor is arable farmland, and this is likely to have limited wildlife value. The recreational use of parts of the corridor offers the opportunity to enhance biodiversity. Enhancement of some existing habitats, and creation of new sites designed to attract wildlife, will be possible.

11.48.4. A significant proportion of affordable housing will be provided. Property values are not matters for me.

11.48.5. Over 70% of the Clay Farm development will be for housing. Much of the other land put to uses such as open space, education and community facilities will be primarily intended to support the housing, and would not be proposed if not for the residential development. Paragraph 9.23 of the RDD says that the uses at Clay Farm would be primarily for residential development and open space. The objector's wording better fits both the nature of the proposal and paragraph 9.23. I adjust the suggested wording to allow for some uses to be included, if necessary, to provide for wider needs, such as recreational or educational needs not solely generated by the new housing on this site.

RECOMMENDATION

11.48.6. I recommend that the RDD be modified by deleting "mixed uses" from the Proposed Use column of the Proposals Schedule entry for Site 9.06 and replacing it with "primarily residential with ancillary uses".

11.49 PROPOSALS SITE 9.09

Objections

Countryside Properties
Addenbrooke's NHS Trust
Trumpington Meadows Land Company
Countryside Properties/Liberty Property Trust

68/22/DEP02/9_09
399/33/DEP02/9_09
798/20/DEP02/9_09
837/28/DEP02/9_09

Pre-Inquiry Changes: SCPM.002 and SCPS.004

Summary of Objections

- The area of this site is excessive.
- The description of the land uses should be amended.

Inspector's Reasoning and Conclusions

11.49.1. I deal with the extent of the Monsanto site under omission sites, in Chapter 5, and with the site's junction with the Addenbrooke's access road in Chapter 9. Early work on the design of the junction indicates that there will be sufficient capacity to accommodate the traffic from the Monsanto site as well as other traffic. As a result of my earlier conclusion concerning the extent of the site, the site area should be amended in the Proposals Schedule.

11.49.2. In order to achieve consistency with the description of land uses in paragraph 9.23 of the RDD, the description in the Proposals Schedule should be amended. The description recommended above for Clay Farm is in my view most suitable.

RECOMMENDATION**11.49.3. I recommend that the RDD be modified as follows:**

- a) By deleting "mixed uses" from the Proposed Use column of the Proposals Schedule entry for Site 9.09 and replacing it with "primarily residential with ancillary uses".**
- b) By the incorporation of SC PS.004 and SC PM.002.**

11.50 PROPOSALS SITE 9.10**Objections**

Addenbrooke's NHS Trust
Dr. Henry Tribe
Countryside Properties/Liberty Property Trust

399/34/DEP02/9_10
812/3/DEP02/9_10
837/29/DEP02/9_10

Summary of Objections

- The land uses relevant to this site should be changed.
- A station should be provided at Addenbrooke's.

Inspector's Reasoning and Conclusions

11.50.1. In order to give consistency with changes suggested by the Council to Policy 9/5 the land uses for site 9/10 should be expanded.

11.50.2. The area is to be provided with the CGB system. There are no realistic proposals for a station here.

RECOMMENDATION

11.50.3. I recommend that the RDD be modified by the addition of the words "and research uses", after "Clinical development", in the Proposed Use column of the Proposals Schedule entry for Site 9/10.

11.51 PROPOSALS SITES 4.08 AND 4.17 (FDD)**Objections**

V & M Whittaker	439/1/DEP01/4_08
Network Rail	370/20/DEP01/4_17
V & M Whittaker	439/1/DEP01/4_17
	439/4/DEP01/4_17
Glisson Road/Tenison Road Area Residents Assoc.	688/1/DEP01/4_17
	688/2/DEP01/4_08

Summary of Objections

- The Triangle site should not be linked with the rest of the Station Area redevelopment.
- The bus and coach station should be moved to the Station Road area and the redevelopment should include a multi-storey car park.
- There should be a comprehensive traffic management scheme to the north of Station Road, to mitigate the effect of additional traffic from the Station Area redevelopment.

