

Appendix 1

Consultation relating to the Cambridge City Local Plan Issues and Options Report
June 2012

Response from Cambridgeshire County Council DRAFT

Introduction

The Local Plan Issues and Options Report has been prepared to invite comments on key issues that have been identified and suggestions on policy options to address them, including options on the level of future housing and jobs provision and the identification of new broad locations for housing at the edge of Cambridge up to 2031. The document itself can be found using the following link: <http://www.cambridge.gov.uk/ccm/content/planning-and-building-control/planning-policy/local-plan-review/local-plan-review-issues-and-options-report.en>. The County Council has an extended deadline from the City Council to respond, given the dates set for Cabinet in the calendar. The questions posed in the consultation appear in bold.

The Council welcomes the opportunity to comment on the Issues and Options consultation document and has and will continue to work closely with the City Council and South Cambridgeshire District Council in developing planning and transport policies for the area.

Background

The current Local Plan for Cambridge was adopted in 2006. Under recent changes introduced in national legislation and planning policy, i.e. the Localism Act 2011 and the National Planning Policy Framework (NPPF) in March 2012, public bodies have a Duty to Cooperate on planning issues that cross administrative boundaries, particularly those that relate to strategic priorities. The County Council notes paragraph 156 of the NPPF which states that local planning authorities should set out the strategic priorities for the area in the Local Plan.

The County Council will focus upon the strategic issues which are of fundamental importance to the integrated planning and delivery of County Council strategic objectives and priorities for services such as waste, education, libraries, flooding and water management, economic development, archaeology, public health, adult social care and transport.

Procedural considerations

The review of Local Plan will take approximately three years, with adoption expected in April 2014. The detailed calendar for the work can be found by using the link below. There will be another formal consultation this autumn. The consultation programmes for the City and SCDC were agreed in November 2011; these were to have been aligned but the engagement programme for SCDC then slipped.

<http://www.cambridge.gov.uk/ccm/navigation/planning-and-building-control/planning-policy/local-plan-review/>

Structure of the Issues and Options Report

There are 12 chapters in the Report. These are as follows:

1. Introduction
2. Vision
3. Spatial Strategy
4. Strategic Spatial Options
5. Opportunity Areas
6. Sustainable Development, Climate Change, Water and Flooding
7. Delivering High Quality Places
8. Protecting and Enhancing the Historic and Natural Environment
9. Delivering High Quality Housing
10. Building a Strong and Competitive Economy
11. Promoting Successful Communities

12. Promoting and Delivering Sustainable Transport and Infrastructure

Each chapter has a series of questions related to the options under consideration, an example appears below:

- **Is there a need for a policy addressing this issue?**
- **Are there any points which may have been missed out and you feel should be added (perhaps even an entirely new option)?**
- **Are there any other reasonable alternatives that should be considered?**

The questions posed in this report appear in **bold** for ease of reference, as shown above

Chapter 1

This chapter describes the changes in national planning system since the current Local Plan was adopted. It also highlights the aims of the last plan, the release of land from the green belt for strategic growth and the relationship of the Local Plan to the 2003 Cambridgeshire and Peterborough Structure Plan and the Regional Strategy. The sites released for growth under the 2006 Local Plan are either being developed or are at outline planning stage.

Chapter 2

This chapter describes the Vision and strategic objectives for Cambridge towards 2031 and highlights the Vision for the 2006 Local Plan. In essence, what are the elements that should now act as key drivers for growth and continued success of the city? The vision would be related to the following principle “..growth presents many challenges, it also presents an opportunity to support the development of Cambridge as a more sustainable low carbon city with a thriving economy, which embraces its past while also looking to the future.”

Question

2.1 What are your views about the proposed vision for Cambridge? Does the vision presented above cover all the right elements or have we missed anything out?

The County Council supports the Vision you have set out for Cambridge towards 2031 as it appears in Option 1. The Cambridge area already has a world class reputation as a leader in education, research, and innovation, all of which are fundamental to maintaining the momentum of economic growth so significant for Cambridge itself and the UK economy as a whole. A clear focus on those strategic objectives and priorities which maintain and enhance economic growth is essential to meet the needs of our residential and business communities over the life of the Plan. The Local Plan should aim to support the competitive edge that Cambridge currently enjoys as this is vital in attracting further inward investment in strategic infrastructure and in supporting projects/proposals which enhance the quality of life in our communities, and particularly for those who require additional support.

