

## **Appendix 2**

### **EAST CAMBRIDGESHIRE LOCAL PLAN (FURTHER DRAFT) CONSULTATION JANUARY 2017**

#### **RESPONSE BY CAMBRIDGESHIRE COUNTY COUNCIL**

##### **1. INTRODUCTION**

- 1.1 The following comments have been made on behalf of Cambridgeshire County Council, following endorsement by the Economy and Environment Committee on 9th February 2017.
- 1.2 The County Council supports the overarching vision and objectives and welcomes the requirement for new infrastructure proposed in the Local Plan. This response comprises comments on the policies and proposals in the draft local plan that are relevant to a range of County Council service areas. The County Council will continue to work closely with the District Council during subsequent stage of the Plan to ensure that potential impacts of new development are properly assessed and evaluated and infrastructure planning appropriately addresses these impacts.
- 1.3 Please find below the key issues regarding the Plan.
- 1.4 Note that all comments below have been submitted electronically to the East Cambridgeshire District Council Website and some wording may have changed in order to adapt it to the consultation portal format.

##### **2. MINERALS AND WASTE**

###### BOT.E1 and BOT.LGS1

- 2.1 These sites lie entirely within the Safeguarding Area for the Bottisham Waste Water Treatment Works (Policy W7D) designated by the adopted Cambridgeshire and Peterborough Minerals and Waste Site Specific Proposals Plan (2012). The overarching policy for this designation is Policy CS31 of the adopted Cambridgeshire and Peterborough Minerals and Waste Core Strategy (2011). This policy places a presumption against allowing development which would be occupied by people; and where new development is proposed an odour assessment report should accompany any planning application. Permission should only be granted when it has been demonstrated that the proposed development would not be adversely affected by the continued operation of the existing waste water treatment works. It is suggested that consideration should be given to these policies prior to allocation / development, but in this instance it is also noted that there is residential development already existing between the proposed allocation sites and the Bottisham Waste Water Treatment Works. Nonetheless, it would be advisable to consult Anglian Water to confirm that an

intensification of development in this area would not pose a problem. (It is noted that BOT.H2 already has outline consent).

Policy Ely 3 (ELY.M1 and ELY.E1) and Policy Ely 2

- 2.2 The eastern part of this allocation falls almost entirely within a Waste Water Treatment Work (WWTW) Safeguarding Area for an allocation for a new Ely WWTW, which is made through the adopted Cambridgeshire and Peterborough Mineral and Waste Core Strategy (2011) and associated Site Specific Proposals Plan (2012).
- 2.3 Policy CS17 of the above Core Strategy makes provision for an Area of Search to be identified for a new WWTW which may be located to the north of Ely. This Area is identified through Policy SSP W6A of the Site Specific Proposals Plan, and this allocation is safeguarded through a WWTW Safeguarding Area (designated through Policies CS31 and SSP W7N). Policy CS31 places a presumption against allowing development which would be occupied by people, including residential uses within this Area.
- 2.4 However, the development/master planning of the allocated land is well advanced, and there is no WWTW in place. This means it is likely that if a new WWTW is required in the future it will be located north of the railway line. It is important that the long term capacity to deliver a new Ely WWTW within the WWTW Area of Search should be retained and this capacity should be safeguarded should further proposals come through the East Cambridgeshire Local Plan processes for Ely north.

Policy Ely 3 (ELY.M5)

- 2.5 This site lies partly within the Safeguarding Area for the Ely (New) Waste Water Treatment Works (WWTW) (Policy W7O) designated by the adopted Cambridgeshire and Peterborough Minerals and Waste Site Specific Proposals Plan (2012). The overarching policy for this designation is Policy CS31 of the adopted Cambridgeshire and Peterborough Minerals and Waste Core Strategy (2011). This policy places a presumption against allowing development which would be occupied by people (residential, industrial, commercial, sport and recreation); and permission should only be granted when it has been demonstrated that the proposed development would not be adversely affected by the continued operation of the existing waste water treatment works.
- 2.6 However, it is noted that emerging Policy Ely3 requires development to be in accordance with the principles established by consent 13/00122/ESF. Any development in this allocation area must be compatible with the WWTW, so that their ongoing operation will not be prejudiced in the future.

### Policy Ely 3 (ELY.E2) and Policy LP8

- 2.7 This site lies partly within the Waste Consultation Area for the Witchford Household Recycling Centre (Policy W8BG) designated by the adopted Cambridgeshire and Peterborough Site Specific Proposals Plan (2012). The overarching policy for this designation is Policy CS30 of the adopted Cambridgeshire and Peterborough Minerals and Waste Core Strategy (2011).
- 2.8 This policy seeks to safeguard waste management facilities which make a significant contribution to managing Cambridgeshire's waste; and the policy states that development will only be permitted where it is demonstrated that this will not prejudice existing or future planned waste management operations. Typically industrial uses (B2, B8) are unlikely to prejudice waste management operations, but B1 may be sensitive. Emerging Policy LP8 (or accompanying supporting text) should make this situation clear in order to ensure development is compatible and can be delivered.

### Policy Fordham 3 (FRD.H1 and FRD.M2)

- 2.9 This site lies within the Mineral Safeguarding Area for Sand and Gravel, designated by the adopted Cambridgeshire and Peterborough Core Strategy and shown on Proposals Map C (2011). The overarching policy is CS26 Mineral Safeguarding Areas which sets out criteria which must be met in order for development to be permitted. However, in this instance the proposed site is adjacent to existing development and in close proximity to the highway, and thus the mineral is unlikely to be worked as an economic mineral resource. No objections are therefore raised in this context to the proposed allocation.
- 2.10 However, in the event that mineral is extracted during the course of the proposed development the County Council would expect to see the mineral put to a sustainable use, i.e. either used in the development itself or potentially taken off site to be processed and used for aggregate purposes. Ensuring the sustainable use of mineral extracted during the course of a development is consistent with the principles of the adopted Minerals and Waste Core Strategy (Policy CS42) which addresses incidental mineral extraction.

### Policy Fordham 3 (FRD.E1) and Policy Fordham 6

- 2.11 Only a small part of this larger site which is not developed lies within the Mineral Safeguarding Area for Sand and Gravel, designated by the adopted Cambridgeshire and Peterborough Core Strategy and shown on Proposals Map C (2011). The overarching policy is CS26 Mineral Safeguarding Areas which sets out criteria which must be met in order for development to be permitted. However, in this instance there is very little mineral within the site, and it is in proximity to existing development. Thus

the mineral is unlikely to be worked as an economic mineral resource; and no objections are raised in this context to this site being allocated.