Inspector's Reasoning and Conclusions

11.51.1. The Triangle Site is so closely connected with the remainder of the Station Area that it is sensible for it to be included within the Area of Major Change. However, there is no reason why applying the same policies to the two sites should delay development on either.

11.51.2. The Plan highlights the provision of an integrated transport interchange as a key part of the Station Area redevelopment, and this would include facilities to cater for buses. However, there is no evidence that it would be viable to move the City Centre bus station from Drummer Street.

11.51.3. It is envisaged that a multi-storey car park will be provided within the Station Area, as the existing parking arrangements at the station could be regarded as an inefficient use of land.

11.51.4. A transport assessment will be required in respect of any developments in this area, and the Council will be able to seek appropriate mitigating measures to address any impact arising from an increase in traffic.

RECOMMENDATION

11.51.5. I recommend no modification to the RDD.

11.52 PROPOSALS SITES 6.08, 6.11/2 (FDD), AND 9.12 (RDD)**Objections**

Mrs. S. Finer	253/1/DEP01/6_08
Nicholas Finer	285/1/DEP01/6_08
Concerned Residents Of N.W. Cambridge (CRONC)	336/2/DEP01/6_08
Storey's Way Residents' Association	463/4/DEP01/6_08
Frank Gawthrop	688/7/DEP01/6_08
Concerned Residents Of N. W. Cambridge (CRONC)	715/4/DEP01/6_08
Mrs S. Finer	253/2/DEP01/6_11

Nicholas Finer	285/2/DEP01/6_11
Concerned Residents Of N.W. Cambridge (CRONC)	336/3/DEP01/6_11
Storey's Way Residents' Association	463/5/DEP01/6_11
Concerned Residents Of N. W. Cambridge (CRONC)	715/5/DEP01/6_11
Mrs S. Finer	253/3/DEP01/6_12
Nicholas Finer	285/3/DEP01/6_12
Concerned Residents of NW Cambridge (CRONC)	336/4/DEP01/6_12
Storey's Way Residents' Association	463/6/DEP01/6_12
Concerned Residents of NW Cambridge (CRONC)	715/6/DEP01/6_12
Jenny And Lawrence Greene	825/1/DEP02/9_12

Summary of Objections

- There is no need for these sites to be developed.
- Development would harm wildlife, views of Cambridge, the approaches to the City, and the character of St Giles Cemetery.
- Bus services are inadequate. There would be traffic congestion.
- Development should incorporate specified measures to mitigate its impact.

Inspector's Reasoning and Conclusions

11.52.1. Some of the objectors' points are dealt with above in Chapters 9 and 5. These sites have been allocated for development for some years. The University has shown that a need for staff housing exists, sufficient to justify the development of these sites. The possibility that the University's West Cambridge site would be adequate to meet the need was specifically rejected during the consideration of the Structure Plan. College land is not necessarily available for University development. College sports fields are often of environmental and recreational importance, and placing new housing on their fringes would harm these functions.

11.52.2. There is no evidence that Huntingdon Road could not accommodate the traffic generated by development in the area, but a TA would be undertaken and public transport needs would be assessed. Vehicular access from Storeys Way will not be permitted.

11.52.3. The University's Master Plan is not the subject of my report, but both the Council and the University are committed to the further planning of the area. Policy 9/1 of the Plan is relevant. Such matters as building heights, the relationship to St Giles Cemetery, house type and density, and the effects on the approach to the City will be considered. In my opinion the views of the City will not be harmed by the development of these sites with housing on 3 sides.

11.52.4. Again there is no evidence that the area is particularly noteworthy for its biodiversity, but master planning gives opportunities for enhancement.

11.52.5. There are however changes necessitated by my conclusions and recommendations in section 9.22 above. All of these sites should be combined into one, to be numbered 9.12, and with consequential changes resulting from the aggregation of 3 sites into one and from other conclusions in section 9.22.

RECOMMENDATION

11.52.6. I recommend that the RDD be modified as follows:

a) Add to the address of Proposals Site 9.12 the words "and land at Gravel Hill Farm", delete the site area and replace with "11.83", and add to the Comments column the words "Otherwise, the site is available for immediate development."

b) Delete Proposals Sites 9.15. and 9.16.

