

APPENDIX 1 TO CABINET PAPER ON THE SOUTH CAMBRIDGESHIRE LOCAL PLAN ISSUES AND OPTIONS CONSULTATION JULY 2012

EXECUTIVE SUMMARY

This Council welcomes the opportunity to comment on the South Cambridgeshire Local Plan Issues and Options Report and be involved in its preparation. We support sustainable development which will contribute to the continuing sustainable growth of the Cambridgeshire economy. However, where necessary, issues of strategic importance which require further consideration have been raised.

The relationship between the Transport Strategy for Cambridge and South Cambridgeshire and the emerging South Cambridgeshire Local Plan will be particularly important. Objectives set out in the Issues and Options Report which link development with sustainable transport fit well with the objectives that are proposed in the Transport Strategy.

The County Council supports the aspiration of the Plan to ensure sufficient employment land is available in the right places to support the economy and also to address the issues which underpin economic development including strategic infrastructure.

Robust viability testing of major site allocations should be completed. The planning of schools infrastructure, particularly secondary school provision, needs to be undertaken at a strategic level, taking into account the Plan for the whole of the area. This Council requires that additional housing sites identified through the Issues & Options process provide sites for new school provision in addition to any financial contributions towards education provision.

There are a number of cross-boundary issues to consider in the Northern Fringe East and this Council in its capacity as the Waste and Mineral Planning Authority looks forward to working with SCDC on the detailed planning of this area.

PROPOSED RESPONSE

Chapter 2 Vision

Issue 1: Vision

Subject to addressing the clarification required, this Council supports the vision for the future of South Cambridgeshire contained in the report. We suggest it includes a reference to the efficient use of natural resources and sustainable low carbon economic growth. This vision also needs to address the sub-regional dimension of how this plan is integrated with the emerging Cambridge City draft plan, to ensure this effectively addresses both the “duty to cooperate” and more importantly plans for the infrastructure requirements of the wider area.

Issue 2: Objectives

We suggest including a specific reference to clean tech and growing the green economy within Point ‘A’.

We agree with the need to link development to local facilities and services, and sustainable transport. In this context we request that library service provision be included specifically in the *“range of services and facilities that support healthy lifestyles and wellbeing for everyone”* listed in bullet point F.

Chapter 3 Development Needs

Issue 3: Jobs Target

We support the medium jobs growth target (23k). This is still somewhat optimistic when compared with the EEFM 'lost decade' forecast of a growth of 17k jobs in the period whilst being a little below the baseline (25k) and high migration (31k) forecasts. However the middle option enables the local authorities to be positive about the growth and job prospects for the area over the period, given little growth over the last couple of years and uncertainty at least for the next few.

Chapter 4 Spatial Strategy

Issue 12: Green Belt Locations

In the event that any change is made to the Cambridge Green Belt in Cambridge South the opportunity to address the outstanding need for a new Household Recycling Centre (HRC) to serve new and existing communities should be taken.

The need for new HRCs is generally taken forward through allocations made in the adopted Minerals and Waste Site Specific Proposals Plan 2011. The exception is the area of Cambridge South. Whilst a site specific allocation was proposed for a new HRC to serve Cambridge South the planning Inspector who considered the Minerals and Waste Plan at an independent Examination concluded that the allocation was unsound, principally by reference to lack of consistency with national planning policy with respect to Green Belt and the Historic Environment. The proposed allocation was therefore removed from the Plan, and the Inspector advised that the local planning authorities concerned (i.e. Cambridgeshire County Council, Cambridge City Council and South Cambridgeshire District Council) should work together to identify a suitable site for a new HRC to serve Cambridge south.

This Council looks forward to working together to find a site for the essential HRC infrastructure which will serve the existing and new communities of Cambridge south.

It is noted in paragraph 4.35 that the impact of the Guided Busway on villages along the route was investigated. Oakington, Longstanton and Over are said to perform relatively poorly in terms of the current services and facilities. These villages have not been given a higher status despite now being accessible to the Guided Busway. Over the life of the Plan there is potential for services and facilities to be enhanced and the proximity to the Guided Busway should be afforded greater weight as part of a criteria based approach towards growth along strategic public transport corridors between Peterborough, the Enterprise Zone at Alconbury, and Cambridge.