- 2.12 However, in the event that mineral is extracted during the course of the proposed development the County Council would expect to see the mineral put to a sustainable use i.e. either used in the development itself or potentially taken off site to be processed and used for aggregate purposes. Ensuring the sustainable use of mineral extracted during the course of a development is consistent with the principles of the adopted Minerals and Waste Core Strategy (Policy CS42) which addresses incidental mineral extraction.
- 2.13 This site also lies partly in the Transport Safeguarding Area for the European Metal Recycling Railhead, Snailwell, designated by Policy T2D of the adopted Cambridgeshire and Peterborough Minerals and Waste Site Specific Proposals Plan (2012) (which is not shown as required on the Proposals Map). The overarching policy is Policy CS23 of the adopted Cambridgeshire and Peterborough Minerals and Waste Core Strategy (2011). This policy places a presumption against any development in the Transport Safeguarding Area which could prejudice the existing or potential use of the protected railhead for the transport of minerals and / or waste.
- 2.14 This site also lies largely within the Waste Consultation Area for the European Metal Recycling site at Fordham Road, Snailwell (Policy W8T) designated by the adopted Cambridgeshire and Peterborough Site Specific Proposals Plan (2012) (the boundary of which is incorrect on East Cambridgeshire Local Plan Proposals Map). The overarching policy for this designation is Policy CS30 of the adopted Cambridgeshire and Peterborough Minerals and Waste Core Strategy (2011). This policy seeks to safeguard waste management facilities which make a significant contribution to managing Cambridgeshire's waste; and the policy states that development will only be permitted where it is demonstrated that this will not prejudice existing or future planned waste management operations.
- 2.15 Typically industrial uses (B2, B8) are unlikely to prejudice waste management operations or a railhead. Emerging Policy Fordham 6 should reflect the points outlined above in the interests of ensuring deliverability; and this Policy should require the policy designations of the adopted Cambridgeshire and Peterborough Minerals and Waste Core Strategy (2011) and Site Specific Proposals Plan (2012) to be taken into account in the proposed Concept Plan and subsequent development proposals.

Policy Kennett 3 (KEN.M1) and Policy Kennett 4

- 2.16 This site lies partly within the Waste Consultation Area for the allocation at The Carrops, Red Lodge, and the existing Kennett Landfill site which is designated by Policy W8BB of the adopted Cambridgeshire and Peterborough Site Specific Proposals Plan (2012). The Carrops, Red Lodge site is an existing waste transfer

station and is allocated for additional waste management uses which may include materials recovery facility; in vessel composting; inert waste recycling and new waste technologies. The Kennett Landfill site is an active landfill site. The overarching policy for this designation is Policy CS30 of the adopted Cambridgeshire and Peterborough Minerals and Waste Core Strategy (2011). This policy seeks to safeguard waste management facilities which make a significant contribution to managing Cambridgeshire's waste; and the policy states that development will only be permitted where it is demonstrated that this will not prejudice existing or future planned waste management operations. In addition the site falls in a Mineral Consultation Area for Kennett (Policy M9J) designated under the adopted Site Specific Plan (2012). The overarching policy in the adopted Core Strategy is CS27 which states that development will only be permitted in this area when it has been demonstrated that it will not prejudice the, in this case, existing mineral extraction.

- 2.17 The recognition of the designations made by the adopted Cambridgeshire and Peterborough Minerals and Waste Site Specific Proposals Plan (2012) in Policy Kennett 4, and the requirement to consult the County Council as Mineral and Waste Planning Authority is supported.

Policy Littleport 3 (LIT.E1)

- 2.18 This site lies partly within the Waste Consultation Area for the waste management site Murfitts, Wisbech Road, Littleport (Policy W8AN), designated by the adopted Cambridgeshire and Peterborough Site Specific Proposals Plan (2012). The overarching policy for this designation is Policy CS30 of the adopted Cambridgeshire and Peterborough Minerals and Waste Core Strategy (2011).
- 2.19 This policy seeks to safeguard waste management facilities which make a significant contribution to managing Cambridgeshire's waste; and the policy states that development will only be permitted where it is demonstrated that this will not prejudice existing or future planned waste management operations. However, in this instance the facility which was present when the designation was made has since ceased. Nonetheless the principle of the use of this site for waste management purposes is established, and therefore any development proposed should be compatible. This situation should be made clear in emerging Policy Littleport 3 or its supporting text.

Policy Littleport 3 (LIT.M3) and Policy Littleport 6

- 2.20 A very small part of the site lies within the Waste Consultation Area for Cleanaway Depot, Ely Road, Littleport (Policy W8R), designated by the adopted Cambridgeshire and Peterborough Site Specific Proposals Plan (2012). The overarching policy for this designation is Policy CS30 of the adopted Cambridgeshire and Peterborough Minerals and Waste Core Strategy (2011).

- 2.21 This policy seeks to safeguard waste management facilities which make a significant contribution to managing Cambridgeshire's waste; and the policy states that development will only be permitted where it is demonstrated that this will not prejudice existing or future planned waste management operations. Given that the majority of the site falls outside the Waste Consultation Area it is unlikely the development would prejudice the Depot, However, its proximity will still need to be taken into account and this situation should be made clear in emerging Policy Littleport 6 or its supporting text.

Policy Soham 3 (SOH.H1)

- 2.22 A small part of this site lies within the Mineral Safeguarding Area for Sand and Gravel, designated by the adopted Cambridgeshire and Peterborough Core Strategy and shown on Proposals Map C (2011). The overarching policy is CS26 Mineral Safeguarding Areas which sets out criteria which must be met in order for development to be permitted. However, in this instance the proposed site is in close proximity to existing development and it is unlikely to be an economic resource given its size; therefore no objections are raised in this context to this site being allocated.
- 2.23 However, in the event that mineral is extracted during the course of the proposed development the County Council would expect to see the mineral put to a sustainable use i.e. either used in the development itself or potentially taken off site to be processed and used for aggregate purposes. Ensuring the sustainable use of mineral extracted during the course of a development is consistent with the principles of the adopted Minerals and Waste Core Strategy (Policy CS42) which addresses incidental mineral extraction.

Policy Soham 3 (SOH.H5) and Policy Soham 5

- 2.24 This site lies entirely within the Mineral Safeguarding Area for Sand and Gravel, designated by the adopted Cambridgeshire and Peterborough Core Strategy and shown on Proposals Map C (2011). The overarching policy is CS26 Mineral Safeguarding Areas which sets out criteria which must be met in order for development to be permitted. In this instance the proposed site is in close proximity to existing development and the highway, and it is therefore unlikely to be worked as an economic resource and therefore no objections are raised in this context to this site being allocated.
- 2.25 However, in the event that mineral is extracted during the course of the proposed development the County Council would expect to see the mineral put to a sustainable use i.e. either used in the development itself or potentially taken off site to be processed and used for aggregate purposes. Ensuring the sustainable use of mineral extracted during the course of a development is consistent with the principles of the adopted Minerals and Waste Core Strategy (Policy CS42) which addresses incidental mineral extraction. The requirement for this to be taken into account should be

reflected in emerging Policy Soham 5; and in the required masterplan (ideally also taking account of SOH.H6).

