



Local Development Framework North West Cambridge Area Action Plan

Sustainability Appraisal/Strategic Environmental Assessment Adoption Statement

Introduction

Cambridge City Council and South Cambridgeshire District Council adopted the North West Cambridge Area Action Plan (AAP) on the 22nd October 2009. The AAP forms part of each Council's respective Local Development Framework (LDF) and replaces the relevant parts of the existing Cambridge Local Plan 2006.

This statement has been prepared in accordance with the Environmental Assessment of Plans and Programmes Regulations 2004 (16) (3) and (4), which require a statement to be produced on adoption of a plan or programme, to detail:

1. How environmental considerations have been integrated into the plan or programme;
2. How the Environmental Report has been taken into account;
3. How opinions expressed through public consultation have been taken into account;
4. The reasons for choosing the plan or programme as adopted, in the light of the other reasonable alternatives dealt with;
5. The measures that are to be taken to monitor the significant environmental effects of the implementation of the plan or programme.

Planning Policy Statement 12 (Local Spatial Planning) widens these considerations from environmental to the appraisal of the economic, social and environmental sustainability of the plan, so this statement provides information on the wider sustainability appraisal process.

1. How sustainability considerations have been integrated into the plan.

The LDFs for Cambridge City and South Cambridgeshire aim to improve the overall quality of life for the residents of both districts, in a way that will also benefit future generations. The concept of sustainable development lies at the heart of both LDFs, and is closely related to the national strategy for sustainable development, which has four objectives, namely:

1. Social progress which recognises the needs of everyone;
2. Effective protection and enhancement of the environment;
3. Prudent use of natural resources; and
4. Maintenance of high and stable levels of economic growth and employment.

Policy context

The North West Cambridge AAP identifies land to be released from the Cambridge Green Belt, to contribute towards meeting the long-term development needs of the University of Cambridge. The AAP has been prepared against the context of national and regional planning policy, with which the plan has to be in conformity.

The regional context for the AAP was originally set out in the Regional Planning Guidance for East Anglia (RPG6), which has since been replaced by the Regional Spatial Strategy (2008). Both these plans aim to focus a higher proportion of growth into the Cambridge Sub-Region, setting a sequential approach to the planning of development. In particular, the Regional Spatial Strategy identified the need to make the most of the development potential of land “on the periphery of the built-up area of Cambridge on land released from the green belt following the Cambridgeshire and Peterborough Structure Plan 2003 and through the Cambridge Local Plan and development plan documents prepared by the local planning authorities.” Such a policy position is based on the need to provide for a sustainable pattern of development to accommodate necessary growth in the Sub-Region, with a better balance between employment and housing focussed on Cambridge and the surrounding area.

RPG6 informed the strategy taken in the Cambridgeshire and Peterborough Structure Plan (2003 – now in part replaced by the Regional Spatial Strategy). A number of the Structure Plan policies have been saved, including Policy P9/2c, which identified land at North West Cambridge for release from the Green Belt for housing and mixed-use development to be reserved predominantly for University-related uses.

North West Cambridge Area Action Plan Policy Approach

The North West Cambridge Area Action Plan sets out the policies and principles that will need to be taken into account in bringing forward development of this new urban extension so that the special character of the

area is retained, and to achieve an attractive, high quality, sustainable community that is an exemplar of sustainable living with low carbon and greenhouse gas emissions.

Vision, Objectives and Development Principles

This chapter of the AAP draws together the Vision, Objectives and Development principles that will contribute to the development of North West Cambridge becoming a new University quarter, which will contribute to meeting the needs of the wider city community, and which will embody best practice in environmental sustainability. This includes a requirement for a Masterplan to be developed in order to ensure that new development respects to its surroundings and is built to a high quality of design and sustainable construction, makes provision for all necessary infrastructure (social and physical) and achieves the key development principles for the site.

Site and Setting

This chapter details to extent of the site for North West Cambridge. It details the revisions to the boundary of the Cambridge Green Belt to accommodate development during the plan period and safeguards land for development beyond 2016 to meet the longer-term development needs of the University.

Housing

This chapter sets out the policies related to the policies related to the housing element of development at North West Cambridge. It sets the requirement for the site to provide for approximately 3,000 dwellings and 2,000 units of student accommodation. Of the housing, 50% (i.e. 1,500 dwellings) will be affordable housing to meet the needs of Cambridge University and College key workers. The chapter also sets the basis for the provision of a sustainable, inclusive mixed community at North West Cambridge, with affordable housing intermingled with the market housing in small groups to promote social inclusion. In addition, a suitable mix of housing types, sizes and tenures will be required to meet the needs of all ages and sectors of society, including those with disabilities.

Employment and University Uses

This chapter sets the requirements for employment land at North West Cambridge to provide an employment development cluster focussing on employers with strong University links and academic association with cognate University activities, encouraging the development of a higher education cluster benefiting from close proximity to the University and thus benefiting the economy of Cambridge and the UK. Provision is also made for the development of small-scale offices within the local centre, to provide for local employment opportunities and a more vibrant local centre.

Travel

The focus of this chapter is the development and planning of transport systems that aim to reduce the need to travel and maximise the use of sustainable modes of transport to achieve a modal share of no more than 40% of trips to work by car (excluding car passengers). The number of vehicles access points to the site will be minimised, with a new route developed to link Madingley Road and Huntingdon Road. This road will be designed as part of the development and its design will be based on low vehicle speeds, giving priority to provision for walking, cycling and public transport, including safe and convenient crossings for pedestrians and cyclists, in order to encourage travel by more sustainable modes. High Quality Public Transport and provision for cyclists and pedestrians will link the site with the to key destinations such as the local centre and the wider area. Parking standards will aim to minimise the amount of car parking and to maximise the amount of cycle parking.

Community Services and Facilities

The development of North West Cambridge will require an appropriate level of services and facilities, including public art, to be provided within the development to serve the needs of the community, including those who will come to live, work and study within the site. The provision of such facilities will help with the creation of a balanced community.

Recreation

In order to encourage healthy lifestyles and a high quality of life and entertainment, public open space and sports facilities will need to be provided on site. Such provision will also help to enhance the setting of the City and add to its special character, amenity and biodiversity.

Natural Resources

The new urban extension at North West Cambridge will be an exemplar of sustainable living, designed to adapt to the predicted effects of climate change through the application of high levels of sustainable design and construction standards and using decentralised energy to minimise carbon and greenhouse gas emissions. Surface Water Drainage will be designed as a sustainable drainage system to reduce the overall run-off values leaving the site, control the rate of flow and improve water quality. Water storage areas should be designed and integrated into the development with drainage, recreation, biodiversity and amenity value.

Delivery

This chapter deals with a the aspects of the delivery of the new urban extension at North West Cambridge, from sustainable construction processes, strategic landscaping, phasing and need, and the use of planning obligations to enable provision of necessary infrastructure (both physical and social).

Monitoring

In order to monitor the performance of policy, the delivery of development and impacts on the environment, the Area Action Plan also includes a series of indicators that will be monitored through the Councils' respective Annual Monitoring Report. Such monitoring will allow the impact of the development on the delivery of sustainable development objectives to be monitored.

2. How the Sustainability Appraisal has been taken into account.

The Sustainability Appraisal has contributed to the development of the Area Action Plan by providing an independent assessment of the sustainability of the Councils' proposed options and policies as they were developed. It demonstrates that sustainability considerations have been incorporated into the development of the Area Action Plan from an early stage, and provides a formal statement and audit trail of the assessment.

The production of the Final Sustainability Appraisal Report is a key output of the process of plan preparation. It reflected and supported the draft Area Action Plan on which formal public consultation and participation was carried out. The first stage in this process was to determine the scope of the Sustainability Appraisal and to set out the Sustainability Appraisal Framework, which was then used to assess the Area Action Plan.

Guidance prepared by the Office of the Deputy Prime Minister in 2005 (Sustainability Appraisal of Regional Spatial Strategies and Local Development Documents) confirms that one Scoping Report can be prepared for several Local Development Documents provided that it gives sufficient information at the level of detail required for each individual document concerned. An addendum can then be produced for each individual document, to introduce the purpose and objectives of the document in question and to identify any specific sustainability issues that should be taken into account in the Sustainability Appraisal.

Both Cambridge City Council and South Cambridgeshire District Council had produced separate Scoping Reports¹ for the Sustainability Appraisals of their Local Development Frameworks. For the purposes of the North West Cambridge Area Action Plan, it was decided to draw upon these and to identify specific sustainability issues relating to North West Cambridge by the way of a Scoping Report Addendum². The information gathered was used to create a set of sustainability objectives, which could be used to test emerging options and policies. A comparison was made between the sustainability objectives and decision-making criteria in the Cambridge City Council Scoping Report and the South Cambridgeshire Scoping Report, in order to develop the joint sustainability objectives for appraising the North West AAP. The South Cambridgeshire objectives and decision-making criteria were used as the starting point and some minor changes were made to take into account the City Council's sustainability objectives. In most cases it was felt that the two Councils' sustainability objectives were compatible with each other and

¹ Cambridge Local Development Framework SA Scoping Report March 2005, South Cambridgeshire District Council SA Scoping Report, January 2006

² Scoping Report for the North West Cambridge Area Action Plan, August 2006

change was not necessary, and that all objectives were applicable to North West Cambridge.