Issue 13: Rural Settlement Categories

Changes to the location of particular villages within the Rural Settlement Categories could have a potential impact on the existing pattern of library provision throughout South Cambridgeshire. The concept of a hierarchy of rural settlement categories corresponds with the County Council's Service Levels Policy for library service provision which is similarly based on a hierarchy of provision linked to population catchment sizes.

An existing library may need to be moved to a more suitable location, larger premises or shared premises, in order to meet the needs resulting from housing development(s) in its local catchment communities. Our comments in reply to Question 81 on the recently adopted County Council policy favouring the delivery of library services via community hubs are also very relevant in this context.

Issue 14: Scale of Housing Development at Villages

The need to review existing library service provision applies to this question. In addition, the cumulative impacts of a number of windfall developments can be significant in the provision of school places. We support the Local Plan in making an allowance for this type of development to provide some basis on which to plan service provision.

Issue 15: Approach to Village Frameworks

The principle of neighbourhood plans is supported. The District Council will need to give consideration as to how neighbourhood planning is able to properly support and a commitment in the Local Plan to do this would be welcome.

In the classification of villages for the purposes of development it is recommended on sustainability grounds that those with an existing secondary school are better placed to grow than those without. CCC supports this up to a point. However, the assessment needs to be refined and look not only at the existence of a secondary school but the availability of spare capacity within it and its potential for expansion on its current site.

The numerical limits by category of village appropriate seem arbitrary. We suggest it should be more a case of identifying levels of development required to sustain local services on a case by case basis e.g. village school, shop, pub, etc.

Village frameworks should relax restrictions on certain categories of development beyond the existing built envelope. School sites are large and if a new or expanded school is required to serve a village community it is unlikely that a space of sufficient size now enjoying planning protection is going to be available. Also, improving the schools estate and relocating existing provision from cramped old village school sites is not possible because of the unavailability of a site to relocate to.

The increased likelihood of sporadic development will have a negative impact of an ageing population. These developments will not necessarily have the appropriate public transport links thus leaving older people more isolated which we know has a detrimental impact on the quality of their lives and undermines their physical and mental health.

Chapter 5 Development Options

Issue 16: Development Options

Any new settlement will require new static library provision on site, which is in line with this Council's policy on 21st Century Library Service and its Service Level Policy for the scale of library service provision.

At Waterbeach (site 231) a large proportion of the site lies within the sand and gravel MSA. The site lies in an area where the local mineral resource is economic and has/is being extracted. However, the potential loss of this significant mineral resource at this site is not identified in the conclusions of the Tier 1 assessment (within the SHLAA) as a 'strategic constraint'. It should also have featured as a 'con' under the New Settlement site options (page 61 of the Issue and options Report), so that an accurate and informed debate on the merits of taking the site forward could be held. This element of the SHLAA Assessments needs to be re-visited and adequate consideration of the mineral resource needs to be taken into account.

We see Bourne Airfield (site option 5) as an extension of Cambourne. It is only separated from Cambourne at present by the Broadway, a C class road. As an extension to Cambourne it could benefit from existing infrastructure (e.g. a new secondary school which is capable of being expanded) rendering it more viable and,

therefore, more likely to be delivered. A 3000 house development on Bourne Airfield is unlikely to support a viable secondary school serving that development alone.

Chapter 6 Climate Change

Issue 17: Mitigation and Adaption to Climate Change

A policy on air quality/emissions is appropriate. For many developments, the transport patterns of end users can be a very significant contributory factor to air quality problems. It should be noted that air quality issues resulting from a development's transport users will often occur a significant distance from the development.

Issue 18: Renewable and Low Carbon Energy Developments

We suggest identification of appropriate broad locations for alternative energy generation - this could include for example solar, biomass combined heat and power (CHP) and or anaerobic digestion.