#### Policy Soham 3 (SOH.H6) and Policy Soham 6

- 2.26 This site lies entirely within the Mineral Safeguarding Area for Sand and Gravel, designated by the adopted Cambridgeshire and Peterborough Core Strategy and shown on Proposals Map C (2011). The overarching policy is CS26 Mineral Safeguarding Areas which sets out criteria which must be met in order for development to be permitted. In this instance the proposed site is in close proximity to existing development and the highway, and it is therefore unlikely to be worked as an economic resource and therefore no objections are raised in this context to this site being allocated.
- 2.27 However, in the event that mineral is extracted during the course of the proposed development the County Council would expect to see the mineral put to a sustainable use i.e. either used in the development itself or potentially taken off site to be processed and used for aggregate purposes. Ensuring the sustainable use of mineral extracted during the course of a development is consistent with the principles of the adopted Minerals and Waste Core Strategy (Policy CS42) which addresses incidental mineral extraction. The requirement for this to be taken into account should be reflected in emerging Policy Soham 6; and in the required master plan (ideally also taking account of SOHH5).

#### Policy Soham 3 (SOH.H7)

- 2.28 The majority of this site lies within the Mineral Safeguarding Area for Sand and Gravel, designated by the adopted Cambridgeshire and Peterborough Core Strategy and shown on Proposals Map C (2011). The overarching policy is CS26 Mineral Safeguarding Areas which sets out criteria which must be met in order for development to be permitted. In this instance the proposed site is in close proximity to existing development and the highway, and it is therefore unlikely to be worked as an economic resource and therefore no objections are raised in this context to this site being allocated.
- 2.29 However, in the event that mineral is extracted during the course of the proposed development the County Council would expect to see the mineral put to a sustainable use i.e. either used in the development itself or potentially taken off site to be processed and used for aggregate purposes. Ensuring the sustainable use of mineral extracted during the course of a development is consistent with the principles of the adopted Minerals and Waste Core Strategy (Policy CS42) which addresses incidental mineral extraction.

### Policy Soham 3 (SOH.H8)

- 2.30 A small part of this site lies within the Mineral Safeguarding Area for Sand and Gravel, designated by the adopted Cambridgeshire and Peterborough Core Strategy and shown on Proposals Map C (2011). The overarching policy is CS26 Mineral Safeguarding Areas which sets out criteria which must be met in order for development to be permitted. However, in this instance the proposed site is in close proximity to existing development. It is unlikely to be an economic resource therefore no objections are raised in this context to this site being allocated.
- 2.31 However, in the event that mineral is extracted during the course of the proposed development the County Council would expect to see the mineral put to a sustainable use i.e. either used in the development itself or potentially taken off site to be processed and used for aggregate purposes. Ensuring the sustainable use of mineral extracted during the course of a development is consistent with the principles of the adopted Minerals and Waste Core Strategy (Policy CS42) which addresses incidental mineral extraction.

### Policy Soham 3 (SOH.H9) and Policy Soham 7

- 2.32 The majority of this site lies within the Mineral Safeguarding Area for Sand and Gravel, designated by the adopted Cambridgeshire and Peterborough Core Strategy and shown on Proposals Map C (2011). The overarching policy is CS26 Mineral Safeguarding Areas which sets out criteria which must be met in order for development to be permitted. In this instance the proposed site is in close proximity to existing development and the highway, and it is therefore unlikely to be worked as an economic resource and therefore no objections are raised in this context to this site being allocated.
- 2.33 However, in the event that mineral is extracted during the course of the proposed development the County Council would expect to see the mineral put to a sustainable use i.e. either used in the development itself or potentially taken off site to be processed and used for aggregate purposes. Ensuring the sustainable use of mineral extracted during the course of a development is consistent with the principles of the adopted Minerals and Waste Core Strategy (Policy CS42) which addresses incidental mineral extraction. The requirement for this to be taken into account should be reflected in emerging Policy Soham 7, and in the required master planning.

### Policy Soham 3 (SOH.H10)

- 2.34 This site lies entirely within the Safeguarding Area for the Soham Waste Water Treatment Works (Policy W7AK) designated by the adopted Cambridgeshire and Peterborough Minerals and Waste Site Specific Proposals Plan (2012). The overarching policy for this designation is Policy CS31 of the adopted Cambridgeshire



and Peterborough Minerals and Waste Core Strategy (2011). This policy places a presumption against allowing development which would be occupied by people; and where new development is proposed an odour assessment report should accompany any planning application.

- 2.35 Permission should only be granted when it has been demonstrated that the proposed development would not be adversely affected by the continued operation of the existing waste water treatment works. Given the proximity to the Works consideration must be given to this policy and the Council must satisfy itself that this allocation is deliverable, i.e. that it will not prejudice the ongoing operations of the WWTW. Advice on this allocation and its potential impact on the WWTW must be secured from Anglian Water and in this context the requirement for an odour mitigation scheme in emerging Policy Soham 3 is supported.

#### Policy Soham 3 (SOH.H11) and Policy Soham 8

- 2.36 This site lies partly within the Mineral Safeguarding Area for Sand and Gravel, designated by the adopted Cambridgeshire and Peterborough Core Strategy and shown on Proposals Map C (2011). The overarching policy is CS26 Mineral Safeguarding Areas which sets out criteria which must be met in order for development to be permitted. However, in this instance the proposed site is in close proximity to existing development. It is unlikely to be worked as an economic resource therefore no objections are raised in this context to this site being allocated.
- 2.37 However, in the event that mineral is extracted during the course of the proposed development the County Council would expect to see the mineral put to a sustainable use i.e. either used in the development itself or potentially taken off site to be processed and used for aggregate purposes. Ensuring the sustainable use of mineral extracted during the course of a development is consistent with the principles of the adopted Minerals and Waste Core Strategy (Policy CS42) which addresses incidental mineral extraction. The requirement for this resource to be taken into account should be reflected in emerging Policy Soham 8, and in the required master planning.

#### Policy Soham 3 (SOH.H14)

- 2.38 This site lies partly within the Mineral Safeguarding Area for Sand and Gravel, designated by the adopted Cambridgeshire and Peterborough Core Strategy and shown on Proposals Map C (2011). The overarching policy is CS26 Mineral Safeguarding Areas which sets out criteria which must be met in order for development to be permitted. In this instance the proposed site is in close proximity to existing development. It is unlikely to be worked as an economic resource therefore no objections are raised in this context to this site being allocated.

- 2.39 However, in the event that mineral is extracted during the course of the proposed development the County Council would expect to see the mineral put to a sustainable use i.e. either used in the development itself or potentially taken off site to be processed and used for aggregate purposes. Ensuring the sustainable use of mineral extracted during the course of a development is consistent with the principles of the adopted Minerals and Waste Core Strategy (Policy CS42) which addresses incidental mineral extraction.

Policy Soham 3 (SOH.E2) and Policy Soham 11

- 2.40 This site lies entirely within the Mineral Safeguarding Area for Sand and Gravel, designated by the adopted Cambridgeshire and Peterborough Core Strategy and shown on Proposals Map C (2011). The overarching policy is CS26 Mineral Safeguarding Areas which sets out criteria which must be met in order for development to be permitted. In this instance the proposed site is in close proximity to the highway and existing farm development which limits the scope for the site itself to be an area of economic resource. However, the site is located in a wider area of mineral resource, and mineral has been extracted to the north of this site.
- 2.41 Therefore in the event that the site is allocated and mineral is extracted during the course of the proposed development the County Council would expect to see the mineral put to a sustainable use i.e. either used in the development itself or potentially taken off site to be processed and used for aggregate purposes. Ensuring the sustainable use of mineral extracted during the course of a development is consistent with the principles of the adopted Minerals and Waste Core Strategy (Policy CS42) which addresses incidental mineral extraction. The requirement for this to be taken into account should be reflected in emerging Policy Soham 11, and in the required master planning.