In particular we welcome the objective to minimise the need to travel, and make walking and cycling the first choices of travel, and intentions to make it easy for everyone to move round the city and to be able to access jobs and essential services. This chimes well with the objectives set out in the both the Third Local Transport Plan (LTP3) and the Draft Transport Strategy which we are developing for Cambridge and South Cambridgeshire at the same time.

Our aim is to work in an integrated way with our partners in City and South Cambridgeshire to ensure that our transport policy, including the Local Transport Plan and the emerging Transport Strategy for Cambridge and South Cambridgeshire and the Local Plans fit well together and promote a sustainable pattern of development. The location of future growth and employment is critically important to ensure it is sustainable and the need to travel is reduced where possible.

Accommodating future growth to support a thriving city centre in an environmentally sustainable way at the same time as managing the demand for travel is a complex balance

to strike but one that must be achieved in order to ensure the continued growth and prosperity of Cambridge. 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 behavior in favour of sustainable alternative modes where possible. Our aim is to achieve this by 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.

We support policies in the plan aimed at ensuring new developments in Cambridge are integrated well with the sustainable travel network and that sustainable transport routes are protected and that development is located and designed to reduce the need to travel and help promote travel behaviour change away from the private car.

Chapter 3

This chapter explains the approach to the scale of growth for both housing and jobs, and the broad locations, some of which are in South Cambridgeshire. Comments on the merits of broad locations will not be given until the work on the capacity studies is finished and available in both local authority areas.

The four options for housing over the life of the Plan range between 12700 and 25000 new homes, those at the upper end would rely on further changes to the green belt. The three options for employment are 10000, 15000 and 20000 new jobs over the life of the Plan.

Level of housing provision

Questions 3.1 Need for a policy addressing for an appropriate level of housing provision? ; and Questions 3.3 Are there any points which have been missed...?

The County Council **supports** the City Council in considering the full range of options to support housing provision therefore.

The 2011 Census data indicates **unmet need** not previously identified, by virtue of the discrepancies between the ONS annual mid year population estimates and the population enumerated in March 2011. Cambridge's 2011 census population is 15.1% higher than the most recent ONS projections; while in London, Brent's population is 12.6% higher (35,000 people) and Leeds has a negative difference of around 37,000 people. The Cambridgeshire Research Group population projection for Cambridge City for 2031 is 151,000.

In line with national trends Cambridgeshire will be experiencing a **significant rise in its older population over the next 10 years and beyond. This increase is more marked in certain age bands than others**, in particular for people of 90 and over. The increase will also be more significant than originally thought in Cambridge City based on the emerging 2011 census data. 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, unlike previous generations, are likely to be more demanding about the standard of housing, the built environment and the communities they live in including access to work, leisure and learning opportunities. Further discussion with Adult Social Care and Community and Adult Services is welcomed.

The County Council has responded previously to the City Council's Strategic Housing Land Availability Assessment (SHLAA), highlighting concerns about availability of potential school sites within Cambridge. Following a period of relatively stable, even declining birth rates, **in recent years the birth rate across the County has increased dramatically. This is especially noticeable in Cambridge City**, where forecasts suggest that, in comparison to current numbers, primary school rolls will be 26% higher in five-years time and 46% higher than present in ten-years time. This dramatic increase in demand is predominantly a result

of an increased birth-rate, and the impact of major housing development in and around Cambridge yet to be felt. Further housing development, over and above those development sites already allocated will further increase the number of school places the Council needs to secure. The allocation of a further 2,000+ homes, as identified within the SHLAA, could lead to additional demand for between 500-700 primary school places, in addition to the current significant increase in demand, identified above.

In response to the dramatic increase in birth-rates, the County Council has already increased primary school across the City, with the expansion of existing schools (through a combination of temporary provision ahead of permanent provision being secured) as well as opening the new 420 place, 2 form of entry (FE), Queen Emma Primary School. These changes together with others already planned mean that the scope for accommodating additional need on existing school sites may be constrained. It is critical, therefore, that in addition to securing capital funding from developers, the SHLAA and Local Plan process identify suitable sites through which additional capacity should be secured.