The scale of renewable energy delivery the Local Plan needs to facilitate to secure local energy supplies is of a significantly bigger scale than any previous plans will have facilitated. In the same way as housing is planned, local energy generation needs the same process if there is a true ambition to provide greater security of energy for communities and businesses as competition for fossil fuels on the global markets grows forcing up prices.

Issue 19: Renewables in New Developments

We suggest amending the relevant text in the first paragraph to read: "no more than 10% of a building's energy requirements be provided from micro technologies". This makes clear that site wide solutions could deliver more than 10%.

Potentially, new homes and buildings will need to provide onsite or offsite renewable energy to certain levels and it is this provision over and above the requirements that will come through via zero carbon policy. If so a minimum of 10% seems acceptable on site if this is over and above national zero carbon policy for new homes.

Issue 20: Community Energy Fund

We support the setting up of a Community Energy Fund.

Issue 21: Sustainable Design and Construction

We support the proposal (Option 43) that nationally described sustainable construction standards developed for both new homes (the Code for Sustainable Homes) and new non-domestic buildings (BREEAM) should form the basis of new planning policy. The issue of Whole Life Costing could be introduced here to help inform the building standards. We support complying with sustainable building standards (Code Level 4 and BREEAM - excellent - there are already good examples across the country of excellent buildings). We also support the zero carbon standard being required for large scale developments; a precedent is already set through Cambridge Northern Fringe.

Issue 22: Sustainable Show-Homes

We support developments providing a sustainable show-home but we stress that this should include a whole life costing.

Issue 24: Water Efficiency of New Housing

We support option "iii.". Considering the planned growth in Cambridgeshire, climate change predictions and the precautionary principle, including water efficiency is a

sensible approach to dealing with potential future water scarcity and the variety of demands we make on water.

Chapter 7 Delivering High Quality Places

Issue 29: Public Art

We support the concept that public art should include the design of functional elements of new buildings.

Chapter 8 Protecting and Enhancing the Natural and Historic Environment

Issue 32: Biodiversity

This identifies the correct approach for achieving the protection and enhancement for biodiversity and geodiversity. However, this approach should also ensure that the mapping of local ecological networks considers wildlife corridors and stepping stones that connect them and areas identified by local partnerships for habitat restoration or creation (as set out in section 117 of NPPF).

There should be recognition of the importance of preserving brownfield sites for nature conservation. While effective use of brownfield land should be encouraged, this should not be at the cost of any high environmental value, e.g. biodiversity or geodiversity interest (see Core Principles, section 17 of the NPPF).

We strongly support the provision for the Local Plan to protect and enhance biodiversity and geodiversity because it is an important aspect of sustainable development, as identified within the National Planning Policy Framework (NPPF).

In answer to question “B”, we believe the Biodiversity Supplementary Planning Document should be retained in order to facility compliance with the planning policy and legal duties the council has to have due regard to the conservation of biodiversity (NERC Act 2006) and the Habitats Directive.

Issue 33: Green Infrastructure

In answer to question “A”, we believe the Local Plan should include a policy requiring development because it is an important aspect of sustainable development and would address the core principles set out within the National Planning Policy Framework for Local Plans. The policy would also ensure appropriate Green Infrastructure is provided as part of developments.

In answer to question “B”, we believe the Local Plan should assist in the delivery of Green Infrastructure projects identified within the Cambridgeshire Green Infrastructure Strategy. In addition, we recommend that the Local Nature Partnership and the Green Infrastructure Forum be contacted to discuss potential additional projects.

Issue 42: Heritage Assets

We support the inclusion of policies to protect and enhance the historic environment in the District Council’s Local Plan review. We consider that historic policy is required by the NPPF and that there are no reasonable alternatives to inclusion of appropriate historic environment policy.

Local Plan policy should consider all aspects of the historic environment including, designated assets (listed buildings, registered parks and gardens and Scheduled Monuments) and undesignated heritage assets of both architectural and archaeological significance. Undesignated heritage assets with archaeological

significance make up the majority of assets with archaeological significance and many archaeological sites undoubtedly remain undiscovered within the District.