Policy Soham 3 (SOH.M1) and Policy Soham 10

- 2.42 This site lies almost entirely within the Mineral Safeguarding Area for Sand and Gravel, designated by the adopted Cambridgeshire and Peterborough Core Strategy and shown on Proposals Map C (2011). The overarching policy is CS26 Mineral Safeguarding Areas which sets out criteria which must be met in order for development to be permitted. In this instance the proposed site is in close proximity to the highway and existing farm development which limits the scope for the site itself to be an area of economic resource. However, the site is located within the Soham Bypass and is bounded by residential development on several sides. It is unlikely that the resource would come forward for mineral extraction.
- 2.43 However, if the allocation proceeds and mineral is extracted during the course of the proposed development the County Council would expect to see the mineral put to a sustainable use i.e. either used in the development itself or potentially taken off site to

be processed and used for aggregate purposes. Ensuring the sustainable use of mineral extracted during the course of a development is consistent with the principles of the adopted Minerals and Waste Core Strategy (Policy CS42) which addresses incidental mineral extraction. The requirement for the mineral resource is to be taken into account must be reflected in emerging Policy Soham 10, and in the required master planning.

#### Policy Soham 3 (SOH.M2)

- 2.44 This site lies almost entirely within the Safeguarding Area for the Soham Waste Water Treatment Works (Policy W7AK) designated by the adopted Cambridgeshire and Peterborough Minerals and Waste Site Specific Proposals Plan (2012). The overarching policy for this designation is Policy CS31 of the adopted Cambridgeshire and Peterborough Minerals and Waste Core Strategy (2011). This policy places a presumption against allowing development which would be occupied by people; and where new development is proposed an odour assessment report should accompany any planning application. Permission should only be granted when it has been demonstrated that the proposed development would not be adversely affected by the continued operation of the existing waste water treatment works. Given the proximity to the Works consideration must be given to this policy and the Council must satisfy itself that this allocation is deliverable i.e. that it will not prejudice the ongoing operations of the WWTW. Advice on this allocation and its potential impact on the WWTW must be secured from Anglian Water; and the requirement through Policy Soham 3 to ensure potential detrimental impact of odour is supported.

#### Policy Stretham 3 (STR.H1)

- 2.45 A significant portion (the southern half) of this site lies within the Safeguarding Area Stretham Waste Water Treatment Works (Policy W7AP) designated by the adopted Cambridgeshire and Peterborough Minerals and Waste Site Specific Proposals Plan (2012). However, it is noted that the southern part of the site already has planning permission and is under construction; and the northern part of the site lies outside the WWTW Safeguarding Area. No objection to this allocation.

### **3. CHILDREN FAMILIES AND ADULTS**

- 3.1 These comments have been provided by the CFA New Communities Team within the County Council whose overall priorities are to:
- Consider Older Peoples accommodation (CC Older Peoples Accommodation Strategy 2016)
  - Ensure that a new community, defined as a development greater than 500 homes, is supported to form into a resilient healthy community with a focus placed

on wellbeing (CCC Supporting New Communities Strategy 2015 & JSNA New Housing Developments And The Built Environment 2016)

- 3.2 These priorities closely relate to the local plan objectives set out in section 2.1 and particularly Objective 5 “Healthy communities” (see separate comments from Public Health) & Objective 6 “Inclusive communities”.

#### **Detailed Feedback / Comment**

- 3.3 Page 9, Objective 6 - The title “inclusive communities” is misleading. The Council would prefer to use a term more in line with “strong communities” or “resilient communities”. We are comfortable with the wording which encapsulates CCC priorities in this area, however, this objective is not clearly picked up in any of the following Local Plan policies.

#### **Section 3 – A Growing East Cambridgeshire**

- 3.4 Page 14, Paragraph 3.6 – The County Council understands the reason for the decision adopt a proportionate distribution of growth across the district. However, in terms of service provision and support to new communities there is a benefit to concentrating development where infrastructure can be more efficiently provided and sustained. An example would be the provision of older people’s residential care, where there tends to be a desire from the private sector providers to only support projects in more urban areas. It may be helpful to reflect in this paragraph that whilst the approach has been taken, consideration would be given to this aspect.

#### **Section 4 – Delivering Homes & Jobs**

- 3.5 Page 19 para 4.2 – The title for this section is confusing. For the majority of readers the term community development means supporting a community to form and flourish and community-led developments about developing self-supporting communities that place less demand on the public purse. Under this section the expectation would be to read about how objective 6 would be developed. If this section is only to reference CLT schemes the title should be changed and a new section added to talk about true community development, either here or perhaps more appropriately in section 6
- 3.6 Page 22 Policy LP6 – Should make reference to Key worker housing. Clearer wording required on general & specialist older peoples housing (Extra care and Care homes) to pick up the discussion point in 4.3.10 & 4.3.11 (reference to be made to CCC Older Peoples Accommodation Strategy 2016)
- 3.7 Para 4.3.10 acknowledges that older people (and others needing care) are wanting more flexible forms of living and support to maintain their independence and control over their lives. However, subsequent wording in this and subsequent paragraphs then focusses solely on residential care, retirement villages and extra care accommodation.

Whilst there will be a need for this provision, there will only be a minority of people who will require the specific accommodation as described. The vast majority of older people will never go into residential care or any other type of specialist accommodation, the majority of people want and intend to continue to live in their own homes.

- 3.8 Whilst it is acknowledged that the local plan cannot prescribe technical standards such as lifetime homes, the County Council welcomes and supports the measures in Policy LP6 to promote adaptable homes.

## **Section 5 - Local Transport & Infrastructure**

- 3.9 Page 34 Policy LP16 – Developer contributions: CCC require new communities (developments over 500 homes) to contribute to supporting the community and providing services. This is captured in the CCC Supporting New Communities Strategy 2016 which was supported by the Chief Planning Officers Group. Best practice has now been set with Northstowe phase 2 and is anticipated to be replicated in Camborne West, the expectation is that this approach will be applied to all large sites. Would ask that the wording be change to reflect this thinking.
- 3.10 Page 37 para 5.6 – Wording to be revised to reflect the role of community facilities for connecting and supporting new and existing communities. This should reflect informal meeting spaces, “bumping grounds” and access points to easily access services and support. CCC would be happy to developed this wording more with ECDC to link better in with the emerging multiagency Community Hub Strategy (Contact Anita Howard 01223 715588)
- 3.11 Page 37 Policy LP19 – Community facilities must be multi-use and be designed to be flexible to provide services as well as enable community-led groups and activities to run. Failure to do so may create facilities that are not used and have a negative effect on the community as it develops. Priority for flexibility, multiuse and sustainability (in terms of governance) should be a priority for considering support.