It is worth highlighting, as identified in the detailed comments, that one limiting factor in securing additional capacity may include the allocation of school sites as protected open space within the Local Plan. School sites are protected, in terms of amenity and sports provision, by Sports England requirements and those specified by Government in respect of delivering the education curriculum. The Council considers that also identifying school sites as protected open space is, therefore, unnecessary.

Overtime, this increased demand for primary school places will create additional demand for secondary school places within the City. The Council has already identified a need to undertake a strategic review of secondary school provision across the City, beginning in the Autumn 2012. This will include examining where additional provision can be provided from September 2015 onwards.

The County Council, as the local children's services authority, has responsibility for the commissioning of post-16 education and training. In 2010/11 the County Council undertook a review of post-16 provision across Cambridgeshire. This review, "The Cambridgeshire Education and Training Capacity Review 2011-2025", took account of demographic changes and the impact of housing development allocated within the District and City Councils Local Plans at the time.

As the scale and extent of development proposals are confirmed the finding and conclusions from the Review will be updated. As post-16 provision is planned on a sub-regional basis, in comparison to the planning of other education provision, a key consideration will be the impact of development proposals in neighbouring Councils Local Plans. This should be reflected in any planning policies used to secure developer contributions towards post-16 education provision.

The likely impact of additional housing development will be monitored, using the methodology set out with in the Review. However, until further detail around potential development is available, it is not possible to determine the likely demand for additional provision.

The Council is aware that existing secondary school sites offer limited scope for significant expansion, and consideration may need to be given to alternative approaches to securing the additional places required.

In addition, any additional housing allocations above the SHLAA and existing allocations will need to contribute towards education provision, through capital contributions, as well as, in

appropriate sites. With the move towards use of CIL instead of S106 agreements, it is important that appropriate sites are identified and allocated within the Local Plan.

The size of development sites will determine whether contributions will be used for on-, or off-site education provision. In the majority of cases, larger development sites will allow opportunities for on-site primary school provision. Secondary school provision may need to be provided across a number of sites, depending upon their size. In addition, developments will need to provide education contributions towards early years provision. This will in many cases be provided at new primary schools, but alternative arrangements may be needed, which may require on-, or off-site, provision.

In summary, it is considered that there does need to be a policy covering the level of development that will be expected during the plan period. Without this it would be far more difficult, if not impossible, to effectively plan service provision and especially plan school place provision, given the land take required, across the City.

,Alongside this, if a decision is taken to release land from the greenbelt , there is the possibility of designating safeguarded land to meet longer term development needs stretching beyond the plan period . Although it is accepted that development will be phased throughout the plan period, it is critical that, from the outset, it is possible to plan for the pattern of County Council service provision and how this may develop in response to the level of development proposed and possibly after 2031. (NPPF para 85)

Level of employment provision

Questions

3.5 Is there a need for a policy addressing this issue?

3.6 Which of the policy options do you prefer?

3.7 Are there any points which have been missed and you feel should be added (perhaps even an entirely new option?)

3.8 Are there any other reasonable alternatives that should be considered at this stage?

The County Council supports the median range of 15000 new jobs but recognises that the existing labour market is a function of the availability of good quality affordable housing and supporting infrastructure. Where there are housing and transport deficits, these issues have to be resolved across wide geographical areas, which cross over administrative boundaries.

The Employment Land Review (ELR) from 2008 carried out by both the City Council and South Cambridgeshire District Council identified that much of the supply of employment land was not in Cambridge. The update to the ELR this summer is therefore fundamental to our understanding of the optimum alignment between employment provision, housing and supporting infrastructure. The choice of sites for investment purposes by potential and existing employers is often influenced by accessibility to transport hubs and congestion free routes.

The County Council fully acknowledges the national policy presumption in favour of sustainable development. The County Council is mindful of paragraph 8 of the National Planning Policy Framework, "...to achieve sustainable development, economic, social and environmental gains should be sought jointly and simultaneously through the planning system." It is considered that the choices made at this stage will need to be flexible to take account of changes in the evidence base across different geographic areas, for example the Travel to Work Area and the area covered by the Strategic Housing Market Assessment. This wider perspective should draw upon data from the 2011 Census.