The County Council's Historic Environment Team maintains the Historic Environment Record (HER) for Cambridgeshire. There are currently over 5800 undesignated archaeological monuments and over 1300 separate events recorded in South Cambridgeshire and more records are added as new discoveries come to light.

Local Plan policy should also recognise that where development is justified which leads to the harm of a heritage asset, developers will be required to record and advance understanding of the significance of any heritage assets to be lost in a manner proportionate to their importance and the impact, and to make this evidence (and any archive generated) publicly accessible (NPPF paragraph 141).

Chapter 9 Delivering High Quality Homes

Issue 46: Housing Mix – Housing Types

In line with national trends Cambridgeshire will be experiencing a significant rise in its older population over the next 10 years and beyond. National and local policy places an ongoing emphasis on enabling people to live in their own homes as long as possible. This would suggest that homes should be more easily adaptable to meet the needs of people as they grow older - so called life time homes - thus ensuring their independence but also ensuring they can remain connected to their local communities. New housing should also consider the direct application to care delivery through the use of assistive technology into home, e.g. remote health monitoring for people with long term conditions.

With people living longer and wanting to live in their own homes longer, there will be less dependence on residential and nursing care, which is likely to focus more on those older people reaching the end of their lives. Sheltered and extra sheltered housing schemes are likely to remain a feature of the housing landscape for older people but what this looks like and how this is integrated into community settings may alter.

A key consideration for future housing policy to address is the fact that social isolation for older people is the biggest single factor that contributes to poor health and wellbeing. Overall the plan needs to consider more strongly the needs of the aging population and the emphasis towards ensuring people can live in their homes longer. Also the over 65 population will become a significant part of the total population and are likely to be more demanding about the standard of housing, the built environment and the communities they live in including access to jobs, leisure and learning opportunities.

Issue 55 Working from Home

Working from home is increasing year on year as new technology advances to allow people both self employed and employees to work from home. Within the rural areas effective home working will be significantly assisted by the introduction of better Broadband capacity. A Working from Home policy would be supported.

Chapter 10 Building a Strong and Competitive Economy

Issue 58: Dwellings to support Rural Based Enterprise

We support a policy setting out the circumstances for new build to support rural enterprises.

Issue 59: New Employment Provision

We support the 2 further employment land proposals.

Issue 60: Employment allocations

We support a carry forward of existing allocations and inclusion of Longstanton site.

Issue 62: Occupancy Limitations

We support an amendment of policies to allow for greater flexibility in land-use and potentially the use of Local Development Orders in order to support existing and new clusters including high value manufacturing and high tech headquarters.

Issue 63: Promotion of Clusters

We support this approach; it is important from a perceptions perspective in affirming South Cambs support for the Cambridge high tech cluster.

Issue 64: Shared Social Spaces

The larger employment areas, particularly those some distance from other employment sites or Cambridge should be encouraged to consider social spaces as part of the development.

Issue 65: Broadband

The County Council strongly supports the inclusion of a policy that requires new developments to make provision for communications/broadband infrastructure which would reduce the demands on the transport network by providing improved home-working opportunities. New developments must be served by a high-quality digital infrastructure. Delivery of superfast broadband will be a key strand in helping to meet economic and social aims. It is appreciated that in more rural areas, superfast broadband provision is more challenging.

The new developments at Clay Farm and the Clay Farm parcels 19 & 20 incorporate provision for superfast broadband and this should provide a model for future new developments and allow us to ensure that new communities and developments build on existing successes such as Cambridgeshire's Quality Charter for Growth.

Issue 66: Established Employment areas in countryside

We support and encourage two additional areas to be included.

Issue 67: New Employment Development

We support amending policies to allow for the expansion of existing businesses (including farm diversification and the development of new tourist accommodation) and the creation of new businesses within villages and the countryside where deemed to be of an appropriate scale.

Issue 73: Tourist Accommodation

We support both allowing appropriately scaled accommodation for visitor and holiday accommodation in villages and conversion/redevelopment of rural buildings.

Issue 74: Tourist Facilities/Attractions

We support a policy allowing appropriate tourist facilities/attractions including in the countryside.