11.53 PROPOSALS SITE 4.09 (FDD) AND 9.13 (RDD)

Objections

The objections to this aspect of the plan are listed in Annex 3.

Summary of Objections

- The Bell School land west of Babraham Road should not be allocated for housing development. It is Green Belt.
- Development would cause harm to biodiversity, the safety and free flow of traffic, the character of the area on the open southern fringe of the City, the setting of the City, and the amenities of the occupants of existing dwellings.
- The new development would be subject to flooding and would cause drainage problems.
- If the site is allocated, certain design and layout matters should be specified in the Plan.
- The boundary of site 9.13 is not clear.

Inspector's Reasoning and Conclusions

11.53.1. The Structure Plan, which it is not for me to question, calls for housing and mixed use development in various locations in Cambridge. One of these is land south and west of Addenbrooke's, where land is to be released from the Green Belt. In my opinion the Babraham Road site should be seen as part of this land release, being the first open land south of Addenbrooke's and nearby development. It is logical to take the boundary of the area to be released up to the edge of the existing built-up area west of the A1307. National and Structure Plan policy also desires higher housing densities than in the past.

11.53.2. The south-western corner of the site lies within the flood plain, and the most recent flood risk assessment available to the inquiry confirms that the great majority of the site is not at risk of flooding. Measures could be taken in the planning and implementation of the scheme to ensure that houses are not flooded, for example by altering the levels of part of the site to provide flood storage. Any planning application would have to investigate this further and make any necessary provision, taking account of climate change. On present evidence I do not see flooding risk as a reason for deleting the allocation.

11.53.3. The hedgerow forming the southern boundary of the site, and the ditch along the western side of the land, are City Wildlife Sites. The springs at Nine Wells are further away. Building could take place without the need to disturb these. As for the site itself, much of the land is school playing fields or grazed by horses. Plant species of interest are few. The insects attracted because of the horse grazing attract birds and foraging bats. However this is dependent on the management of the land, which could change at any time.

11.53.4. As the site includes playing field land and will need informal recreational provision for its new population, the new proposal will have to provide open space. A development scheme, retaining the existing hedges and some areas of managed grassland, could keep the interest of the site at its present level. For example, a different grazing regime, following on from a development which featured open space provision, could improve the value of the land for wildlife, as horse grazing

can be detrimental to the plant assemblage.

11.53.5. The dominant feature on this section of the City's southern side, seen from roads and paths, is the bulk of Addenbrooke's hospital, rising above other nearby development and the countryside in the foreground of views. There are also trees partially screening the objection site. Additional housing development would not be out of keeping with this urban edge character, and would not harm the setting of the City. Because of the scale of the Hospital buildings, there is no benefit in restricting the height of the proposed housing to below 3 storeys. The distribution of dwelling blocks of different heights depends on a detailed analysis of the site, its surroundings and the development sought.

11.53.6. In my opinion there are a number of possibilities of gaining vehicular access to the land. There is an existing access to Babraham Road, although of course this is not used as an access to a housing development. There are houses close to this track, and it appears that the Bell School does not own all the land needed. However the scale of the housing proposal is such that the purchase of third party land would be possible in the future, if necessary. The details and operation of the junction with Babraham Road are subject to an iterative process of analysis. It seems to me too soon to say that an acceptable junction design would not result, or that third party land would be withheld from negotiations. A new junction at this point would increase the area of hard surfacing and the amount of street furniture, but the location is within the urban area.

11.53.7. There could be possibilities of creating an access via intervening land to Red Cross Lane to the north, although the present access via Greenlands runs too close to several dwellings to be suitable for vehicular use.

11.53.8. To the north-west open land safeguarded for long-term development lies between the site and the continuation of Red Cross Lane. Access via this route is not favoured by the Highway Authority, but the possibility remains. The effects of mixing residential and hospital traffic would have to be considered.

11.53.9. A final access possibility would be to Hills Road/Worts Way through the grounds of the School. The grounds are largely protected open space. The effects and costs of any access would have to be balanced against the need for it to be located in the grounds.