A set of indicators was also created, to provide evidence on the current state of the environment, as well as social and economic factors. These indicators were tested against other geographical areas in order to provide a comparison. This process helped to identify key sustainability issues for North West Cambridge and highlighted policy issues that should be explored, as detailed in table 1 of the Scoping Report Addendum.

The key sustainability issues identified in the Scoping Report Addendum influenced the development of plan policies and objectives. Section 3 and Appendices V of the final SA Report set out the analysis of the policies against the sustainability objectives. The objectives of the draft AAP were tested against the sustainability objectives through the Sustainability Appraisal of the Issues and Options Report as part of Task B1. This provided information to the Councils and representors on the compatibility between the AAP objectives and the sustainability objectives.

The significant effects of the options, and subsequent policies, were analysed against the sustainability objectives, which provided information on their economic, social and environmental impacts. Analysis included the scale and nature of the impact along with cumulative, secondary and synergistic impacts. Both detailed assessment matrices and summaries were included in the Final Sustainability Appraisal Report. This provided useful information to both representors and the Inspectors on the impacts of the policies of the plan.

The analysis of the impacts of the AAP policies and proposals also indicated opportunities to improve the sustainability of the plan and mitigation measures that may be required to help resolve any negative impacts. The measures envisaged to prevent, reduce and as far as possible offset any significant effects on environmental, social and economic objectives are set out in section 3.10 and Appendix V of the Final Sustainability Report. The SA process has helped to inform the development of the AAP at all stages of the plan making process (Issues and Options, Preferred Options and Submission stages).

3. How consultation has been taken into account (draft plan and the Environmental Report)

In this statement the Councils are required to detail how opinions expressed in response to consultation have been taken into account.

Key Environmental Bodies

The Strategic Environmental Assessment Directive requires that authorities referred to in Article 6(3) shall be consulted when deciding the scope and level of detail of the information that should be included in the Environmental Report. In England, the key bodies are the Environment Agency, English

Heritage and Natural England (formerly English Nature and the Countryside Agency).

As mentioned previously, for the purposes of the appraisal of the AAP, it was decided to produce a Scoping Report Addendum, which drew upon information contained in the Scoping Reports produced by Cambridge City and South Cambridgeshire District Councils for the SA of their Local Development Frameworks. Both of these Scoping Reports had been made available for consultation with the key environmental bodies, as detailed in Appendix 5 of the City Council's Scoping Report and Appendices 7 and 8 of the South Cambridgeshire Scoping Report. The Scoping Report Addendum was sent out for consultation between the 21st August and the 19th September 2006. Consultation was carried out with the four SEA consultation bodies (the Environment Agency, Natural England, The Countryside Agency and English Heritage) and other key stakeholders. This consultation enabled these bodies to comment on the appropriateness of the objectives, indicators, baseline assessment and issues/problems. No changes were considered necessary as a result of this consultation.

Public Participation

The Strategic Environmental Assessment Directive requires early and effective opportunity within appropriate timeframes for people to express their opinion on the draft plan or programme or its submission to the legislative procedure. The Councils undertook a series of public consultation events on the AAP and its Sustainability Appraisal prior Submission to the Secretary of State in May 2008, which triggered a further round of public consultation. Full details can be found in the Self Assessment of Soundness and Statement of Consultation³, produced to meet the requirements of Regulation 28(1) (c&d) of the Town and Country Planning (Local Development) (England) Regulations 2004, which is available on the Councils' websites.

Issues and Options Consultation (Regulation 25)

Consultation on the North West Cambridge Issues and Options Report and its associated interim Sustainability Appraisal took place for six-weeks between the 25th September and the 6th November 2006. Given that the proposals contained within the AAP would have a significant impact on the area, it was decided to extend this consultation to wider public consultation, despite this not being a requirement of the Regulations. Such an approach was also felt to be consistent with the emphasis on early public participation in the plan making process. As part of the consultation, a number of exhibitions were held and an interactive website was set up to assist access to the documents and to facilitate making responses online. A total of 701 representations were received to the Issues and Options Report, with 9 representations received to the interim Sustainability Appraisal. A summary of the main issues raised and

³ Cambridge City Council and South Cambridgeshire District Council (2008). North West Cambridge Area Action Plan. Self Assessment of Soundness and Statement of Consultation.

how these informed the development of the Preferred Options Report can be found in Appendix 1.

Preferred Options Consultation (Pre-Submission Public Participation Regulation 26)

Consultation on the Preferred Options Report and its associated draft final Sustainability Appraisal took place for a six-week period from the 22nd October to the 3rd December 2007. A number of public exhibitions were held to assist in engaging the public in the Area Action Plan process and again an interactive website was utilised to assist in accessing the documents and to facilitate making responses online. The Preferred Options Report consisted of two volumes, volume 1 taking the form of a draft plan and volume 2 setting out an audit trail demonstrating how the Councils had developed the preferred options, including consideration of the results of the Sustainability Appraisal. A total of 590 representations were received to the Preferred Options Report, as summarised in Appendix 1. Where appropriate, the AAP was amended as a result of this consultation.

The Preferred Options Report was subject to Sustainability Appraisal. Prior to the public consultation, the Sustainability Appraisal Consultants carried out an initial appraisal of the draft AAP in order to allow the Councils the opportunity to amend the draft plan where appropriate. This is detailed in Appendix 1 to this statement. At consultation, a total of 26 representations were made to the draft Final Sustainability Appraisal, of which 24 were objections. The majority of these objections related to the key issues identified and the findings of the appraisal. As the Sustainability Appraisal was carried out by independent consultants in order to inform the preparation of the draft AAP, it was felt that no changes should be made to the SA as a result of this consultation.

Submission Consultation

The Submission Draft AAP and the Final Sustainability Appraisal Report were submitted to the Secretary of State on the 19th May 2008, triggering a further six-week round of consultation that ran until the 30th June 2008. The Councils received 507 duly made representations to the Submission Draft Area Action Plan during the six-week period of consultation. Of these, 117 were in support of the plan and 390 were in objection to the plan. A summary of the representations received and a précis of the main issues was produced pursuant to Regulation 31(c) of the Town and Country Planning (Local Development) (England) Regulations 2004 and is available on the Councils' websites. An extract from this is included at Appendix 2.

The Submission Draft AAP was subject to a Sustainability Appraisal, which assessed the changes made to the AAP as a result of the Preferred Options consultation in order to assess the significance of the change. Any changes that were considered 'major' were compared against the findings of the Sustainability Appraisal of the Preferred Options Report in order to determine whether or not there was any change to the outcomes of the appraisal, including the cumulative impacts of the plan. Three of the proposed changes

were considered to be major and to affect the outcome of the plan, two relating to Policy NW7 (Balanced and Sustainable Communities) and one relating to Policy NW22 (Public Art). Changes to Policy NW7 were found to have positive impacts on the sustainability objectives, allowing for greater social integration. The change to Policy NW22 was felt to have a negative impact on the level of investment in key community services and infrastructure, although the appraisal did acknowledge that the proposed change was consistent with other planning policy guidance. The findings of the appraisal did not lead to any changes being made to the Submission Draft AAP.

The Final Sustainability Appraisal Report also considered two alternative site footprints that were put forward during the Preferred Options Consultation. In order to ensure that the footprints were fairly and adequately considered, they were assessed in the same way as all the other site footprint options. The Councils also carried out a final “health check” on the site footprint boundary in South Cambridgeshire, which increases the site area but retains a green foreground setting to Cambridge provided by the slope of land rising from the Washpit Brook. This has also been subject to Sustainability Appraisal as part of the Final Sustainability Appraisal Report.

In accordance with the Regulations, the Final Sustainability Appraisal Report was made available for consultation at the same time as the Submission draft AAP. A total of four representations were received to the Final Sustainability Appraisal Report, two of which were in support and two in objection to the AAP. All representations received to the Submission consultation were passed to the Independent Inspectors to be considered as part of the Examination process.

Informal Consultation on the Inspectors’ Larger Site Option

A further informal round of consultation was carried out at the request of the Inspectors who felt that there was a further site footprint option that should be considered in order to ensure that the AAP is ‘sound’. In order for this site to be properly considered by the Inspectors, it was subject to sustainability appraisal and public consultation, for a six-week period from 9th March – 20th April 2009. A total of 43 representations were received to the Inspectors’ Larger Site Option, with 9 representations received to the Sustainability Appraisal. All responses received were passed directly to the Inspectors in order to help inform their final decision.

4. Reasons for choosing the document as adopted in light of other reasonable alternatives.

The Environmental Assessment of Plans and Programmes Regulations 2004 (12) (2) requires environmental reports to examine reasonable alternatives, taking into account the objectives and the geographical scope of the plan or programme.

This statement is required to set out the reasons for choosing the plan or programme as adopted, in light of the other reasonable alternatives dealt with. PPS12 makes clear that full regard should be had to the chain of conformity to avoid duplication of assessment. The Issues and Options Report identified a range of options for each of the key issues on site for consultation, including site footprint. The scope for strategic choices in particular was limited by the specificity of policies in the former Regional Planning Guidance (RPG6) and the Cambridgeshire & Peterborough Structure Plan (2003). This limited the number of available reasonable alternatives, as non-conformity with the clearly established strategy in adopted higher order plans would make an alternative unreasonable. The Structure Plan was subject to Sustainability Appraisal.