## **Section 6 – A fantastic place to Live**

- 3.12 Picking up on Objective 6 (page 9) there is no reference in this section to building Sustainable communities as set out in the Supporting New Communities Strategy and the JSNA referenced above. CCC would be happy to support ECDC in writing an additional policy on developing communities that are strong, resilient and healthy (Contact Anita Howard 01223 715588). **Failure to address this omission may result in an objection.**

## **4. LIBRARIES AND LIFELONG LEARNING**

### **Paragraph 7.8.1 (Burwell)**

- 4.1 The list of services in this paragraph should be expanded to include the library to reflect the importance of this facility to the village and the wider community.

### **Policy Burwell 2**

- 4.2 The level of housing growth proposed for Burwell in the Local Plan will increase the population by over 1,000 (circa 15%). This will generate significant new demand on existing library facility in the village. Whilst the library is located within the grounds of the Village College there is space available for a modest expansion of around 90m<sup>2</sup> that would be sufficient to provide capacity for the anticipated increase in population
- 4.3 The County Council requires an amendment to Policy Burwell2 to include the expansion and improvement of library services within the list of priority infrastructure and community facilities.

### **Paragraph 7.22 (Littleport) and Policy Littleport 2**

- 4.4 The scale of housing growth proposed for Littleport in the Local Plan is significant and will result in a major increase in the population which will place demands on existing community facilities and in particular library services which will need to expand in response to this increased demand. The current library is at capacity and there is no potential for expansion within the existing constrained site. In order to meet demand the library services the County Council will require a new site close to the town centre.
- 4.5 The County Council requires an amendment to Policy Littleport2 to include the expansion and improvement of library services within the list of priority infrastructure and community facilities.

## **5. EDUCATION**

### **Strategy and Distribution of Growth**

- 5.1 The current adopted local plan set out proposals for large scale development in the market towns of Soham, Ely and Littleport and to a lesser scale in the larger villages such as Burwell. This has continued into the draft local plan to some extent as the adopted allocations have been rolled forward. This pattern of growth is already reflected in the County Council's plans prepared for new and expanded primary schools and the outcome of the East Cambridgeshire Secondary School Review. A number of these review recommendations are now proceeding to implementation.
- 5.2 The draft Plan, however, proposes to distribute growth across the District with a range of settlements taking a proportionate share of the new development. There will be

major implications for the delivery of school places as a consequence of the new spatial strategy. The challenges arising from this are the need to find suitable mitigation to new growth and increasing demand for school places especially in rural settlements where primary schools are generally smaller, older in construction and located on restricted sites, which makes adaptation and expansion technically and economically difficult. The table below lists the primary schools in East Cambridgeshire that currently have no potential for expansion and therefore would not be able to mitigate the effect of new development. The limited scope for expansion coupled with increasing pupil roles may in certain settlements result in the need to travel further to access school places.

#### Primary Schools without Expansion Potential

- |                   |   |
|-------------------|---|
| • Cheveley        | • Mepal and Witcham                       |
| • Ely St John's   | • Spring Meadow Infants and Ely St Mary's |
| • Fen Ditton      | • Stretham                                |
| • Fordham         | • Swaffham Bulbeck                        |
| • Great Wilbraham | • Swaffham Prior                          |
| • Isleham         | • Teversham                               |
| • Isle of Ely     | • Rackham (Witchford)                     |
| • Kennett         | • Weatheralls – Soham                     |
| • Kettlefields    | • Wilburton                               |
| • Little Thetford |   |

- 5.3 All secondary schools have the potential for limited expansion. A new secondary school opens in Littleport in September 2017 which will increase capacity by 4FE or 600 places rising to 5FE or 750 places when required.
- 5.4 Solutions in and around the Newmarket area, where there are a lot of villages served by small primary schools on restricted sites, may be found by working with Forest Heath District Council and Suffolk County Council on a joint cross border education plan to find appropriate options to respond to proposed growth in a number of villages where existing primary schools are on limited sites. A joint working group recently held its first meeting and a further meeting will be held at the end of January 2017 to review some initial place planning research.
- 5.5 The ability to deliver appropriate mitigation in some cases may depend on the extent to which CCC & ECDC, its members and community regard as sustainable:
- Pupils attending schools outside their own village;

- Use of section 106/CIL payments to expand schools in neighbouring villages and towns rather than in the community taking development
- Opposition from parents and stakeholders regarding loss of community cohesion etc. There is an expectation among parents, particularly at primary age, that their children will attend the local village school.

- 5.6 **Schools sites and buildings** - avoid special planning designations such as green space, amenity land, buildings of special interest, identifying ongoing use for community etc. – these combine to sterilise the asset and being unable to realise the value from them. This in turn restricts the ability of the Council to invest in the delivery of alternative solutions which in terms of green space and community facilities will be re-provided in any case.
- 5.7 **The operation of CIL** and the inclusion of education projects on the CIL 123 list continues to be a significant issue. There are an increased number of developments in the mid-sized range which neither trigger section 106 contributions nor enable on-site infrastructure. These developments are therefore dependent on limited and oversubscribed CIL funding which is not capable of delivering the scale of contributions necessary to mitigate the impact of developments. The combined impact of these developments is significant and require mitigation but the opportunity to obtain developer funding is diminished. At present, the Littleport Secondary School is the only education project that is receiving an allocation of CIL funding.

### **Individual City Town and Village Proposals**

#### Bottisham

- 5.8 The scale of development proposed in Policy Bottisham 3 can be mitigated.

#### Burrough Green

- 5.9 There is spare capacity to allow for a small increase in catchment numbers arising from Policy Burrough 3.

#### Burwell

- 5.10 Previous plans have provided for this level of development in Burwell. The primary school has been expanded by 1FE and has capacity and Bottisham VC is currently being expanded by 3FE as a part of a joint project between CCC and EFA.

#### Cheveley

- 5.11 The primary school operates at capacity and cannot be expanded. Mitigation of even low levels of development would require some pupils to be educated at schools in neighbouring Newmarket or surrounding villages.



### Ely

- 5.12 The new Local Plan is a continuation of earlier plans for the Town. Mitigation already identified in the form of two new primary schools (The Isle of Ely Primary School has already opened) and the opening of a new secondary school in Littleport from September 2017.

### Fordham

- 5.13 Policy Fordham 3 makes provision for over 200 houses. The school has recently been expanded for an in-catchment need but at the time account was also taken of the potential for future housing development and therefore the level of development proposed can be mitigated. There is no further expansion potential on the site of Fordham Primary School following its enlargement to 2FE. The expansion of secondary education may be required at Soham VC given the cumulative impacts of development throughout its catchment area.
- 5.14 There is currently a significant deficit in the required number of early years places available in Fordham and this situation will be exacerbated with new development in the village. The local plan should seek to ensure that any new or improved community facilities linked to these developments are also be suitable for use by early years.