11.53.10. Babraham Road is congested at peak hours. Development of this site, as with many others, will require mitigation measures. The local authorities have a long term transportation strategy which will also need to address the impacts of this development along with building elsewhere in the south of the City. Rights of way for pedestrians are outside the site and building on the land would not close them.

11.53.11. Not all facilities needed by residents are within a convenient distance of the allocation. However the employment and other facilities associated with Addenbrooke's are close, and the bus station at the Hospital is a reasonable distance away. There is also a bus service along Babraham Road, and public transport, cycle and pedestrian provision will be improved as part of the large scale development of the Southern Fringe generally. My view is that the site should not be ruled out on grounds of access to services.

11.53.12. The normal activities of the occupants of properly designed and laid-out dwellings should not, in principle, cause noise and disturbance for the occupants of existing houses. There is unlikely to be a need for any buffer between the new and the existing, depending on the height and nature of the residential development provided adjacent to the present houses. It is a matter of detail for the Council, in consultation with other parties, to decide the layout and height of development.

Similarly matters of drainage, parking and landscaping are for detailed attention when the proposals are at a more advanced stage. I have also considered other points made by objectors, including those regarding pollution and the health of local residents and Hospital patients, but in my view they do not add substantial weight to the arguments put forward against the allocation. Other concerns of objectors, such as loss of views and house values, are not matters for me.

11.53.13. In the circumstances set out above, I conclude that the allocation should remain and that there are no reasons in principle why I should interfere with the detailed planning of the proposed development by specifying that particular details be incorporated in the development. Nor do I consider it necessary to amend the way in which the site is shown on the Proposals Map: the extent of the site, and its boundaries, are sufficiently clear.

RECOMMENDATION

11.53.14. I recommend no modification to the RDD.

11.54 PROPOSALS SITE 9.14

Objections

Countryside Properties
Mrs J D Waton

68/29/DEP02/9_14
772/1/DEP02/9_14

Pre-Inquiry Changes: SCPS.005

Further Proposed Changes: FPC 28

Summary of Objections

- The land use for the site should be specified as primarily housing.
- Development would harm the environment and the amenities of residents.

Inspector's Reasoning and Conclusions

11.54.1. I deal in Chapter 9 with most of the points raised. The design and layout of the new development should ensure that the amenities of existing residents are not harmed. Effects on property values are not matters for me.

11.54.2. The great majority of the development will be for housing. Paragraph 9.23 of the RDD says that the uses at Glebe Farm will be primarily for residential development. The objector's wording better fits both the nature of the proposal and paragraph 9.23.

11.54.3. As a result of my conclusions in Chapter 5, regarding housing omission sites, I accept the various changes to the Proposals Schedule for this site put forward by the Council.

RECOMMENDATION

11.54.4. I recommend that the RDD be modified as follows:

- a) By deleting "mixed uses" from the Proposed Use column of the Proposals Schedule entry for Site 9.14 and replacing it with "primarily residential".**
- b) By the incorporation of SC PS.005 and of FPC28.**

11.55 PROPOSALS SITE 9.20

Objections

Highways Agency

697/4/DEP02/9_20

Summary of Objections

- There are concerns about providing northern slip roads to the M11 at the interchange with Maddingley Road.

Inspector's Reasoning and Conclusions

11.55.1. I deal with this in Chapter 9 of this report, and conclude that there is insufficient evidence that slip roads will be both required and suitable.

RECOMMENDATION

11.55.2. I recommend that the RDD be modified by the deletion of Site 9.20 from the Proposals Schedule.

11.56 PROPOSALS SITE NETHERHALL UPPER SCHOOL

Objections

Pre-Inquiry Changes: SCPM.001

Dr. Anna Maria Bedford

1243/1/DEP04/X

Summary of Objections

- The amendment of the Green Belt in this location would set a dangerous precedent, and building on the Netherhall Upper School site would harm nature conservation interests and have a harmful traffic impact. Amalgamation of the upper and lower schools would lead to a reduction in capacity contrary to other policies in the Plan.