As a result of the Issues and Options consultation, the outcome of the Interim Sustainability Appraisal and information contained in the various background documents that form the evidence base, the options were refined down to a preferred option. This process was documented in an audit trail, which was developed to highlight the reasons for choosing particular options and rejecting others. This audit trail was made available as part of the Preferred Options Consultation and was also updated in the preparation of the Submission Draft AAP, being made available as a background document to this consultation (as Appendix G of the Self Assessment of Soundness and Statement of Compliance).

The appraisal of alternatives is documented in the Final Sustainability Appraisal Report. Section 3.3 of the report considers the development of options, while section 3.4 sets out the appraisal of the preferred options, with further detail provided in Appendices I and V. The Final Sustainability Appraisal Report also considered two alternative site footprints that were put forward during the Preferred Options Consultation. In order to ensure that the footprints were fairly and adequately considered, they were assessed in the same way as all the other site footprint options, as outlined in table 3.7 and Appendix VII of the Final Sustainability Appraisal Report. Sustainability Appraisal involves testing each reasonable plan option against the SA Framework to determine their performance in sustainability terms. The process is fully documented, including the reasons for eliminating options.

Following Examination of the DPD, the binding Inspectors' Report states that "Alongside the preparation of the DPD it is evident that the Councils have carried out a parallel process of sustainability appraisal". With regards to the changes required by Inspectors in order to make the AAP 'sound', including the incorporation of the Inspectors' larger site footprint, the Inspectors conclude "This is a result of our consideration of further work carried out by the Councils at our request. This work included public consultation and sustainability appraisal. The remaining changes we recommend do not materially alter the substance of the overall plan and its policies, or undermine the sustainability appraisal and participatory processes".

5. Monitoring.

The Environmental Assessment of Plans and Programmes Regulations 2004 requires authorities to set out the measures that are to be taken to monitor the significant environmental effects of the implementation of the plan or programme.

Details of the monitoring measures envisaged are summarised in section 3.11 of the Final Sustainability Appraisal Report.

The indicators created in the Sustainability Appraisal Scoping Reports will continue to be monitored annually. Significant effects indicators, as suggested within section 3.11.6 of the Final Sustainability Appraisal Report, will be collated through the Councils' LDF Annual Monitoring Reports. These reports include an analysis of the implications of the results of monitoring, and should a need arise, a review of LDF documents could be triggered by this information.

The Councils' Annual Monitoring Reports are available to view on their respective websites.

Appendix 1: Extract from the Self Assessment of Soundness and Statement of Consultation (Regulation 28 Statement)

3. ISSUES AND OPTIONS CONSULTATION (REGULATION 25)

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

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

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

- 3.4 The Councils also set up an interactive website to assist access to the document and to facilitate making responses online. A total of 701 representations were received to the Issues and Options Consultation, with 70% of these being submitted via the interactive website. The breakdown of these representations is shown in the table below.

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

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

Site Footprint

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

Further Issues

3.7 Of the other representations made, the most significant number of representations relate to transport, the provision of a secondary school, and whether its playing fields should be located in the Strategic Gap, the provision of renewable energy and sustainable drainage. A summary of the main points raised in relation to these and how these were dealt with is provided in the table below. Further details of the way in which responses were dealt with in the drafting of the Preferred Options Report is provided in Volume 2 of the Submission Draft Area Action Plan and Appendix G of this statement.

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

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

OPTION	KEY ISSUES	PREFERRED APPROACH
	of the evidence & input from key stakeholders	
Option 13.4: Orbital route limited to cyclists & public transport designed with regard to slower speeds & safe crossings	<ul style="list-style-type: none"> • Failure to provide road capacity does not encourage use of other modes of transport by those for whom it is impractical; • This denies the benefits to other drivers of reducing congestion in the City; • Draft Transport Strategy concludes orbital link should cater for all modes of transport, although will need to mitigate the desire for rat-running 	Pursue Option 13.2
Option 13.5: Provision of north facing slip roads	<ul style="list-style-type: none"> • This would further exacerbate traffic problems; • This is not a sustainable approach to development; • There has never been any technical evidence to support this scheme; • Draft Transport Strategy shows the potential benefits of this scheme are negligible when compared to provision of an orbital link; • The need for such a scheme has not been demonstrated; • There are no plans to provide such slip roads; • The Council has a duty to support the provision of sustainable transport as a priority over the production of new road schemes 	Pursue option 13.6
Option 13.6: No new slip roads	<ul style="list-style-type: none"> • This would not enhance travel links from the South Cambridge area and Cambourne in particular 	Pursue option 13.6
Option 13.7: Cycle links	<ul style="list-style-type: none"> • Should include reference to linking cycle routes to all road links to ensure sustainable development; • Policy should state where the links are to (should explicitly state to Cambridge and all other large developments) • All cycle routes should be designated cycle paths (not shared-use) and designed to the highest Sustrans/DfT standards; • Needs to include reference to provision of secure and convenient residential cycle parking 	Pursue option 13.7
Option 14.3: University site suitable for a secondary school	<ul style="list-style-type: none"> • It would be at the very fringe of its catchment area; • Would consume too much land; • Concern about the absence of a justification in planning terms for locating a secondary school within the North West quadrant; • Emerging preference for a site between Huntingdon Road & Histon Road; • Development does not generate the need for a new secondary school 	Pursue option 14.4
Option 14.4: University site not a	<ul style="list-style-type: none"> • Concern about the absence of a justification in planning terms for locating a secondary school within the North West quadrant; 	Pursue option 14.4

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

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

Sustainability Appraisal

Interim Sustainability Appraisal Report

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

- 3.10 Both Cambridge City Council and South Cambridgeshire District Council have produced separate Scoping Reports⁴ for the SA of their Local Development Frameworks. For the purposes of the North West Cambridge Area Action Plan, it was decided to draw upon these and to identify specific sustainability issues relating to North West Cambridge by way of a Scoping Report Addendum.
- 3.11 The Scoping Report Addendum was sent out for consultation between the 21st August to the 19th September 2006. Consultation was carried out with the four SEA Consultation Bodies (the Environment Agency, Natural England, The Countryside Agency and English Heritage) and other key stakeholders. This consultation enabled these bodies to comment on the appropriateness of the objectives, indicators, baseline assessment and issues/problems. No changes were considered necessary as a result of this consultation.
- 3.12 The next stage of the SA process was to appraise the options presented in the Issues and Options Report. The role of the SA is to help inform the decision maker when developing the draft Area Action Plan on what tradeoffs are likely to be required and what the associated environmental, social and economic impacts are likely to be. To this end, the Issue and Options Report was appraised and reported in the interim Sustainability Appraisal Report prepared by Scott Wilson (2006). This document was made available for consultation at the same time as the Issues and Options Report.
- 3.13 A total of 9 representations were received to the interim Sustainability Appraisal, and these were mainly concerned with the process by which the Area Action Plan was carried out and the assumptions made by the appraisal. As the SA was carried out by independent consultants in order to inform the preparation of the draft Area Action Plan, it was felt that no changes should be made to the SA as a result of this consultation.

4. DEVELOPMENT OF PREFERRED OPTIONS

- 4.1 Following on from the Issues and Options Consultation, the Councils prepared the North West Cambridge Area Action Plan Preferred Options Report, which took the form of a draft Area Action Plan (Volume 1) and a document recording the development of the preferred options and the reasons for rejecting alternative options (Volume 2). Volume 1 also contained a Pre-Submission Proposals Map and a Housing Trajectory.
- 4.2 In drawing up the Preferred Options Report account was taken of national, regional and local policy, Issues and Options representations, the Sustainability Appraisal, local circumstances and the available

⁴ Cambridge Local Development Framework SA Scoping Report March 2005, South Cambridgeshire District Council SA Scoping Report, January 2006

evidence base. Drafting of the Report was also informed by the binding Inspectors' Reports into the South Cambridgeshire Local Development Framework, which have emphasised the need for conciseness and in the case of the Northstowe Area Action Plan, clarified the level of policy detail appropriate for an Area Action Plan for a large development.

5. PREFERRED OPTIONS CONSULTATION (REGULATION 26)

5.1 The Preferred Options Report was subject to Pre-Submission public participation from the 22nd October to the 3rd December 2007, and representations were invited either in support or objection to the policies set out in Volume 1.

5.2 As mentioned in paragraph 3.1 above, the bodies identified for consultation at the Issues and Options stage, subsequently became 'DPD Bodies' and, in accordance with the regulations, were sent all the relevant consultation documents, as outlined in the letter contained in Appendix D. In addition the public were advised of the consultation by press releases and formal public notices in the press and invited to comment on the policies contained in the draft Area Action Plan. Copies of the Area Action Plan were also sent to a number of public libraries. A copy of the notice of consultation is provided in Appendix E. The consultation documents, including the statement of the 'proposals matters', were made available in the following locations:

- Online at the City Council's website (www.cambridge.gov.uk) and at South Cambridgeshire District Council's website (www.scambs.gov.uk);
- At Cambridge City Council's Environment and Planning Reception and at South Cambridgeshire Hall, Cambourne during normal office hours; and
- At libraries in Cambridge City.