Chapter 11 Promoting Successful Communities

Issue 80: Health Impact Assessments

We believe these should continue on the basis that health and wellbeing issues are key to ensuring people live longer and have a greater quality of life in old age. Addressing health and wellbeing issues also helps those with mental health issues.

Issue 81: Protecting Village Services and Facilities

We question whether the alternative more detailed test is applicable to all the local services listed. For library service provision we recommend that a community impact assessment would be a more appropriate test.

We would also like to see consideration of the possibility of combining service provision through the establishment of community hubs as a way of underpinning viability and achieving efficiencies for a range of local community services by sharing accommodation and other resources. This is in line with the latest County Council policy for the delivery of a 21st Century Library Service which recognises the importance of developing community hubs where library services can be provided in shared buildings in partnership with other services.

This policy is already informing the planning and design of the new library facilities to provide access to books, IT-based resources, study facilities and lifelong learning in the community buildings proposed for the Southern Fringe and North West Quadrant.

Issue 82: Developing New Communities

We strongly support all the principles for service and facility provision set out in this issue. If a CIL is introduced we wish to see library service provision specifically mentioned on the infrastructure list of those items to be covered by the levy.

Issue 85/86: Ice Rink/Concert Hall

The accessibility of major community facilities by sustainable transport modes should be an important consideration in any decision on the location of such facilities. Locations should seek to minimise the need for travel by private car.

Issue 87: Open Spaces

We support the ongoing development of open spaces, but suggest that the positioning and design of these takes into account the needs of older people. Most open spaces are designed with children and young families in mind.

Chapter 12 Promoting and Delivering Sustainable Transport and Infrastructure

Issue 97: Planning for Sustainable Travel

Greater emphasis will need to be placed on reducing the need to travel by car where possible through locating future development in the most sustainable locations and changing travel behaviour in favour of sustainable alternative modes where possible. Our aim is to achieve this continuing to work together in an integrated way as we move forward with the development of our Transport Strategy in line with the Local Plans.

The existing public rights of way network should be protected and enhanced where affected by development. This is encouraged by paragraph 75 of the NPPF. Significant new developments should provide links to the wider public rights of way network. With such developments there should be an expectation of developer contributions, through section 106 or Community Infrastructure Levy, to improving the public rights of way network outside the red line area of the development. This would reflect the additional demand generated by development and mitigate some adverse effects. Planning decisions which affect public rights of way should take into account the County Council's statutory Rights of Way Improvement Plan.

Issue 98: Transport Assessments and Travel Plans

A policy requiring Transport Assessments and Travel Plans should be included in the plan.

Issue 99: How Car Parking is provided within Residential Developments

Affordable transport is vital to the health and wellbeing of older people and other vulnerable groups who do not always have access to their own car and have lower incomes. New developments should be connected to existing developments and facilities. In considering any changes to car parking standards, thought should be given to the impact of more older people driving and whilst not classed as 'disabled' might have restricted mobility and consequently may require wider parking spaces.

Issue 100/101: Allocation of Car Parking within Residential Developments/Residential Garage Sizes

In principle we support the inclusion of policies on parking standards. A design-led approach to parking within individual developments is suggested in addition to a minimum garage size with agreed dimensions. Further investigation and discussion of the options would be required, considering the results of the consultation and fit with the strategic approach in the draft Transport Strategy for Cambridge and South Cambridgeshire.

Issue 107: Provision of Infrastructure and Services

A policy regarding infrastructure provision is vital. The work on the emerging Cambridge and South Cambridgeshire transport Strategy will help inform the transport infrastructure that will be required to cater for growth.

Question 107: Provision of Infrastructure and Services

It is important that the Local Plan includes a policy to ensure development provides the appropriate infrastructure via planning obligations (S106) or the Community Infrastructure Levy – with the nature, scale and phasing of any infrastructure or funding sought being related to the size and form of the development and its potential impact.

We therefore strongly support the development of the Infrastructure Delivery Study (IDS) which the Council has commissioned in partnership with Cambridge City Council as the vehicle for systematically establishing:

- infrastructure needs - and costs - critical to the delivery of the Local Plan
- when and where infrastructure will need to be provided:
- the scale of funding needed to achieve this; and
- Potential sources of funding.