Regardless of the level of housing development set out in the plan, it is important that, as part of employment schemes, the need to secure appropriate childcare provision is included. Ensuring that appropriate levels of childcare provision is located close to major employment

hubs plays an important part in the Council meeting its responsibilities in providing access to sufficient provision. Ensuring a balance of provision close to employment as well as residential areas is an important way of promoting sustainable development, minimising unsustainable travel and promoting parental choice.

Chapter 4

This chapter looks at further strategic issues and options which will contribute to the spatial strategy for Cambridge.

This includes a strategic approach for the enhancement of biodiversity and green infrastructure.

Green infrastructure Option 22

Question 4.4 Is there a need for a policy addressing this issue?

The County Council **supports** the need for a policy as a Strategic Priority

Question 4.5 Are there any points which have been missed?

The current wording is focused on green spaces. This consideration should be extended to other aspects of green infrastructure, including rights of way, heritage sites and water bodies.

The policy should provide a stronger commitment to ensure new development proposals to link together green networks, wherever possible. Such contributions would also contribute positively to the biodiversity value of the green space. Plans for biodiversity should be made at landscape scale across local authority boundaries (NPPF para 117)

The draft Cambridgeshire Health and Wellbeing Strategy 2012 -17, Section 5, refers to the priority of creating a sustainable environment in which communities can flourish . The use of green open spaces can contribute to health and wellbeing. The current consultation on the Health and Wellbeing Strategy ends on 17th September.

A cross reference to another Strategic Policy Option 163 A green and pleasant city with vibrant and culturally diverse neighbourhoods and to Policy Option 82 could also be considered. Policy 82 – Support for strategic biodiversity enhancement proposals is deemed not to be a Strategic Priority, and the County Council suggests there is merit in changing the status to allow a for consistent approach for the assessment of schemes.

Further consideration could be given to the promotion of public rights of way (NPPF para.75)

The options for General Pollution Policy (84) Air Quality (85) and Noise (86) Water Quality (58) all contribute towards health and well being and there is value in highlighting these options, particularly those embraced by EU Directives. (NPPF paras.17,69)

Under Part 2 of The Localism Act Ministers have been given the power to require public authorities to make payments in respect of certain EU financial sanctions arising from infractions of EU law. The EU Directives which apply most directly to the County Council are Waste, Waste Water, Water, Integrated Prevention and Pollution Control (IPPC), Floods and Landfill. Para. 2 of the NPPF states that “Planning policies and decisions must reflect and where appropriate promote relevant EU obligations and statutory requirements.”

STRATEGIC PRIORITY

Option 24 – City Centre

Question 4.10 Is there a need for a policy addressing this issue?

The County Council **supports** the importance placed through Option 24 - City Centre on maintaining and enhancing the vitality and viability of the city centre and emphasise the key contribution which the Central Library makes in relation to the community, cultural and

economic aspects of this, as the most heavily used public building in central Cambridge. 853,979 visits were made to the Central Library during the year April 2011 – March 2012.

The County Council fully supports the acknowledgement which the report gives to the Portas Review's emphasis on *"the need to breathe economic and community life back into our high streets. The idea is that they become destinations for socialising, culture, health, wellbeing, creativity and learning, and that shopping is just one small part of a rich mix of activities"* (paragraph 4.40). Library services have a key role to play as part of that mix of activities, which will develop even further as the service works with partners to deliver joined up services in community hubs.

STRATEGIC PRIORITY

Hierarchy of town centres

Option 26 – Change the position of some centres in the hierarchy

Question 4.17 Is there a need for a policy addressing this issue?

The hierarchy of town/local centres referred to in paragraph 4.46 could have a potential impact on the pattern of library provision throughout the city. The County Council **supports** Option 26 which proposes that changes could be made to the position of some of the local centres – both position within the hierarchy and physical location - and that new centres be added, including the ones proposed at Clay Farm and NIAB. We agree that this would reflect the growth that has taken place in some centres and there would be a stronger focus on key centres. A policy for this would be very helpful to support their management and growth over time. The concept of a hierarchy of local centres 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.

STRATEGIC PRIORITY

Option 33 Northern Fringe East

This option relates to the regeneration of large area north of the city with high density mixed employment: a specific policy would be developed for the area.

Question 4.43 Is there a need for a policy addressing this issue?