5.3 In addition, a summary leaflet was delivered to 10,342 households in the part of the City between Huntingdon Road and Madingley Road and in the villages of Coton, Girton and Histon/Impington. This leaflet provided the details of three exhibitions, which were held to assist in engaging the public in the Area Action Plan process, as outlined in the table below. These were manned by Officers of Cambridge City Council, South Cambridgeshire District Council and the County Council and outlined the key sections of the Area Action Plan.

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

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

8.30pm	Wilberforce Road, Cambridge
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5.4 An interactive website was set up in order to facilitate the submission of representations. A total of 590 representations were submitted and a breakdown of these is given in table 5 below. 80% of representations were submitted via the interactive website.

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

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

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

Table 6: Key Issues Raised During Preferred Options Consultation

Issue	Councils' Response
Site & Setting	
Objections from local residents that the Preferred Option is too limited and would result in over-development with higher densities which would adversely impact on residential amenity and the Ascension Parish Burial Ground - support therefore for the University's site footprint set out in Option 10.1.	Policy NW2 sets out a number of overarching development principles that will guide development, with the aim that development takes account of its surroundings, including existing buildings, open spaces and existing urban and village edges to ensure that development does not harm local amenity and where possible brings benefits to the area. Matters of detail will be dealt with in the Masterplanning and planning application stages. No changes to the AAP.
Lower densities and building heights with more green open spaces needed on edges of the development where it abuts existing properties	This is dealt with in the overarching development principles (NW2) that will guide development. It will be for the Masterplanning and planning application stages to take this forward in designing the development to achieve appropriate landscaping on the edge of development and to safeguard the amenity of existing properties. Masterplanning will also consider how best to protect the character of the existing features of interest including the Ascension Parish Burial Ground. No changes to the AAP.
The site footprint is insufficient to meet the needs set out in other policies within the AAP or the future	The Councils' have carried out a final 'health check' on the site boundary prior to submission, testing it against the plan's

<p>needs of the University, and would result in a poor and inefficient development configuration; the developable area identified is inadequate for 2,500 homes and student housing, research & development buildings and neighbourhood facilities</p>	<p>objectives. This has led to modest amendments being made to the site footprint boundary in South Cambridgeshire, which increases the site footprint whilst retaining a green foreground setting to Cambridge provided by the slope of land rising from the Washpit Brook. This allows for an increase in the developable area of 3.9 hectares, taking the total developable site area to approximately 73 hectares and the total housing capacity to 2,325 dwellings, which remains within the range sought by the University.</p> <p>Amend the site footprint of the Area Action Plan.</p>
<p>Support for the Strategic Gap but confusion over its purpose.</p>	<p>Amend the first sentence of paragraph 3.7 to provide clarification.</p>
<p>Housing</p>	
<p>Two storey houses should be provided adjacent to the site edges with 30 metre long gardens to provide wildlife sanctuaries and to respect local character and residential amenity.</p>	<p>Disagree that this should be the case as such an inflexible policy is not justified. Policy wording already states that development will be of an appropriate form and scale where it adjoins existing housing. The protection of amenity and character cannot only be achieved in the ways proposed and it is proper to allow future masterplanners and designers to have some flexibility in meeting this requirement.</p> <p>No change to the Area Action Plan.</p>
<p>Inclusion of words 'at least 50% affordable housing' is unsound and not supported by the evidence.</p>	<p>Agree that the Local Plan Inspector did agree that a 50% target for this site was appropriate having regard to the viability evidence. However the policy qualifies its reference to 50% affordable housing being provided by stating that account will be taken of costs and viability, it cannot therefore be termed inflexible.</p> <p>Amend the Area Action Plan by deleting the words 'at least'. Amend supporting text (para 4.6) to better reflect the Cambridge Local Plan Inspector's Report.</p>
<p>Concerns regarding affordable housing distribution in small groups or clusters and the proposal to locate student housing in a separate and distinct quarter as set out in Policy NW7.</p>	<p>Intermingling of affordable and market housing is standard planning practice and is supported by PPS3.</p> <p>Amend the Area Action Plan to clarify what is meant by small groups or clusters.</p> <p>With regards to student housing, agree that</p>

	<p>as over half the student housing would be for post-graduates who can have cars, the case for a separate student quarter is less convincing.</p> <p>Amend the Area Action Plan to reflect this.</p>
Employment	
<p>The split between academic uses and research is arbitrary, greater flexibility should be allowed in order to take full advantage of opportunities when they arise.</p>	<p>In order to plan positively for the future of the area more detail is needed on the likely mix of uses. In the absence of more detailed evidence this split has had the advantage of going through the Inquiry Process for the Cambridge Local Plan and maintains predominantly University-related uses in the employment uses on the site.</p> <p>A change has been made to the split in light of a recalculation of figures</p>
Transport	
<p>The link road will primarily be for access to the site but it will also offer an alternative access to the strategic road network.</p>	<p>The prime function of the road is to provide access to the development, with the proviso that this does not have adverse traffic impacts or effects upon amenity. The location and design of the route will take into account the factors raised in this objection (proximity to the strategic gap, SSSI etc)</p> <p>No change to the Area Action Plan.</p>
<p>A road will only be possible if impacts on amenities including the green/strategic gap and the historic environment are acceptable.</p>	<p>Agree that this is a key issue, paragraph 6.6 makes it clear that a road will only be possible if impacts on amenity are acceptable. These impacts would include minimising the effects upon green spaces and the historic environment through design, route location and landscaping as part of the Masterplanning process.</p> <p>No change to the Area Action Plan.</p>
<p>The design of new roads should give priority to public transport, pedestrians and cyclists.</p>	<p>The design of the new road, together with other policies in the AAP should give priority to public transport, cyclists and pedestrians.</p> <p>No change to the Area Action Plan.</p>
<p>Madingley Rise could provide access to development to the east of the site and will help to distribute traffic evenly to the local road network (through the University Observatories site on Madingley Road).</p>	<p>The intention is to minimise the number of access points consistent with the form of development proposed, but this does not prevent access through the University Observatories if this is justified.</p> <p>Amend wording of paragraph 6.5 to clarify this.</p>
Community Services and Facilities	
<p>No reference to need for health care</p>	<p>Agree that there should be reference to</p>

facilities.	healthcare provision in the AAP. Amend wording of paragraph 7.9.
1% contribution to public art should be a target, not a minimum requirement as this could have significant impact on viability.	Agree that this policy should be consistent with other planning policy guidance and seek a cost equal to 1% of the construction cost of the development. Amend Policy NW22 to reflect this.
Natural Resources	
Levels are far from a high degree of sustainability. Code level 5 should be the absolute minimum for residential.	This would not be consistent with national policy, which states that such policies should have regard to viability of the development and the delivery of affordable housing. Code Level 4 represents a 44% improvement in energy/carbon performance than part L of Building Regulations. Of the 2,250 dwellings proposed, 1,700 will be brought forward at a minimum of Code Level 5. No change to the Area Action Plan.
An approach that delivers Code level 4 up to 2016 and Code level 6 beyond 2016 would provide a more realistic delivery path.	The Councils' approach is consistent with National and Regional Planning Policy. If CHP is found to be viable at this site this will result in considerable carbon emission reduction and assist in meeting the specified Code levels. No change to the Area Action Plan.
There is a need for greater clarity and certainty in the proposed approach, particularly clarification of the relationship between Policy Options NW24 and NW29.	Amend the Area Action Plan to combine policies NW24, NW25 and NW29 in order to ensure clarity.
Policies should reflect recent development in strategic management of water resources and the Catchment Wide Studies now being developed by the Environment Agency.	Level of detail required is too detailed for the Area Action Plan, which is intended to give a strategic overview to development. This level of detail will need to be included in the Flood Risk Assessment, which will be submitted with the outline planning application and will be subject to consultation with the Environment Agency. No change to the Area Action Plan.
Recent survey work on the 350m culvert carrying the Award Drain beneath the B1049 in Histon and Impington has amplified grave concerns over flood risk and structural soundness.	Level of detail required is too detailed for the Area Action Plan, which is intended to give a strategic overview to development. This level of detail will need to be included in the Flood Risk Assessment, which will be submitted with the outline planning application and will be subject to consultation with the Environment Agency.

	No change to the Area Action Plan.
Delivery	
Construction waste must not be placed in mounds or beams near the boundary where it will diminish the amenity of neighbouring houses or in such a way as to create surface water or sub surface runoff from the site.	Amend part b of Policy NW30 to provide more clarity with regards to local urban character and landscape character.
The University has already demonstrated its needs case for residential housing provision and student housing.	In accordance with Structure Plan policy P9/2c, land should be released from the Green Belt for predominantly University related uses and only brought forward when the University show a clear need for land to be released. Housing is not the only element of the site and due to the site's close proximity to the West Cambridge site, it is important that as development comes forward, the University can satisfactorily demonstrate the need for the development and that it cannot reasonably be met elsewhere. A needs statement will be required. No change to the Area Action Plan.

Sustainability Appraisal

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

Table 7: Sustainability Appraisal Recommendations and Councils' Response

Preferred Policy Option Reference Number	Sustainability Appraisal Recommendations	Councils' Response	Policy amended?