### Haddenham

- 5.15 The levels of development proposed in Policy Haddenham 3 (80 dwellings) can be mitigated at the local primary school which has potential for expansion. There is an emerging pressure on places at the local secondary school but again that can be mitigated as the site has the potential for expansion.

### Isleham

- 5.16 The primary school is at capacity and cannot be expanded on its current site. The level of development proposed will necessitate a discussion with the local planning authority and the developer of the largest allocation site on options for mitigating the impacts. The expansion of secondary education may be required at Soham VC given the cumulative impacts of development throughout its catchment area.
- 5.17 It may not be possible to meet the shortfall in capacity for early years within the existing setting at the primary school. There is an opportunity through Policy Isleham 2 to ensure that any new or improved community facilities can be made suitable for use by early years providers.

### Kennett

- 5.18 Policy Kennett 4 requires the provision of a new 1 FE primary school in association with the proposed development. Pre-application discussions progressing well with the

applicant in respect of this proposal and arrangements for delivering the school. The expansion of secondary education may be required at Soham VC given the cumulative impacts of development throughout its catchment area.

#### Little Downham

- 5.19 Some pressure on places as a consequence of low levels of proposed development. It may be necessary to mitigate this impact with small scale expansion of the primary school.

#### Littleport

- 5.20 Planned growth in the adopted local plan was reflected in the proposals for the education campus now under construction. A new primary school can be provided on this site when required and the secondary school can be expanded by a form of entry from 4FE to 5FE. However, additional allocations in the draft plan mean that further school provision will be needed and the statement in Policy Littleport 6 regarding the need for a further primary school on the site south of Grange Lane is welcomed. Work will need to be undertaken to establish whether a further expansion of the Littleport Secondary School is possible to take it beyond 5FE. If this is not possible, alternative means of mitigation may be necessary.
- 5.21 A strategic plan is needed resolve the shortage in early years places in Littleport which will be exacerbated as a result of additional proposed development.

#### Mepal and Witcham

- 5.22 There is limited spare capacity at the school and no potential to expand. Levels of development proposed are low and mitigation may be possible on a small scale.

#### Newmarket fringe developments

- 5.23 Place planning issues across the County Boundary will be considered as part of the joint work referred to earlier.

#### Soham

- 5.24 Existing levels of growth were provided for by the Shade Primary School which can be expanded by a further form of entry (210 places). At the higher levels of development further primary school provision will be required and the reference in Policy Soham 7 to the need for a primary school site in development site SOH.H9 is therefore welcome.
- 5.25 The level of development proposed will require the expansion of Soham VC to provide suitable mitigation.

### Stretham

- 5.26 Plans are already in place to expand the primary school in response to this development which has as the Local Plan states already started on site.

### Sutton

- 5.27 There will be a need to expand the primary school by 0.5FE or 105 places in response to the proposed level of development. There is also an emerging pressure on places at Witchford Village College and appropriate mitigation needs to be considered. The College can be expanded on its present site.

### Swaffham Bulbeck & Swaffham Prior

- 5.28 The primary school cannot be expanded but there is some spare capacity based on projections of future in-catchment numbers. Bottisham VC the catchment secondary school is being expanded in response to previous plans for growth.

### Wicken

- 5.29 The proposed level of development is small and the numbers arising need to be factored into the planning of primary and secondary school places in nearby Soham

### Wilburton

- 5.30 The primary school is operating close to capacity on a constrained site preventing further expansion. Although only small scale development is proposed it may be necessary to seek mitigation at a neighbouring village school.

### Witchford

- 5.31 There is some spare capacity looking at in-catchment numbers. However, the cumulative impact of these developments are likely to require an expansion of the existing primary school. However, this may be difficult on the present site and a discussion of possible options with the local planning authority and developers may be required.
- 5.32 There is also an emerging pressure on the catchment area secondary school, Witchford Village College. It can be expanded on its current site so the development proposed can be mitigated.

## **6. PUBLIC HEALTH**

- 6.1 The proposed Local Plan policies and supporting text have been reviewed against to the New Housing Developments and the Built Environment Joint Strategic Needs Assessment (JSNA)<sup>1</sup>.
- 6.2 The JSNA contains an evidence review of the impact of the built environment on health and has distilled the evidence into the following themes:
- Generic evidence supporting the built environment's impact on health
  - Green space
  - Developing sustainable communities
  - Community design (to prevent injuries, crime, and to accommodate people with disabilities)
  - Connectivity and land use mix
  - Communities that support healthy ageing
  - House design and space
  - Access to unhealthy/"Fast Food"
  - Health inequality and the built environment
- 6.3 The proposed Local Plan has therefore been reviewed against these themes to ensure the Local Plan contains specific policies to address the impact the built environment can have on health.

### **General Policy on Health and Wellbeing**

- 6.4 The objectives in the Table under section 2.1.10 – "5 Healthy Communities" (1. Enhance human health, 2. Reduce and prevent crime and reduce fear of crime, and 3. Improve the quantity and quality of publically accessible open space) are supported as is the objective to "Improve the quality, range and accessibility of services and facilities (e.g. health, transport, education, training, leisure opportunities" in the section on "Inclusive Communities".

### **Gaps**

- 6.5 The Healthy Communities section would benefit from cross referencing to the data in the Health Profile<sup>2</sup> for East Cambridgeshire to describe the specific health issues for East Cambridgeshire.

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<sup>1</sup> <http://cambridgeshireinsight.org.uk/joint-strategic-needs-assessment/current-jsna-reports/new-housing-developments-and-built-environment>

<sup>2</sup> <http://fingertipsreports.phe.org.uk/health-profiles/2016/e07000009.pdf>

- 6.6 Section 2.1.10 (Table of objectives) – Topic 6 “Inclusive Communities” Objective 2 currently reads “Redress inequalities related to age, gender, disability, race, faith, location and income” this should include Health Inequalities and therefore should be reworded to read “Redress inequalities, ***including health inequalities***, related to age, gender, disability, race, faith, location and income”.

### **Health Impact Assessment Policy**

- 6.7 The policy LP22 requires a Health Impact Assessment for developments over 50 dwellings this is supported but the policy needs to be firmer.