Chapter 13 Site Specific Issues**Issue 108 Cambridge Airport**

The option for retaining a policy on Cambridge East is preferred, and safeguarding the land for post plan development would be appropriate. However, this should not preclude other allocations within the area coming forward; or the option would be inconsistent with the principles of enabling sustainable development embodied within the NPPF.

The adopted Minerals and Waste Plan includes an allocation in the Cambridge East area for a Household Recycling Centre, a waste management facility e.g. materials recovery facility, and a temporary inert waste recycling facility (SSP Policy W1E).

Whilst the temporary inert waste management facility may not come forward unless the wider Cambridge Airport site is developed, the County Council's recent review of

its Household Recycling Centre strategy has confirmed that a HRC is still required in the Cambridge East area and there remains potential for a commercial waste management facility.

Issue 110 – Cambridge Northern Fringe East

The recently adopted Cambridgeshire and Peterborough Minerals and Waste Plan makes a number of allocations and designations in this area. A composite map showing the allocations and designations made in the Northern Fringe East is attached for your information.

Development and Deliverability of Proposals

There are a number of cross-boundary issues to consider in the Northern Fringe East and this Council in its capacity as the Waste and Mineral Planning Authority looks forward to working with Cambridge City Council and South Cambridgeshire District Council on the detailed planning of this area. As noted in the National Planning Policy Framework (NPPF) this should be a continuous process and one which results in the provision of land and infrastructure necessary to support current and future levels of development.

The allocations and designations made by the Minerals and Waste Plan will influence the vision for this area, and the type and location of development that may be achievable in the Northern Fringe East. One of the key tests of the soundness of any Plan is whether it is effective i.e. deliverable. The NPPF (para 173) addresses viability and deliverability of Plans. This matter is considered further below and although the Minerals and Waste Plan policies often refer to determining planning applications the thrust of these policies logically applies equally to making provision for development through local plan allocations.

Cambridge Waste Water Treatment Works (WWTW) and development within the Cambridge WWTW Safeguarding Area

WWTW are essential infrastructure for the delivery of sustainable communities. Finding suitable sites to accommodate works is difficult given the operational requirements that need to be addressed and environmental considerations, therefore the existing capacity needs to be protected in order that it can continue to meet the needs of the current and future population. A Safeguarding Area therefore extends 400 metres around the Cambridge WWTW, across a substantial area of the Northern Fringe East.

Any development which is proposed within the WWTW Safeguarding Area would need to be considered in the context of Minerals and Waste Core Strategy Policy CS31. Planning permission can 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.

Development within the Cambridge WWTW Site

Neither the WWTW new railhead, nor a waste management facility is likely to be compatible with residential development that is immediately adjacent.