NW2	The main area for change is in strengthening some of the principles already in place, and adding slight amendments to other Development Principles:		
	Long-term protection of the Green Belt should be included	Disagree. This is covered by national planning guidance.	No
	The biodiversity of the site needs to be appraised as soon as possible.	Noted	No
	Principle 3 or 4 should be amended to include light and light pollution	Already covered by NW2 part 3 (k, l and n) and paragraph 2.8 although NW2 part 4 has been strengthened to include a specific reference to lighting.	Yes
	Principle 2 (j) should be amended to "Provide integrated refuse and recycling facilities <i>and reduce the amount of waste produced through good design.</i> "	Agree.	Yes
	Principle 2 (f) should be amended to say "Enhance and protect the biodiversity..."	Agree in principle.	Yes although recommended wording not used.
	Principle 3 (n) should be amended to say "On biodiversity, protected species, archaeological..."	Disagree. Planning permission will not be granted where the proposed development or associated mitigation measures would have an unacceptable adverse impact on biodiversity etc. Biodiversity is an all-embracing term therefore any adverse impact on protected species would be considered as the policy stands.	No
NW4	Policy should be reworded to read: "to ensure separation is maintained between Cambridge and Girton village and to provide a central open space for biodiversity, landscape,	Agree in principle.	Yes although recommended wording not used.

	recreation and amenity, whilst ensuring a cohesive and sustainable form of development.		
NW7	Background paragraph 4.9 should be amended to clarify the University's position on 'car free', and in particular their policy for this site.	Disagree as this is adequately covered in paragraph 6.21.	No
NW9	Local employees accessing their place of work by sustainable means of transport is of strategic importance.	Noted.	No
NW11	The Policy as it stands sets a high level of modal split. This should, dependant on implementation be set at a higher level and this should be considered this is with particular reference to the 37% modal split highlighted in the supporting text.	This is to allow for consistency with the Cambridge East Area Action Plan and allow for any over estimate of the potential modal split.	No
NW12	Car free should apply to the market housing and University buildings in addition to the 'essentially car free' University accommodation. This is recommended as the most sustainable option.	Noted. The policy advocates reducing the need to travel as much as possible but in this out of centre location it cannot be 100% car free.	No
	Traffic assessments may be necessary as part of the development proposal must include consideration of whether the scheme could induce new traffic movements.	Noted. The transport assessment would take this into consideration and therefore it does not need to be covered in the policy.	No
NW13	It will be at the detail level that it will be possible to gauge the true level and type of impact on landscape character, and furthermore to ascertain the impacts of light, noise and air pollution. Therefore any application should consider Landscape Impacts as part of its scope	Noted. Policy NW2 covers such general principles.	No
NW19	The policy should be expanded to promote car free development for all of the land uses designated on the site. This is recommended as the most sustainable option.	Noted. Policy NW11 advocates reducing the need to travel as much as possible but in this out of centre location it	No

		cannot be 100% car free.	
NW20	Part 1 of the policy has no mention of ensuring high quality services and facilities. Suggest rewording thus: “The development will provide an appropriate high quality level and type of services and facilities in suitable locations ...”	Agree in principle.	Yes although recommended wording not used.
NW21	Part 2 of the Policy should be reworded to make clearer what it is hoping to achieve. Suggest the addition of an e.g.: “Where appropriate, those services and facilities delivered by the community or voluntary sector (e.g. faith facilities) will be provided through...”	Agree in principle.	Yes although recommended wording not used.
	There were no negative impacts identified by the assessment. One recommendation is that, although the Policy promotes public transport access, it will be important to ensure that this enables access to the centre for all elements of the community. This should be mitigated through NW2 (1 (b)).	Noted.	No
NW22	Most detailed mitigation for this policy should be implemented through the Masterplan. Recommend that the policy or policy background include integration of public engagement requirements.	Agree.	Yes – supporting text amended.
NW23	The supporting text paragraph 8.1 should be amended to, “many open space uses are not mutually exclusive”.	Agree.	Yes
NW24	The policy background text should be amended to promote a strategic approach to locating all open and green space encouraging the use of pedestrian and cycle routes	Noted.	No
	The policy should be rephrased to ensure the highest possible standards are aspired to, unless it can be proven that they are not reasonable for technological, economical or environmental reasons.	Agree.	Yes

NW25	There should be a clearer distinction between the CSH and BREEAM standards. CSH applies to residential development, taking over from EcoHomes whereas BREEAM will apply to all other developments. This split needs to be distinct and clear.	Agree.	Yes
	To avoid confusion between climate change mitigation (reduction in CO ₂) and adaptation (flood defences) the last sentence of paragraph 9.1. should be amended to read: <i>“North West Cambridge will need to play its part in helping to reach this goal, balancing the overall increased emissions due to the scale of the development, with the opportunities that new development offers for reducing carbon emissions, through such measures as sustainable design and the provision of decentralised and renewable energy sources.”</i>	Agree.	Yes
	The supporting text makes an important link between adapting to future increased temperatures, but at the same time reducing emissions, therefore also acting to mitigate climate change. However, it is thought that ‘air conditioning’ or ‘active cooling systems’ could be substituted for ‘active heating and cooling systems’, in order to add to clarity.	Disagree as the supporting text refers only to climate change and both heating and cooling systems contribute to this.	No
	This Policy refers to sustainable design, but could also be used to promote sustainable construction. Amend Part B to read “... <i>sustainable design and construction in line with...</i> ”	Agree.	Yes
	The compatibility with the requirements for levels of the CSH needs to be checked. Also, as with the previous Policy, a clear distinction between residential and other uses, and their respective requirements needs to be made.	Disagree as this sets a minimum standard for the development as a whole.	No

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

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

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

5.7 Consultation on the Sustainability Appraisal was carried out for six-weeks at the same time as consultation on the Preferred Options Report. A total of 26 representations were received to the Sustainability Appraisal, 2 in Support and 24 in Objection. The majority of these objections were in relation to the key issues identified and the

findings of the Sustainability Appraisal. As the Sustainability Appraisal was carried out by independent consultants in order to inform the preparation of the draft Area Action Plan, it was felt that no changes should be made to the SA as a result of this consultation.

Appropriate Assessment

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

6. SUBMISSION DRAFT AREA ACTION PLAN (REGULATION 28)

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

June 2008. The Submission Draft Area Action Plan identifies land to be released from the Green Belt in order to contribute towards meeting the needs of the University of Cambridge. It also identifies land to be returned to the Cambridge Green Belt to the North of Madingley Road and land to provide green separation between Cambridge and Girton. It establishes an overall vision and objectives to achieve this and sets out policies and proposals to guide the development as a whole, along with a Proposals Map and the Housing Trajectory.

Sustainability Appraisal

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

Appropriate Assessment

- 6.6 As mentioned in paragraphs 5.8 – 5.10 above, the Preferred Options Report has been subject to an Appropriate Assessment Scoping Report, the conclusion of which was that the Area Action Plan was unlikely to have significant impacts upon the European Sites located within and in the vicinity of South Cambridgeshire District and Cambridge City, and that an Appropriate Assessment would therefore not be required. It is not felt that the changes that have been made in the preparation of the Submission Draft Area Action Plan are sufficient enough to have an impact on the findings of the original Appropriate Assessment.

Appendix 2: Extract from the Precis of Issues and Summary of Representations Received to the Submission Draft AAP.

SUMMARY OF THE MAIN ISSUES RAISED

PREFACE

- The Councils did not adequately consult with individual residents adjoining and adjacent to the North West Cambridge site (or residents associations).
- Insufficient weight has been given to the North West Cambridge Area Action Plan Green Belt Landscape Study.
- Rapid changes in our understanding of climate change, problems of food production and problems of flooding makes these plans seem rash in the extreme.

CHAPTER 1: INTRODUCTION

- The Sustainability Appraisal has not discussed in any significant way the social impact of the proposed development on adjoining and adjacent properties around the site.
- The authors of the draft Sustainability Appraisal have not directly consulted with residents adjoining and adjacent to the North West Cambridge site (or residents associations).
- The Councils did not consult directly with individual residents adjoining and adjacent to the North West Site (or residents associations).

CHAPTER 2: VISION, OBJECTIVES AND DEVELOPMENT PRINCIPLES

- The Submission Draft AAP will greatly diminish the amenity of existing adjoining residents and produce an unsustainable site.
- The development must not harm local amenity and the only way to ensure that this is achieved is through timely and frequent consultation with local residents and residents groups.
- Not aware of the University having demonstrated any need beyond that for a certain amount of new affordable housing for its staff. The University's claims should be carefully and sceptically scrutinised.
- It is not possible to protect the historic landscape, biodiversity, limit light pollution and protect the Travellers Rest SSSI without deciding not to build at all. Do not allow planning permission on this site.
- The AAP should make provision for a minimum of 2,500 dwellings.
- The provision of 2,500 dwellings is excessive and conflicts with the policy framework for release of the site from the Green Belt and detracts from the emphasis on University-related provision.
- Would question whether there is a need for more hotel and conference facilities.

- Recent initial studies have indicated that land surrounding the SSSI has geological features of special note. These features must be protected, maintained in a favourable condition and suitably managed.
- Need to address wider setting matters such as long distance views.
- Noise from the M11 and A14 is a very substantial issue and no mitigation measures should be excluded at this stage before the announced studies have been examined.