### Gaps

- 6.8 The current working of the HIA policy reads “Facilitate social interaction and create healthy, inclusive communities; a health impact assessment (HIA) should be provided for development schemes over 50 dwellings”.
- 6.9 The local plan doesn’t justify the threshold set at 50 dwellings or why other developments do not require a HIA, in addition there is no supporting text to explain what HIA is and the different forms a HIA can take. It is recommended that the policy is changed to set different thresholds for full HIAs and Rapid HIAs and supporting text is included to clarify the policy.
- 6.10 An amended policy could be<sup>3</sup>:

*New development will have a positive impact on the health and wellbeing of new and existing residents. Planning applications for developments of 20 or more dwellings or 1,000m<sup>2</sup> or more floorspace will be accompanied by a Health Impact Assessment to demonstrate this.*

- a) *For developments of 100 or more dwellings or 5,000m<sup>2</sup> or more floorspace a full Health Impact Assessment will be required;*
- b) *For developments between 20 and 100 dwellings or 1,000 and 5,000m<sup>2</sup> or more floorspace the Health Impact Assessment will take the form of an extended screening or rapid Health Impact Assessment.*

Supporting text could be<sup>4</sup>:

*Health Impact Assessment (HIA) is a method of considering the positive and negative impacts of development on the health of different groups in the population, in order to enhance the benefits and minimise any risks to health. To ensure that new developments have a positive impact on the health and wellbeing of new and existing residents the Council will require an HIA of development proposals to a level of detail appropriate to its scale and nature. It is recognised that HIAs are most effective for*

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<sup>3</sup> Taken from the South Cambridgeshire Proposed Local Plan

<sup>4</sup> Taken from the South Cambridgeshire Proposed Local Plan

*large scale developments and therefore for developments of less than 100 dwellings or 5,000 m<sup>2</sup> the Council will accept less detailed assessments.*

### **Green Space**

- 6.11 Policies LP20: Delivering Green Infrastructure, LP21 Open Space, Sport and Recreational Facilities, and LP29 Conserving Local Green Spaces are supported.
- 6.12 The open space standards contained in Part A and B of the Plan are supported.
- 6.13 The site specific policies in Section 7 – Policies for Places requiring additional or enhanced play space, open space and allotments are supported.

### Gaps

- 6.14 Section 5.7.2 could include “health” as a benefit so 5.7.2 reads “Green infrastructure provides a range of social, economic, health and environmental benefits.”
- 6.15 There is no specific policy determining the distance travelled to access open/green space. Public open spaces closer to a person’s home are associated with higher levels of use. Families that live further away visit parks less frequently. Overall use of public open space is positively associated with accessibility. Therefore the policy should be amended to include a distance requirement. A policy could be based on the Natural England Accessible Natural Greenspace Standard (ANGSt) which provides local authorities with a detailed guide as to what constitutes accessible green space. The Accessible Natural Greenspace Standard not only recommends the distance people should live from certain types of green spaces but also recommends the size of the green spaces in conjunction with distance to homes.
- 6.16 A policy therefore could be:

*All people should have accessible natural green space:*

- *Of at least two hectares in size, no more than 300m (five minutes’ walk) from home.*
- *At least one accessible 20 hectare site within 2km of home.*
- *One accessible 100 hectare site within 5km of home.*
- *One accessible 500 hectare site within 10km of home.*

This policy could be limited to apply to larger scale developments only.

- 6.17 The Local Plan would benefit from a supportive policy to encourage the provision of green space near older people’s housing. Walkable green spaces near the residences of older people aged 75+ significantly and positively influences five-year survival.

- 6.18 There is nothing specific on the design of green spaces, such as the inclusion of paths and drinking fountains, street furniture etc. these may be better addressed within design Supplementary Planning Documents rather than the Local Plan.
- 6.19 The Local Plan would benefit from a supportive policy to encourage the provision of markets and farmers markets. Farmers markets are a crucial place for social interaction in the lives of older people as well as families and children, when market shopping is a time “to bump into friends and chat at leisure”. In addition, market stalls take on the important role of including low income groups, who may be excluded from other shopping sites.

### **Developing Sustainable Communities**

- 6.20 Policy LP22: Achieving Design Excellence - Facilitate social interaction and create healthy, inclusive communities is supported.
- 6.21 The supporting text in section 5.4 which considers the provision of sustainable travel and makes the links between transport and healthier lifestyles is welcomed.
- 6.22 Policy LP23: Water Efficiency is supported.

### Gaps

- 6.23 The supporting text at 6.4.3 should include detrimental impacts on air quality of renewable energy production e.g. biomass. The policy could be amended to read:

*“However, renewable energy proposals can have detrimental implications, such as impact on the landscape, **impact on air quality and therefore human health**, impact on the setting of Ely Cathedral, the impact on protected species, the loss of productive agricultural land, and, for some technologies (e.g. biomass), the highway impacts associated with the ongoing regular delivery of material by lorries to and from the site.”*

### **Community Design**

- 6.24 The site specific policies in Section 7 – Policies for Places requiring Traffic calming measures are supported (in East Cambridgeshire the rate of people killed and seriously injured on roads is significantly worse than England average<sup>5</sup>)
- 6.25 Policy LP6: Meeting Local Housing Needs, the requirement that all new homes are to comply with Part M (Volume 1) of Building Regulations Category 2 (accessible and adaptable dwellings) is supported as is the inclusion of the supportive policy to encourage Category 3 proposals, which will be supported in principle.
- 6.26 The objectives in the Table under section 2.1.10 – 5 Healthy Communities (2. Reduce and prevent crime and reduce fear of crime) and the specific policy in LP22: Achieving

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<sup>5</sup> [http://fingertipsreports.phe.org.uk/health-profiles/2016/e07000009.pdf&time\\_period=2016](http://fingertipsreports.phe.org.uk/health-profiles/2016/e07000009.pdf&time_period=2016)

Design Excellence “Be designed to reduce crime and create safe environments” are supported, however there is no standard set on which to judge an application.

#### Gaps

- 6.27 Policy LP22: Achieving Design Excellence Secure by design reference could be made to the “secure by design” standard.

#### **Connectivity and Land Use Mix**

- 6.28 The Parking Provision Standards include cycle parking which is supported, however the parking standards seem to favour the car over cycle parking, the balance should be changed to require more cycle parking, over car parking.

#### Gaps

- 6.29 The D1 use class (health centres etc.) may need additional space for ambulance(s) or other large vehicles in addition to car parking and cycle parking as the model of services delivered from these use class changes the parking requirements may also need to change. The model used “parking spaces per consulting room” may no longer be fit for purpose as the model of health care is shifting towards combined surgeries/health centres etc. and co-located services. Appropriate advice should be sought from the Cambridgeshire and Peterborough Clinical Commissioning Group, NHS England, Cambridge Community Services and Cambridgeshire and Peterborough Foundation Trust.
- 6.30 Policy LP14 “The development would be accessible by a choice of means of transport (including public potential traffic implications” needs to be stronger to encourage any out of town shopping to be accessible by active transport means.

#### **Healthy Ageing**

#### Gaps

- 6.31 The plan would benefit from the inclusion of a supportive policy to encourage street furniture for older people, e.g. benches. At present only the site specific policy for Fordham2 “Provision of additional seating around village” has this requirement.

#### **Housing and Space Standards**

- 6.32 Policy LP22: Achieving Design Excellence Create visual richness through building type, height, layout, scale, form, density, massing, materials and colour is supported.
- 6.33 Policy LP24: Renewable and low carbon energy development - Renewable energy proposals which will directly benefit a local community, have the support of the local community and / or are targeted at residents experiencing fuel poverty is supported.