Inspector's Reasoning and Conclusions

11.56.1. The proposed change would remove a small area of land adjacent to the existing school buildings from Green Belt designation. The change would not compromise the purposes of the Green Belt as set out in Policy P 9/2a of the Structure Plan, nor would it harm the compact form of the City, or have a significant effect on the separation between the existing urban area and the urban expansions or the green corridors or historic views. The removal of such a small area of land from the Green Belt would not create any form of harmful precedent, particularly in the context of the urban extensions provided for in the Plan.

11.56.2. The Plan as proposed to be changed would not contain details of new buildings on the site, and it is not therefore possible to determine at this stage the likely traffic impact. Policy 8/2 requires the transport implications of proposed development to be assessed at the planning application stage, and objections relating to the traffic impact of any new buildings on this site would have to be considered at that time. Questions of school capacity are a matter for the County

Council as local education authority in the first instance.

RECOMMENDATION

11.56.3. I recommend that the RDD be modified by the incorporation of Pre-Inquiry Change SCPM.001.

12. BIBLIOGRAPHY

12.1 BIBLIOGRAPHY

Objections

English Heritage

338/25/DEP01/BIB

Summary of Objections

- The Green Belt Study prepared by Landscape Design Associates for South Cambridgeshire in 2002 should be included.

Inspector's Reasoning and Conclusions

12.1.1. This document is now included in the Bibliography in the RDD.

RECOMMENDATION

12.1.2. I recommend no modification to the RDD.

13. GLOSSARY

13.1 GLOSSARY

Objections

Downing College	305/1/DEP01/GLOSS
English Heritage	338/24/DEP01/GLOSS
Cambridgeshire County Council	55/8/DEP02/GLOSS
Addenbrooke's NHS Trust	399/36/DEP02/GLOSS
Countryside Properties/Liberty Property Trust	837/31/DEP02/GLOSS

Pre-Inquiry Changes: SCG.001 & SCG.002

The House Builders Federation	362/4/DEP04/GLOS_1
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Summary of Objections

- The difference between the University and the Colleges should be highlighted.
- Some references are missing or incorrect.
- A change is sought to the definition of "key workers".
- The role of any Area Development Frameworks which are neither DPDs nor SPDs is unclear.

Inspector's Reasoning and Conclusions

Most objections have been answered by the changes introduced in the RDD and by the pre-inquiry changes.

Those explaining the terms "high technology", "research establishments" and "key worker housing" have not been resolved. The definition of the first of these terms, given in the Glossary, is already lengthy. Its final section makes plain that the list of activities given is not exhaustive, and gives the flexibility to encompass the activities comprised in Policy 9/5 and its supporting text as recommended for modification.

Research establishments however can include commercial research facilities. The fact that these are also covered by Class B uses does not mean that they are not capable of being research establishments. The proposed change does not go far enough in dealing with these establishments.

If the change suggested by Addenbrooke's to the definition of key workers is intended to include those involved in the care and comfort of the community, then it is unnecessary. If it is intended to confine the definition to such persons, then it is overly restrictive and would contradict paragraph 5.10, as would the change suggested by Countryside Properties/Liberty Property Trust. The glossary definition and the explanation in paragraph 5.10, together with the proposed register mechanism allows the Council to respond to varying needs during the Plan period, as well as to changes in national policy advice, and no change is necessary.

There is a counter-objection by the HBF to the proposed change which defines Area Development Frameworks. However it is for the Council to decide whether to progress its Area Development Frameworks to SPD or DPD status.

RECOMMENDATION

I recommend that the RDD be modified as follows:

- a) incorporating SCG.001 and SCG.002**
- b) deleting from the Glossary entry for research establishments the words "are taken to mean" and replacing those words with "include commercial research facilities and".**

14. PROPOSALS MAP

14.1 PROPOSALS MAP

Objections

The objections to this aspect of the plan are listed in Annex 3.