The County Council **supports** the need for a policy for this area as a strategic priority and notes within the text for Option 33 the intention to develop a specific policy for this area. Reference should be made to not only the proposed new rail station, but to the proposed function of this area as a proposed key transport interchange for the area.

Question 4.44 Are there any points which have been missed?

Question 4.45 What should be the boundary be for this area?

Question 4.46 What should be the vision for the future of this area?

Question 4.47 What should be the key land uses within this area?

Question 4.48 Do you think land in this area should be safeguarded for sustainable transport?

The County Council's response to Questions 4.44 to 4.48 is below as the points made are interrelated and relate to allocations and designations within the Minerals and Waste LDF, which is part of the development plan.

The adopted Cambridgeshire and Peterborough Minerals and Waste Plan [Cambridgeshire and Peterborough Minerals and Waste Core Strategy (2011) and Site Specific Proposals Plan (2012)] makes a number of allocations and designations in this area, not all of which have been referred to in the supporting text for this Option. **A composite map showing the**

allocations and designations made in the Northern Fringe East is attached for your information. In summary they include:

- Policy W1F Area of Search for waste management uses (Household Recycling Centre and Inert Waste Management facility); and associated Waste Consultation Area (Policy W8I)
- Policy T1A Allocation for new Transport Zone (railhead) with ancillary development; and associated Transport Safeguarding Area (Policy T2E)
- Transport Safeguarding Area (for existing site) (Policy T2C)
- Waste Consultation Area for existing waste management site (Policy W8N)
- Waste Water Treatment Works Safeguarding Area (Policy W7I)

Development and Deliverability of Proposals

There are a number of cross-boundary issues to consider in the Northern Fringe East and the County Council in its capacity as the Waste and Mineral Planning Authority will work 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 above allocations and designations relate to waste management and transport infrastructure, which are both 'Strategic Priorities' identified in the NPPF (paragraph 156). They address the assessed waste management and related transport infrastructure needs of the Cambridge area over the period of 2026 (which was recently tested through the Examination of the Minerals and Waste Plan).

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 (paragraph 173) addresses viability and deliverability of plans, stating that *'Plans should be deliverable. Therefore, the sites and the scale of development identified in the plan should not be subject to such a scale of obligations and policy burdens that their ability to be developed viably is threatened.'* 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. Without adequate treatment capacity and a network of sites serving the Local Plan area, serious health and environmental pollution issues would rapidly develop. 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. Its purpose is to safeguard this essential infrastructure.

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. This policy places a presumption against allowing development in the Safeguarding Area, which would be occupied by people i.e. including new buildings or changes of use of buildings to residential, industrial, commercial, sport and recreational uses. Where development is proposed involving buildings which would normally be occupied, any application must be accompanied by an odour assessment report. 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

Paragraph 4.60 suggests that the WWTW could be accommodated on a reduced site, potentially enabling some housing development on the site subject to consideration of odour. Notwithstanding whether the aspiration of a reduced WWTW is achievable, this part of the option is unlikely to be deliverable given that there also an adopted allocation for a new Transport Zone with ancillary development on the WWTW site, and the WWTW site is also part of an Area of Search for a new Household Recycling Centre and Inert Waste Management Facility. Neither the WWTW, a 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 has two existing railheads (one of which is safeguarded), and an allocation for a new railhead. Rail is the principal means by which mineral that is produced out of the area is transported in e.g. from Leicestershire. It is a sustainable means of moving mineral and waste and significantly reduces the potential long distance movement of hard rock by road. 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, paragraph 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.

STRATEGIC PRIORITY

Cambridge East Options 34-36

Question 4.50 Is there a need for a policy addressing this issue?

The County Council supports a review of the policy context for this area as a strategic priority. The Action Area Plan (AAP) for Cambridge East is jointly adopted by both the City Council and SCDC and the County Council will have to respond to SCDC as well on this matter. The County Council reserves the right to make further comments at a later stage after joint discussions with both local planning authorities, the JSPU, other public authorities and interested parties.

Question 4.51 Which of the options do you prefer?

At this point in time, the County Council **supports** Option 35 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.

Question 4.52 Are there any points which have been missed ?

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 Councils 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.