Waste Consultation Areas

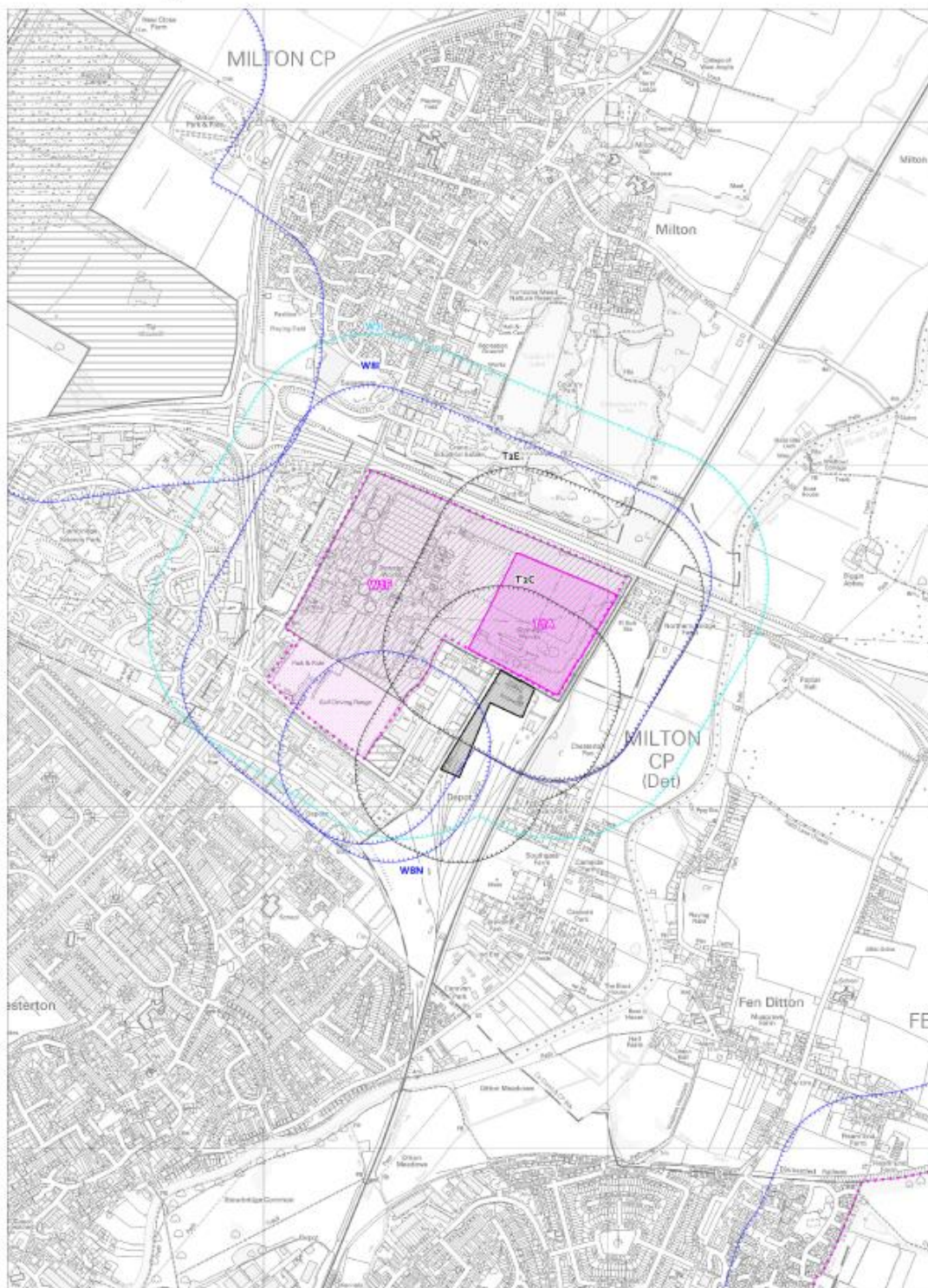
There are two Waste Consultation Areas designated in the Northern Fringe East designated through the adopted Minerals and Waste Plan, which seek to protect waste management facilities which make or will make a significant contribution in managing Cambridgeshire's waste. Within these Areas development can only be permitted where it is demonstrated that this will not prejudice existing or future planned waste management operations. (Core Strategy Policy CS30)

Transport Zones and Transport Safeguarding Areas

The Northern Fringe East is the only site with existing and proposed railheads which serves the Cambridge area. It is vital that this function is maintained for the future, especially given potential plans for improving the A14. The existing Lafarge railhead also has an ancillary coated roadstone plant, which occasionally operates at unsocial hours as materials are supplied for overnight road works/repairs.

Two Transport Safeguarding Areas protect existing and proposed railheads in the Northern Fringe East (in accordance with the requirement in the NPPF, para 143). Core Strategy Policy CS23 places a presumption against any development within these areas that could prejudice the existing or potential use of the Transport Zones for the transport of mineral and/or waste.

Chesterton Sidings Area - MW Allocations



Scale (at A3): 1:10,000
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Appendix 3 Village Categories

The table on page 259 distinguishes between CCC libraries and Library Access Points (LAPs) by calling the former "Full time" and the latter "Part time". This does not actually invalidate the proposals made but the designations are misleading. CCC libraries are run and fully funded by the County Council, whereas LAPs are volunteer run with support from both the County Council and local Parish Councils.