Summary of Objections

- There are objections to the inclusion of specific housing sites on the Proposals Map, and to the exclusion of other potential development sites and of locations suitable for tall buildings.
- Other sites should be shown for retailing, or as protected open space or shopping centres. Some primary shopping frontages are incorrect.
- Sites should be excluded because they are not realistically developable, or because development would be harmful to interests of acknowledged importance.
- Road proposals should be shown, namely Addenbrooke's access road.
- The green corridor is shown for the Southern Fringe, but not for other Areas of Major Change. The Green Belt notation for the University land between Maddingley Road and Huntingdon Road needs to be omitted. There should be a notation for cross-boundary development.
- Wildlife corridors, more wildlife sites, and different boundaries for the City Wildlife Site adjoining the M11, should be shown.
- The Proposals Map is generally difficult to read. Features of heritage interest should be shown.
- Various boundary and other changes to the Southern Fringe, and to sites and notations within it, should be made.
- The 2 Perse School sites, 1 Regent Street, St Matthew's Piece and the former Blue Circle land should not be protected open space. Other objectors ask that St Matthew's Piece be protected.
- Additional land around Coldhams Common should be included in the Green Belt.
- The site area of Site 5.05 is incorrect, and the residential allocation should include land designated as open space for that housing development. Land at Homerton College should not be designated as protected open space.
- The Controlled Parking Zone should be shown on the Proposals Map.
- The multi-storey car park at Cambridge Leisure and the Pickfords site should not be included within the "Protected Industrial Sites" designation on the Proposals Map.
- Some small areas of land at Storeys Way should not be subject to the "protected open spaces" notation as they are not available for open space use.

Inspector's Reasoning and Conclusions

Areas of Major Change and Housing Development

14.1.1. I deal with objections to the development of sites in Areas of Major Change above, in Chapter 9. I consider housing omission sites in Chapter 5 of this report.

14.1.2. The open space requirements for Areas of Major Change are clear from Chapter 9 of the RDD. My conclusions in that Chapter regarding the Green Belt on the University land between Madingley Road and Huntingdon Road mean that the southern section of Green Belt on that land should be deleted from the Proposals Map. A further modification consequent upon my conclusions and recommendations regarding this Area of Major Change is that Proposals Sites 9.07 and 9.08 should be combined into one site, 9.07, with land to the south added. Proposals Sites 9.12, 9.15, and 9.16 should be combined into one site, to be numbered 9.12.

14.1.3. In East Cambridge land is being released from the Green Belt so there is no need for the Area of Major Change to show Green Belt inside its borders (see also 9.17.11 et seq above). Cross-boundary proposals should not be shown because the Proposals Map must not attempt to indicate development in another local authority area. The indicative figures and the text can indicate cross-boundary working and Areas of Major Change.

14.1.4. In the Southern Fringe some boundary changes have been made so that the RDD conforms more closely to objector suggestions. In relation to unsatisfied objections, land west of Trumpington will provide significant numbers of dwellings towards meeting the Structure Plan requirement. The same applies to site 9.13, and safeguarded land for Addenbrooke's longer term expansion is provided elsewhere. The City Wildlife Site alongside site 9.13 is properly included for its wildlife value and leaves substantial land available for development. For reasons given in Chapter 4 of this report I consider that the flood zones should not be removed from the Proposals Map.

Open Space and Green Belt

14.1.5. I concur with the Council that both of the Perse School sites are worthy of protection for their value as open space. Both are attractive grassed open areas, and are seen from roads fronting them. The Preparatory School grounds support a number of trees. The Senior School land will be appreciated by the residents of houses which partly surround it. The Long Road frontage put forward by the School in case partial release is recommended is particularly visible. Both sites are used by pupils, and the Senior School pitches are used by clubs too. The protected open space notation is not outweighed by the School's need for flexibility, on the evidence I have, and should not be deleted. However it is open to the School to make applications for planning permission at the appropriate time and to have its needs and precise proposals assessed in the light of the Plan's provisions for education and open space.

14.1.6. On the other hand the land at 1 Regent Street is occupied by buildings, car parking, and manoeuvring areas. SCPM.0005 is intended to delete the protected open space notation.

14.1.7. SC PM.004 amends the Protected Open Space designation at Trinity Hall Grounds to exclude Coote House and its immediate grounds together with a strip of land subject to the planning permission for new student accommodation, which partly meets the objection by Trinity Hall. I agree that it is not appropriate for these areas to be subject to designation, because they do not fulfil an open space function. However, the pavilion is associated with the open space use, and for this reason should remain within the protected area.