Policy NW1: Vision

- Need to include health centre and religious worship facilities otherwise unacceptably high levels of car usage will be generated.
- In the present climate the vision should explicitly include a zero carbon, zero waste development.
- The thinking over the revised Green Belt is incoherent and self-contradictory.
- The policy should also address the need for the built environment to respect, and respond to, the character of Cambridge. Building heights and layouts will be particularly important.

Objectives of the Area Action Plan

- The importance of protecting the character and setting of the historic city should be included in the objectives.

Objective B

- Huntingdon Road (south side) and Storeys Way (north section) form a very successful and supportive 'village' whose atmosphere must not be damaged by the development.

Objective D

- I have never heard of, or participated in, a study made by the University to assess the need for affordable housing for University and College staff. There is a need to demonstrate need for 'key worker' housing in terms of volume and to define the term in relation to the various grades of university and college staff.

Objective F

- Revise objective to read "To secure high quality development of built form, open spaces and natural green space".

Objective G

- The word 'communities' implies the wider areas of this and other sites, and not specifically to existing adjoining residences (and land between Huntingdon Road and Histon Road).
- The objectives do not contain anything that safeguards the interests of the residents adjoining and adjacent to the site in terms of ensuring development that respects and promotes their amenity and is of a scale and character that is appropriate to this sensitive site. The words 'adjoining communities' are not sufficient.

Objective H

- A lack of facilities and high proportion of family units make the 40% modal split figure unrealistic.

- It is unsustainable to have as much as 40% of trips made by car both on and off the North West Cambridge site.
- Should be replaced by explicit mention of the Government's Manual for Streets and its hierarchy of users.
- Figure of 40% needs justification and an explanation of how the proposed policies would meet it.

Objective I

- No amount of euphemistic language can disguise the fact that the proposed development conflicts head-on with the purposes of the Green Belt.
- Remove the Green Belt designation for the area south of Nineteen Acre Field as it fulfils none of the purposes of the Green Belt.

Objective K

- The plan fails to achieve adequate separation between Girton and Cambridge. A clear statement is required as to the status of the north-west segment of the development and Girton.

Objective L

- Need to add detail of standards and include effects on communities elsewhere in Cambridge.

Objective N

- Consequences for other communities in Cambridge should be taken into account when considering phasing for example community provision on new sites.

Objective P

- It is impossible to see how this can be done. Protecting wildlife is incompatible with development of this size and what does securing a net increase in biodiversity mean?
- Needs to be revised to make specific reference to the SSSI and special geological interest.

Policy NW2: Development Principles

Principle 1

- It should be expressly stated in the plan that the site will be planned and developed in a way that protects the legitimate interests of residents adjoining or adjacent to the site by protecting their amenity and the character and setting of their residences.

Principle 1 a)

- The word 'communities' relates to a wide area and does not specifically include adjoining residences or the Ascension Burial Ground. Add a new development principle "To safeguard the character, setting and amenity of adjoining and adjacent residences, and of the Ascension Parish Burial Ground".

Principle 1 b)

- Need to specify what is meant by "high level of design quality"

Principle 1 e)

- Need to clarify precisely the standards to be met and the means for mitigating the noise impact of the M11 and A14.

Principles 2 f)

- Need to make specific reference to the SSSI and surrounding area and geodiversity of the area.

Principle 2 i)

- Various proposals for maximum permeability from the site for cycles and pedestrians disregard the impact that this excessive and unnecessary accessibility has in increasing the opportunities for crime via the back gardens or adjoining and adjacent houses along Huntingdon Road and All Souls Lane.

Principle 2 j)

- While this principle is supported it is difficult to see how it would be achieved. There is a rather low limit on the percentage that can be recycled with current manufacturing practices.

Principle 3

- With regards to ‘unacceptable adverse impact’, unless the test of this impact is objective it will be simple for the Council to brush aside criticism without proper consideration in an objective way
- A development of this size will cause an increase in light pollution for the surrounding residential and wider community, particularly on the operations of the Institute of Astronomy Observatory. The Plan must protect the community from unacceptable impact in this respect.

Principle 3 k)

- The Councils proposals will lead to development of a site that is too small and too dense and which degrades the amenity of existing adjoining properties.
- The Councils should be required to consult with residents adjoining the site continuously during all phases of development of the site.
- Concerned that residential amenity will be so broadly interpreted that unacceptable impacts on adjoining properties will be considered to be outweighed by some generalised benefit for example new community facilities.
- Existing historic and visually attractive neighbourhoods should not be carved up to provide maximum permeability to the site. Properties should not be subject to Compulsory Purchase to enable this.

Principle 3 n)

- There is no reference to the protection of existing wildlife corridors and habitats.
- Remain concerned that the historic environment is not acknowledged in the AAP as a key issue.

Principle 3 o)

- The water table is very high in this part of Cambridge and building on a high water table may push underground water elsewhere.
- Need to consider the impact on surrounding communities.
- The water courses in this area are already above capacity and any increase in flood risk would be adverse.

Principle 3 p)

- This principle is supported but there is a need to consider the impact on existing communities.

Principle 3 q)

- The term “local” needs definition
- Any increase in traffic is adverse. If the impact were proved to be adverse would planning permission be withdrawn or permission for subsequent stages be withheld?

Principle 3 r)

- The Ascension Burial Ground is in the Storeys Way Conservation Area and should be acknowledged in this principle.

Principle 3 s)

- Changes to the site could adversely effect mature trees through root disturbance for those on the boundaries and possibly less water supplies for them all.

Principle 4

- A development of this size will cause an increase in light pollution for the surrounding residential and wider community, particularly on the operations of the Institute of Astronomy Observatory.
- It is not just the exposure of the development to these forms of pollution that needs to be considered but of those living close to the proposed development.

Policy NW3: Implementing the Area Action Plan

- The Councils should be required to consult with residents adjoining the site continuously throughout all phases of development of the site and prior to the creation of drafts for general consultation.
- Add a further part to this section to refer to the wider historic character of the City.

Figure 2.1: Concept Diagram

- The AAP should make provision for a secondary vehicular access from Madingley Road via Madingley Rise to ensure that the Plan’s policies and proposals are deliverable and that the AAP is sound.
- Land at Madingley Road does not perform the functions of the Cambridge Green Belt and should not be allocated as Green Belt in the AAP. It should be allocated as Open Countryside in recognition of the

need to retain flexibility over the use of the land through the life of the AAP.

- A long stagger is the preferred vehicular access strategy to both sites along Huntingdon Road and as such B2 should be removed from the concept diagram.
- Object to the current boundaries of the indicative built environment in the vicinity of the SSSI due to impacts on the special features of the Traveller's Rest Pit.

CHAPTER 3: SITE AND SETTING

- Strong support for the strategic gap, however a minimum size for the gap should be stated to prevent a "token" gap.
- Would like to see the role that the Green Belt has in protecting the geological interests of the site highlighted.
- The Green Belt boundary facing the M11 does not need to be designated as Green Belt to protect the setting of the development as this can be achieved through other measures.
- A minimum size for the strategic gap should be stated.
- The green corridor proposed to be designated as Green Belt does not serve any purpose of the Cambridge Green Belt and would be harmful to creating a cohesive urban extension to Cambridge.
- The language leaves unclear the relationship between the north-west segment (in the Parish of Girton) and Girton village.

Policy NW4: Site and Setting

- The development site would not deliver the Plan's developments proposals.
- The development boundary is not based on a consistent evaluation process and does not consider masterplanning principles and is not based upon up-to-date information.
- Land designated as Green Belt does not serve a Green Belt function.
- Part of the Green Belt boundary is not defined by readily recognisable features in the landscape. Designation of the development footprint as the Green Belt boundary does not enable sufficient flexibility to bring forward a sustainable development through masterplan refinement.
- The north western half of the two part development area (North West of the proposed open space) being directly adjacent to Huntingdon Road will make Girton a suburb of Cambridge, rather than a distinct village. This is against the purpose of the Cambridge Green Belt.
- The location of the proposed development is within 3 miles of another major development at Northstowe and is located at the intersection of the M11 and A14. This will place an undue burden on the road infrastructure in this area.
- We support the University's request for a larger site. We believe that a 73 hectare site is too small to meet the University of Cambridge's proposed needs and will lead to a site that is too dense and is unsustainable. A larger site would allow the University to honour its

commitment to adjoining resident's of Huntingdon Road and All Souls Lane to keep the density along the borders of the site low.

- The proposed Northern half of the development is separated from the village of Girton by only the Huntingdon Rd extending Girton directly into Cambridge with no separation, which is against the purpose of the Cambridge Green Belt. By moving the development southwards towards the M11, an open space between the development and Girton could be maintained whilst occupying the same footprint. The current plan protects the view of Cambridge from the M11, at the expense of turning Girton into a suburb. With Northstowe being developed so to Girton close the plan will extend Cambridge as a sprawl Northwards.
- The site footprint should pay less attention to the fleeting view of the site fringe from the M11.
- Masterplanning of the site needs to be sensitive to the Green Belt characteristics of the area and have regard to the sensitive nature of the Green Belt location. Development should therefore be targeted to the eastern part of the site within Cambridge City in the first instance.
- Strategic gap appears to provide for reduced opportunities for accessibility, biodiversity and landscape and creates poor separation between Girton and Cambridge.
- Need a greater degree of separation between Cambridge and Girton.
- Land at Madingley Road does not perform the functions of the Cambridge Green Belt and should not be allocated as Green Belt in the AAP. It should be allocated as Open Countryside in recognition of the need to retain flexibility over the use of the land through the life of the AAP.