Chapter 5

This chapter relates to possible opportunity areas i.e. areas with potential for improvement or development. The areas selected i.e. Mill Road, Eastern Gateway, Station Road and Hills Road involve the enhancement of the public realm and also the possible opening up of old quarries south of Coldham's Lane for recreation uses. **For options 37--40, the County Council invites discussion on further partnership working.**

Chapter 6

This chapter relates to sustainable development, climate change, water and flooding.

Develop a comprehensive sustainable development policy

Question 6.1 Is there a need for a policy addressing this issue?

The suggestion that 'recycling and waste facilities' could be included within a comprehensive sustainable development policy (option 42) is **supported** and this goes some way to acknowledging the strategic importance of waste. It is as vital as road links, schools, medical facilities parks and public art. Moreover, any policy addressing this issue could be a STRATEGIC PRIORITY given the overarching context of achieving sustainable development set out in International Resolutions, European and primary legislation primary eg The 2004 Planning and Compulsory Purchase Act, The 2008 Planning Act, The Climate Change Act 2008, The NERC Act 2006, The Localism Act 2011 and the NPPF.

Question 6.2 Are there any points which have been missed?

The County Council considers that the plan should include a short waste section. There should be a recognition that growth and development will impact on waste arisings and may lead to a need for further infrastructure to support the growth. The inclusion of a specific waste section would contribute to the public's understanding of this need. This section should also mention the RECAP guide so potential developers are aware of their responsibilities in regard to waste from the outset.

Develop a comprehensive integrated water management policy

Question 6.24 Is there a need for a policy addressing this issue?

The County Council **supports** this policy option given that the scale of development being considered in Cambridge and the possible disappearance of relevant policies (WAT 1-4) from the Regional Strategy (RS).

Question 6.25 Are there any points which have been missed?

The County Council should also refer to the Cambridgeshire SuDs Handbook

Water efficiency in residential development

Question 6.27 Is there a need for a policy addressing this issue

The County Council **supports** such a policy, given that the existing policies (WAT 1-4) in the RS may disappear eventually. There are overarching EU Directives relating to Water and Waste Water which need to be strictly observed against a background of climate change. Part 4 of the National Policy Statement on Waste Water published in March 2012 may be useful in adding context.

Question 6.28 Which of the options do you prefer?

The County Council **supports** Option 52; water neutrality is already an aspiration in the Joint Water Cycle Strategy (WCS) (Phase 2) for Cambridge and South Cambridgeshire (June 2011)

Question 6.29 Are there any points which have been missed?

A reference to the WCS would add context

Water consumption in non residential buildings

Question 6.31 Is there a need for a policy addressing this issue?

As 6.27

Question 6.32 Which of the options do you prefer?

The County Council **supports** Option 56, Water Efficiency – BREAM , as the costs of this approach are less onerous and yet a given scheme could still achieve BREEAM accreditation of “very good” or “excellent”.

Water efficiency in residential development

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Question 6.28 Which of the options do you prefer?

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Question 6.29 Are there any points which have been missed?

A reference to the WCS would add context

Developing a comprehensive flood risk reduction policy

Question 6.36 is there a need for a policy addressing this issue?

The County Council considers this policy to be necessary and therefore **supports** it as the Lead Flood Authority under the 2010 Flood and Water Management Act. Please refer to our response to 6.25.

Develop a water body quality policy

Question 6.39 Is there a need for a policy addressing this issue?

The County Council **objects** to this policy; The Water Framework Directive is already addressed through the Environment Agency Action Plan as part of the River Basin Management Plan. Appropriate recognition of the EA's role should be given to allow for full and effective coordination of the water environment elsewhere in a later draft. The SEA should consider all the likely significant effects upon the environment, which includes biodiversity and the water environment, as well as economic and social factors. The preparation of a Local Plan may require Appropriate Assessment where there is a likely significant effect upon a European site, which may not be necessarily in the same local authority area. The Water Cycle Strategy for Cambridge Phase One Report refers to sites in Norfolk, given that water is sourced from aquifers within the Breckland SAC/SPA (para 9.3.1)

http://www.cambridgeshirehorizons.co.uk/documents/environment/Cambridge_area_wcs_phase1.pdf

Sustainable construction standards Option 43

Question 6.4 Is there a need for a policy addressing this issue?