## Gaps

- 6.34 The plan would benefit from the inclusion of a policy on minimum room sizes. Adequate space provides personal privacy and can reduce depression, anxiety and stress, giving children room to play and a good night's sleep. Cramming of different activities (studying, socialising, and relaxing) into limited space may adversely affect family life, creating a difficult dynamic which may play a part in the breakdown of relationships<sup>6</sup>. A lack of private study space for children is associated with underachievement. There is strong evidence that children with better quality homes gain a greater number of GCSEs, "A" levels and degrees and therefore have greater earning power. This has also been linked with an increase in anti-social behaviour. Children especially, teenagers deprived of adequate space at home may be disruptive and aggressive. In addition, low space standards contribute to poor health and low educational attainment that can express itself in incidences of antisocial behaviour. It is important to create minimal space standards, similar to the London housing minimal space standards, which is based upon the Park Morris standard<sup>7</sup>.
- 6.35 The plan would benefit from the inclusion of supportive text or a policy on the design of housing tenures. The text/policy should include concepts of: location and mix of housing tenures i.e. to pepper pot affordable housing with market housing or not; "one front door" etc.

## **Access to Fast Food**

### Gaps

- 6.36 The plan should include a policy to limit either the location of fast food outlets near sensitive receptors e.g. schools, workplaces etc. and/or the density of fast food outlets near sensitive receptors. Excess weight in adults is significantly worse than England average<sup>8</sup>.
- 6.37 Local Authorities with a local plan policy on fast food outlets have used a distance of 400m to define the boundaries of their fast food exclusion zone, as this is thought to equate to a walking time of approximately five minutes. However, in Brighton and Hove this was found to be inadequate to cover the areas actually used by pupils: an 800m radius is used as it covers significantly more lunchtime journeys<sup>9</sup>.

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<sup>6</sup> <http://cambridgeshireinsight.org.uk/joint-strategic-needs-assessment/current-jsna-reports/new-housing-developments-and-built-environment>

<sup>7</sup> <http://cambridgeshireinsight.org.uk/joint-strategic-needs-assessment/current-jsna-reports/new-housing-developments-and-built-environment>

<sup>8</sup> [http://fingertipsreports.phe.org.uk/health-profiles/2016/e07000009.pdf&time\\_period=2016](http://fingertipsreports.phe.org.uk/health-profiles/2016/e07000009.pdf&time_period=2016)

<sup>9</sup> <http://cambridgeshireinsight.org.uk/joint-strategic-needs-assessment/current-jsna-reports/new-housing-developments-and-built-environment>

## **Health Inequalities**

- 6.38 Policy LP19 which considers the loss of community assets is welcomed as is the approach to the provision of new community facilities.

### Gaps

- 6.39 The phrase “Be implemented, as appropriate, at an early stage of the phasing of development” in the second but last bullet of policy LP19 lacks clarity. The supporting text should make reference to a process to agree what “an early stage” means e.g. through section 106 agreements linked to occupation levels. The timescale for “an early stage” should not be left to the applicant/developer to decide.
- 6.40 One of the findings from the learning from Cambourne report is to provide and incorporate community buildings in the earliest stages of the development. One of the challenges for new communities is not having facilities such as community halls, pubs, youth clubs and sport provisions for early residents to benefit from. There also needs to be provision for younger children such as play areas, skate parks etc. It was noted that the small skate park built was not particularly well lit, which discouraged children from using it.
- 6.41 Loneliness and mental health problems were issues coming out of Cambourne partly due to the initial lack of community buildings. It is important to recognise that that people moving into communities may be moving away from their traditional support systems i.e. family and established communities with provisions to meet people and friends. Further information on the learning from Cambourne report can be found in the 2010 New Communities JSNA (<http://www.cambridgeshireinsight.org.uk/cambridgeshire-jsna/new-communities>).

## **Access to Health Services**

- 6.42 There are three site specific policies relating to enhancing or expanding health facilities (Ely 2– enhanced health facilities, including the Princess of Wales Hospital, Soham9 – extension to staple medical centre, and Sutton2 – Expand GP medical service provision). The Cambridgeshire and Peterborough Clinical Commissioning Group and NHS England should be consulted on these proposals to ensure they fit with the local “health system model for primary care” and the Sustainability and Transformation Plan (STP).

### Gaps

- 6.43 There will be a cumulative impact on health services with the totalling of the smaller sites and as such the Infrastructure Development Plan should take the cumulative impact of the smaller sites into account.

## **7. TRANSPORT**

### **Strategic Transport Assessment**

- 7.1 There is a need for an assessment of the overall impact of all the proposed development sites and the cumulative impact these may have on the transport network in both East Cambridgeshire and further afield. This assessment should provide evidence to demonstrate that the proposed growth scenario is the most sustainable, including on transport grounds. The “Site Assessment Evidence Report” does this to some extent on a site by site basis but does not provide any strategic transport analysis to support the preferred strategy.

### **More detailed comments**

- 7.2 The Vision set out in section 2.2 is broadly consistent with the Local Transport Plan 3 for Cambridgeshire and the emerging Transport Strategy for East Cambridgeshire.

### Policy LP3 Settlement Hierarchy

- 7.3 A number of settlements have been included as ‘large’ villages in the settlement hierarchy set out in Policy LP3. Within this a large village, amongst other things, is characterised by having good public transport links. However, a number of the large villages and one of the main settlements have very limited public transport options which does not make them suitable for regular journeys such as commuting to work. Existing bus services, especially in rural areas, are dependent on decreasing public subsidy which threatens the viability of these services.

### LP8 Enterprise Zone and Other Strategic Employment allocations

- 7.4 The allocation for the Enterprise Zone at Lancaster Way and other strategic employment sites will be major trip generators with potential to have significant impacts on the transport network. Consequently it will be necessary for applications for planning permission to be supported by a transport assessment to consider the cumulative impact of the proposed development across East Cambridgeshire and neighbour authorities.

### East Cambridgeshire’s Transport Network

- 7.5 Paragraph 5.3.4 should also make reference to the emerging Transport Strategy for East Cambridgeshire and the County Council’s Transport Investment Plan which includes a schedule of the projects included for implementation across the district.

### Policy LP18 Improving Cycle Provision

- 7.6 The reference to the Market Town Transport Strategies in the penultimate bullet in this policy should be deleted as in East Cambridgeshire this has been replaced by the Transport Strategy for East Cambridgeshire.

### Policies for Places (Chapter 7)

- 7.7 A number of settlements are proposing improvements to public transport links, most notably bus services. Generally it is going to be difficult to support improved bus services unless they can be provided commercially which would normally be achieved through significant increase in fare paying patronage or through increased public subsidy. Given the scale of development proposed in many of the large and medium village, which would generally benefit from enhanced public transport, this will be a challenge.
- 7.8 The objective in many settlements to improve walking and cycling facilities and connectivity is welcomed.
- 7.9 The proposal for the provision of the A11/A14 link road at Kennett (Policy Kennett 2) will require further technical and cost investigation and would have to be linked to new development at Kennett.

### Parking Provision Standards (Appendix B)

- 7.10 Stronger statements could be made around cycle parking and facilities being provided for cyclist such as changing rooms and showers at employment locations. The requirement for cycle parking should be strengthened with reference not only to the provision of parking spaces but also to include the quality of the provision, such as covered, secure and lit parking areas. These are necessary to raise the attractiveness of cycling and support modal shift.
- 7.11 Details and requirements for car and cycle parking at railway stations should also be provided.