CHAPTER 4: HOUSING

- At masterplanning workshops held in 2005, the University agreed with local residents that houses bordering their properties would be two-storeys with peaked roofs and with 30 metre gardens to augment the wildlife sanctuaries in our gardens. The wildlife from these sanctuaries would permeate the site at a time when on-site landscaping would be immature.
- Existing properties and amenity must not be adversely affected.

Policy NW5: Housing Supply

- The need for a substantial amount of affordable housing for University staff has been demonstrated. Reference to 2,000 – 2,500 dwellings should be deleted as it has been demonstrated that the site can accommodate 2,500 dwellings and that development viability is more secure with this number of dwellings.
- The proposed net density should be reduced to the maximum of 30dph as required by the Structure Plan (2003).
- The simultaneous development of the NIAB site and an overly dense North West Cambridge site will place excessive strain on scarce water

resources and other infrastructure needs in this area in the context of a difficult economic environment.

- Density and height restrictions should be placed on properties close to the boundaries of existing residential areas.
- At the University's masterplanning workshops in 2005, it was agreed that on the boundaries of our properties there would be two storey houses with peaked roofs and 30 metre gardens which would protect and augment the wildlife sanctuaries in these gardens and All Souls Burial Ground. A site that is dense in its boundaries, would destroy wildlife on its edges.
- The University's requirements cannot be met within the site as currently defined. In order to accommodate other uses on the site, the number of dwellings will therefore need to be reduced.
- It is important that the number of dwelling units is not fixed absolutely before the implications of the development are understood. The protection of the setting of Cambridge should be taken as a guiding principle.
- Provision of 2,500 dwellings is excessive. This conflicts with policy framework for release of land from the Green Belt and detracts from emphasis on University-related provision. Excessive density will worsen the danger of coalescence.
- PPS3 sets out a requirement for a more responsive approach to housing land supply, which is lost in the test of the AAP.
- Do not accept that the housing is deliverable in the expected timescales (particularly the 200 dwellings in 2011/2012).
- The University is yet to demonstrate a need for the release of land to meet its needs. The AAP should include a trigger requiring that need be demonstrated prior to releasing land for development (this should also preclude the grant of outline permissions)

Policy NW6: Affordable Housing

- Remove any mention of including open market housing for this site and make it 100% affordable housing for sole use of the University.
- As currently worded, the policy suggests that in view of competing demands for funding, provision below 50% may be considered. In view of the scale of identified need, this should be framed so as to set the realisation of a higher proportion as a clear objective.
- There are some concerns over the inclusive nature of the policy.

Policy NW7: Balanced and Sustainable Communities

- Houses bordering the existing residential areas should be two-storeys with peaked roofs and with 30 metre gardens. These should be market housing or affordable housing for key University staff. Student housing should be situated away from the boundaries.
- Object to the proposals to distribute affordable housing in small groups or clusters as normal objectives for mixing affordable housing and market housing are not relevant here.

- It is not possible to ensure that student housing will be provided in each individual phase of the development in small clusters as this approach would not provide suitable development sites for such accommodation and would have implications for delivery.
- Wording in relation to Lifetime Homes does not give a sufficiently firm impression about the level of provision.
- Housing mix needs to be sensitive to the nature of existing communities.

CHAPTER 6: TRAVEL

- The need to travel outside of the development cannot be achieved for many reasons. A high proportion of the University personnel living there will have a constant need to visit College, other departments etc.
- Madingley Road Park and Ride needs to become a major coach transfer station for Cambridge coach routes west and north.
- Strongly object to the possible adoption of signalised crossroads on Huntingdon Road. This would require the compulsory purchase of properties on the south side of Huntingdon Road and would fragment existing historic communities. New road construction should protect the amenity of existing adjoining properties at all times.
- Impacts on local residents must be reasonable.
- Cycle and pedestrian access to the site from Huntingdon Road should be limited to the three existing access points. Inbound cycle traffic should be directed towards Madingley Road. Walkers to inbound buses should be directed away from Madingley Road and the NIAB site and towards buses at the local centre and on Madingley Road. Cycle traffic and pedestrians should not be channelled into the Ascension Burial Ground or All Souls Lane. Existing adjoining and adjacent houses should not be purchased and demolished to provide cycle access, pedestrian access or construction access.
- Cycle routes should also be 'high quality' planned in accordance with the Manual for Streets.
- Concern over overspill car parking in adjoining communities.
- Secondary access through the Observatories would bisect the Bullard Laboratories and BP Institute, with severe environmental and safety consequences due to position of having roads crossing the strategic gap only once. This restriction should be re-examined.
- The AAP should refer to access through Madingley Rise and not through the University Observatories.
- High quality public transport needs to be defined.
- Concern of re-routing of bus services away from existing routes and into the North West site.
- The grid system of paths should be designed such that it can be used by both cyclists and walkers as a "shared space". No "cycling chicanes" should be used anywhere on the site. Where pedestrian and cycle routes are separated, both should always be running in parallel such that there is no preference of pedestrians over cyclists or vice versa.

Policy NW11: Sustainable Travel

- The 40% modal split is unachievable and impossible to monitor and enforce.
- Concern that this could have a detrimental effect in existing and future residents in terms of public transport and overspill car parking.
- This should include explicit mention to the Governments 'Manual for Streets' and its hierarchy of users.

Policy NW12: Highway Infrastructure

- There is currently insufficient highway capacity at peak times thus any increase in motor traffic will make a bad situation even worse. The 'significant' diverse traffic impacts must be objectively considered.
- The improvement of the M11 junction at Madingley Road is essential and should be explicitly included in this policy.

Policy NW13: Vehicular Access

- Huntingdon Road is already inadequate for current demand. No indication is given of how traffic will interface with that of other developments.
- No argument is put forward for the restriction of access from Storey's Way being only for private motor vehicles.

Policy NW14: Madingley Road to Huntingdon Road Link

- Concerned that the route will lead to an outer orbital route for Cambridge, which will foster only orbital movements served primarily by car rather than radial movements by public transport.
- Seems to be a lack of joined-up thinking about access routes through this site (and NIAB) and how they will be connected.

Policy NW16: Public Transport Provision

- There is not to be missed an opportunity to improve bus services throughout a large sector by developing a segregated busway west of Cambridge.
- No reference is made to the effect of the TIF bid on public transport and how these plans will integrate with it.
- There are no clear mechanisms for enhancing bus services through the development other than through infrastructure provision, which is already dealt with in the policy. The AAP is not sound if the development is required to deliver operational, service or other enhancements to bus services.

Policy NW17: Cycling Provision

- The road and cycle track at the south end of Huntingdon Road all the way down to Senate House is dangerously congested at term time as it is. It may well be impossible to cater safely for additional cyclists unless vehicular traffic is curtailed in the congested areas.
- Cycle access should be limited to three points and inbound traffic directed away from Huntingdon Road and the NIAB site towards Madingley Road. No properties should be demolished in order to encroach on the graveyard or All Souls Lane.
- Plan gives no indication of how conflict with buses can be avoided and how proper south-bound cycle facilities can have priority.

Policy NW18: Walking Provision

- Some of the information about walking distances in the Transport Study appears to be seriously misleading.
- Need to define what is meant by adjacent communities.
- Walking access to the site from Huntingdon Road should be limited to three existing routes on Huntingdon Road and pedestrians intending to catch buses into the City centre should be directed away from Huntingdon Road and the NIAB site and towards buses at the local centre and on Madingley Road. Walkers should not be channelled into the Ascension Burial Ground or All Souls Lane. Adjoining and adjacent houses should not be purchased and/or demolished in whole or in part to provide walking access to the site.

Policy NW19: Parking Standards

- No indication is given as to how visitor access is to be controlled to ensure that the number of visitor cars does not exceed the parking provision.
- Additional measures are needed to ensure that inadequate parking provision does not drive motorists to use footways, roads and possible land for parking.
- Reliance on proctorial control of student motor vehicles is inappropriate as well as ineffective.

CHAPTER 7: COMMUNITY SERVICES & FACILITIES

- The County Councils preferred for locating a Local Recycling Centre to serve the northern sector of Cambridge is within the Cambridge Northern Fringe east. If this option is found to be untenable, then an alternative option will have to be pursued, and this is likely to be the North West site. The AAP should make reference to the possible need for this Recycling Centre.
- The site will require primary provision for a least 3 forms of entry (FE) to cater for the highest levels of development. To deliver this provision the County Council would be seeking a second primary school at North

West Cambridge, initially on a site for 1FE, but with the capacity to expand if demand for further places emerged.

- Cambourne is a perfect example of how very wrong a development can go and what a lasting and adverse impact is created for the entire community when community services and facilities are not in place at the outset.
- Health services and facilities for religious worship must be included in the range of services provided.
- Services and facilities should be available before occupation of either the proposed NIAB site or the proposed University site to prevent overload of limited services and facilities in the area between Huntingdon Road and Histon Road.