14.1.8. At Coldhams Common the present Green Belt boundary is satisfactory because it follows physical features, such as streams, ditches, and vegetation, in

many places. To an extent the Whitehill allotments and the Abbey Meadows playing fields are projections into the developed area, with buildings and other urban features on 2 or more sides. There is a need to establish boundaries that will endure, and exceptional circumstances are required to justify altering the boundary. In this case those circumstances do not exist.

14.1.9. I deal with land at George Nuttall Close in section 4.7. St Matthew's Piece and the former Blue Circle land are also reported elsewhere in this document.

Other Uses and Transportation

14.1.10. Burleigh Street and Kings Parade are correctly included as primary shopping frontages because of the number of Class A1 uses on their frontages. The former includes several charity shops but also has a department store and is located near a main entrance to the Grafton Centre. Kings Parade appears to me to have high pedestrian flows. I consider the Beehive Centre in section 6.10 of this report.

14.1.11. The extent of the Controlled Parking Zone is determined by the Highway Authority, and could be changed during the lifetime of the Plan. For this reason it is not appropriate to show it on the Proposals Map.

14.1.12. SC PM.006 excludes the multi-storey car park at Cambridge Leisure from the Clifton Court and Clifton Road Protected Industrial Site, and I support it in the interests of accuracy. I consider the question of excluding other parts of this site from the designation in Chapter 11.

14.1.13. The exact route of the Addenbrooke's access road had not been determined by the end of the inquiry. No more than a diagrammatic line is shown on the draft Area Development Framework. The scale of the Proposals Map makes it impracticable to show Scheduled Ancient Monuments, but other features suggested by English Heritage are shown.

Wildlife

14.1.14. In working with the existing Local Plan the Council has experienced difficulties using the wildlife corridors, which are depicted on the Proposals Map of that Plan. The Council has not used the corridors, for example, to refuse planning permission for any proposal. It is also difficult to determine the precise boundaries of corridors and therefore to depict them on the Proposals Map. Some of the boundaries on the Proposals Map of the existing Local Plan are notional and arbitrary, in some cases merely being straight lines joining features of value.

14.1.15. PPS9 does not ask Councils to identify areas other than designated sites, and this the Plan does. There are also various Plan policies which protect open space, hedges and other features which have value for wildlife. One element of this value which can be protected under these policies is the contribution the feature might make to a network, corridor or migrational route of importance to wildlife.

14.1.16. My overall conclusion is that wildlife corridors should not be indicated on the Proposals Map, in the absence of a need to do so and because of the practical problems involved in identifying them precisely and in using them.

14.1.17. As for the number of wildlife sites shown on the Proposals Map, this is determined by the number which meet the criteria for identification of sites of value. This is a matter for regular review, and the Plan already says this.

14.1.18. I consider the M11 wildlife site in section 11.18.

Other Matters

14.1.19. Other objections have been resolved by changes made to the FDD in

drawing up the RDD.

14.1.20. In my opinion the Proposals Map is sufficiently clear to do its job of indicating the locations of proposals and areas where particular policies will apply. No additional landmarks should be added in case they appear to be proposals.

14.1.21. I deal with objections relating to site 5.05 and land at Homerton College in chapters 11 and 4 respectively. In Chapter 3 I consider tall buildings.

14.1.22. Several sections of earlier Chapters in this report include recommendations to modify the Proposals Map. I do not repeat those recommendations here.

RECOMMENDATION

14.1.23. I recommend that the RDD be modified as follows:

- a) By the incorporation of SC PM.004-006.**
- b) By the deletion from the Proposals Map of the Green Belt notation on land bounded on the Proposals Map by the M11, Proposals Site 9.20, Madingley Road, Lansdowne Road, and Proposals Sites 9.07 and 9.08, and by the inclusion of this land and Proposals Site 9.20 in the Proposals Sites notation as part of Proposals Site 9.07.**
- c) By the deletion from the Proposals Map of the figure 9.08 and of the boundary line separating Proposals Sites 9.07 and 9.08.**
- d) By the deletion from the Proposals Map of the figures 9.15 and 9.16 and of the boundary lines separating Proposals Sites 9.12, 9.15 and 9.16.**