NW21: A Local Centre

- There is a need to state explicitly that these facilities, which will be shared with those living to the north of Huntingdon Road, should be within reasonable walking distances of those communities.

CHAPTER 8: RECREATION

- Sport and recreational facilities for disabled residents must be provided and the entire open space planned to ensure no nuisance to or abuse of existing local residents.

NW23: Open Space and Recreation Provision

- The ability to meet the standards for open space and recreation are questioned given the size of the green corridor. Whilst it may be able to accommodate recreational facilities, biodiversity and landscape may be compromised.
- Policy also needs to refer to the provision of sufficient natural green space in accordance with Accessible Natural Greenspace Standards (ANGST).

CHAPTER 9: NATURAL RESOURCES

- Wind turbines should be deleted as an option. There is no clear space for such structures and they have been proven to be cost ineffective. The adverse impact on the new as well as existing local residents is totally unacceptable.
- Wish to ensure that following any appraisal of sewerage provision, no foul water drainage from the North West Cambridge site will be directed towards Uttons Drove, which is presently working at capacity.
- A renewably fuelled CHP is, ultimately, likely to be the most sustainable solution when there is significant year-round thermal demand of suitable large scale, as development across the site is at or nearing completion. Until then, renewably fuelled district heating, or gas CHP are more feasible options.

- Government policy in the PPS1 addendum consistently refers to 'renewable or low carbon energy sources'. In some cases heat from fossil fuel CHP can deliver more carbon savings than heat pumps or even biomass boilers and a lower cost and therefore should be included in this section (Air Source Heat Pumps and Fossil Fuel Fired CHP).
- While we entirely support the goal of reducing water consumption we are concerned at the possibility of these figures being used to drive an inadequate waste and drainage strategy.

Policy NW24: Climate Change and Sustainable Design and Construction

- A very close watch will be needed to prevent unacceptably high levels of water in the locality.
- Goals need clarifying and implementation mechanisms identifying.
- There will be insufficient year-round thermal demand to support CHP until a substantial amount of academic research space is built. There is no evidence that the Code for Sustainable Homes Level 5 will be deliverable by April 2013.
- The Councils have not justified the specified Code Levels in terms of an appropriate evidence base. Such an approach is inconsistent with national planning policy.
- The plan should specify that the decentralised energy is indeed from renewable sources, and provides all the needs of a minimal proportion of the development (around 75% is too vague).
- These levels are far from a high degree of sustainability. Code Level 5 should be the absolute minimum and there should be demand for zero carbon buildings from the outset.
- Policy needs to make reference to adverse impacts on Geodiversity.

Policy NW25: Surface Water Drainage

- Considerable surface water drainage already exists from the site into gardens and basements in properties along Huntingdon Road and construction on site will greatly increase run off and sub-surface seepage from the site towards Huntingdon Road.
- A very close watch will be needed to prevent unacceptably high levels of water in the locality.
- Currently the Strategic Flood Risk Assessment carried out for the Council is using a non-verified model of the river (i.e. not verified by the Environment Agency).
- The policy states that the surface water drainage should be designed "as far as possible as a [SuDS] to reduce overall run-off". This might be insufficient to protect existing adjacent properties including those on Huntingdon Road. The wording needs to be tightened to ensure there is no increase in run-off leaving the site in the direction of those properties.
- SuDS is little more than a idea and certainly not a proven technology.

- The policy is insufficiently robust and does not make it clear that flood risk may be increased at some distance from the site due to development.

Policy NW26: Foul Drainage and Sewage Disposal

- The need to consider the effects on Cambridge City and Cambridgeshire must be strengthened.
- This is an additional 7,900 dwellings over the previous indications. The current strategy under consideration by Anglian Water Services only allows for 2,500 dwellings in this area and cannot accommodate any further numbers (in terms of the effect on the wastewater sewerage system).

Policy NW27: Management and Maintenance of Surface Water Drainage Systems

- The Council is concerned that the major problems begin when the water leaves the site and obligations should be built in concerning the history of the water at least as far as the Cottenham Lode, preferably all the way to the Ouse.

CHAPTER 10: DELIVERY

- Construction spoil should not be placed along the boundary of the site where it would create mounds that would diminish the amenity of existing adjoining and adjacent properties.
- Construction spoil should not be placed on the site in a position that leads to surface run-off or sub-surface seepage from the site into the gardens and houses of existing and adjoining and adjacent properties on Huntingdon Road and in All Souls Lane and into the Ascension Parish Burial Ground.
- It should be built into the requirements that Parish Councils will be involved at all stages of the delivery planning process and in all Section 106 discussions.
- Provision for archaeological assessment, investigation and recording, in accordance with PPG16, should be included in the items requiring development funding.
- Infrastructure provision should, where relevant, include contributions for long-term maintenance of sites.
- Concern is expressed that delivery rates in the housing trajectory have been “stepped up” when on other sites within the housing trajectory for South Cambridgeshire District Council as a whole, delivery is being delayed.

Policy NW28: Construction Process

- Construction spoil must not either during the course of the development or permanently be stacked or left on or near the boundaries of the site where they adjoin or are close to existing dwellings.
- The phrase “where practicable” when read with paragraph (d) has insufficient rigour to protect parts of the City from disruption.
- Account has not been taken of the impact of the development on adjoining and adjacent residences.

Policy NW29: Strategic Landscaping

- The policy should be reworded to make specific reference to impacts on geodiversity.

Policy NW30: Phasing and Need

- Construction of the North West Cambridge site should be scaled and phased with respect to construction at the NIAB site and construction access to the site should be primarily through the University’s property on Madingley Road.
- Policy should not require demonstration that there is a need for the University or collegiate housing. This need was established through the Local Plan Inquiry.
- To provide more certainty with regards to delivery, a Needs Assessment should be submitted and at the earliest possible opportunity.
- More stringent criteria for assessment of University need have to be developed, including reference to the need to consider alternative site opportunities and to place the onus more directly on the University to justify the release of the site.
- The site should be phased to start from the existing urban edge, i.e. from the eastern part of the site. Providing for the start of development on the western part of the site would leave the development divorced from the urban area and would represent an incongruous starting point for the development.
- The housing trajectory should be adjusted to reflect a more realistic expectation of delivery, founded upon a more robust evidence base.

Housing Trajectory

- Concern is raised in relation to the figures provided within the housing trajectory for the following reasons:
 - There is clear recognition that there are many factors which are beyond the control of Ipa’s and the development industry and therefore rates of delivery are uncertain;
 - The site is not capable of accommodating the number of houses identified;
 - The AAP recognises that the University has to prove its need for the land to be released for development. Should the University

be unable to prove this need, all or part of the proposed development would not proceed.

In view of the above we are concerned about the over-reliance on this site in terms of meeting housing requirements.

- The housing trajectory should be consistent with figures contained in the South Cambs AMR (2007), which provides for a total of 400 units to be completed by 2016 as opposed to the revised position within the AAP of some 550 units. Concern is expressed that the delivery rates have been “stepped up” when on other sites within the housing trajectory for South Cambridgeshire District Council as a whole, delivery is being delayed.
- The housing trajectory should make provision for a minimum of 2,500 dwellings as this makes deliverability more secure.
- In order to comply with the national Strategic Housing Land Availability Assessment Practice Guidance, a comprehensive SHLAA should be produced jointly with key stakeholders in order that all assumptions are as realistic and accurate as possible.

Table 11.1 – Core and Local Output Indicators

- Biodiversity and geodiversity should be included here.

Proposals Map

- Land at Madingley Road does not perform the functions of the Cambridge Green Belt and should not therefore be allocated as Green Belt in the AAP. The land should be allocated as Open Countryside.
- The development site would not deliver the Plan’s development proposals.
- The development boundary is not based on a consistent evaluation process and does not consider masterplanning principles and is not based on up-to-date information.
- Land designated as Green Belt does not serve a Green Belt function.
- Part of the Green belt boundary is not defined by readily recognisable features in the landscape. Designation of the development footprint as the Green Belt boundary does not enable sufficient flexibility to bring forward a sustainable development through masterplan refinement
- The strategic gap appears to provide for reduced opportunities for accessibility, biodiversity and landscape and creates poor separation between Girton and Cambridge.
- Whilst the limited size of the green corridor may be sufficient to accommodate recreational facilities, biodiversity and landscape may be compromised. Amend the proposals map to increase the strategic gap.
- The Green Belt Landscape Study recognised the heritage and landscape values of land below Girton Ridge and as such the development parcels should exclude land to the south of Girton Ridge.
- Boundary of the SSSI is incorrect and should be amended.
- The location of a major development site so close to the existing SSSI would be directly damaging to the special geological interest of this

site. In addition, specialist survey work has indicated that surrounding land, in all likelihood has features of additional special geological importance, which would be sterilised by the location of major development in the vicinity of the SSSI. Would prefer to see the area of special geological interest incorporated within the area of natural green space (prior to a process of SSSI re-notification).

Appendix 3: Open Space and Recreation Standards

- Natural England's Accessible Natural Greenspace Standards (ANGST) should be referenced throughout this appendix.