The County Council is **supportive** in principle of this policy, but is mindful of Codes or Standards changing over the life of the Plan. In addition, existing buildings, facilities, and infrastructure also need to be embraced.

Chapter 7

This chapter relates to the delivery of high quality places

The County Council as Highway Authority, Waste Authority and as Education Authority asks that further consideration be given to future maintenance and durability of materials in the light of further increases in population density within the City. This would apply to the general thrust of options in Chapter 7.

The general thrust of the options proposed within chapter 7 is to provide high quality places; however there is little or no consideration of future maintenance and the selection of materials and designs to provide places that can enhance the quality of life indefinitely in an environment of dwindling resources, both physical and financial.

Chapter 8

Chapter 8 relates to the protection and enhancement of the historic and natural environment.

STRATEGIC PRIORITY

Protecting and enhancing the historic and natural environment

COMMENT

In the absence of specific questions for Option 67, the County Council wishes to record its specific SUPPORT for this as a Strategic Priority.

The County Council also wishes to add that in relation to paragraph 8.1, we consider it important to recognise the contribution of the historic environment to heritage tourism and the economic value of this to the City. There is a correction to the 2nd bullet point within the Key Facts – There are currently 5 Scheduled Monuments and 12 designated Parks and Gardens within the City Council's administrative area. We also consider that the paragraph relating to the archaeological heritage of the City (7th bullet point) understates the significance and contribution of archaeological assets within the City's boundaries.

Cambridge has a rich archaeological heritage which includes an urban core with complex and deep stratigraphy relating to the Roman, Saxon and Medieval development of the City. There is extensive evidence for a well developed hinterland to the Roman town and for the prehistoric landscapes on the City fringes. Cambridgeshire County Council maintains the Historic Environment Record (HER) which contains comprehensive information and source material for known archaeological assets and interventions in the County. There are presently over 1400 undesignated archaeological monuments and over 560 separate events listed for the City and the HER is regularly updated as new discoveries come to light. Paragraph 8.2 similarly fails to adequately demonstrate the complexity and significance of the City's archaeological heritage

Protecting and enhancing the historic environment of a growing city

Protection and enhancement of Cambridge's historic environment Option 68

Question 8.1 Is there a need for a policy addressing this issue?

In this context the County Council would emphasise the important role and contribution of the Cambridgeshire Collection at the Central Library – the major, comprehensive collection of printed and photographic material on the history and life of the City and County – and Cambridgeshire Archives, based at Shire Hall Cambridge, the public repository for original archival documents relating to the city.

We support the policy proposal for protecting and enhancing Cambridge's historical environment (Option 68). In particular, we agree that there is a need for *"A strategy...to ensure that information about heritage assets produced as part of plan making and development proposals are made publicly accessible in order to improve our understanding of the historic environment"*. This would be in accordance with the NPPF.

Question 8.2 Are there any other points which have been missed?

Options 176 and 177 are complementary as new community facilities can be in shared buildings where information services and meeting facilities can be provided.

In relation to paragraphs 11.40 -11.42, the latest County Council policy for the delivery of a 21st Century Library Service recognises the importance of developing community hubs where library services can be provided in shared buildings in partnership with other services, education for example. These can include other Council and voluntary sector information and advice services, health services, adult learning services and children's centres, for example, and commercial partners such as the Post Office. This pattern of provision provides the best opportunity to deliver a wide range of complementary services and facilities, including community meeting spaces, to meet the needs of the growing communities.

This policy is in line with the principles now set out in this issues and options report for providing community services from shared buildings. It 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 communities close to Clay Farm and NIAB. However, it will be important to ensure that all new residents and people working or studying in Cambridge have easy local access to library services and the development of community hubs will be one way of meeting their needs. Therefore, we support both Option 176 and Option 177: we see them not as alternatives but as complementary and needed in combination, in order to meet the needs of existing and new communities in the most effective and cost efficient ways possible.

Chapter 9

This chapter relates to the delivery of high quality homes.

Lifetime homes

Questions 9.29 to 9.31

Option 111 to 113 suggest varying approaches to developing a policy requiring new housing to meet lifetime homes standard. Of the Options given, the County Council would **support** 112, as the percentage of new housing built to this standard could be varied and is less likely to undermine viability. Further consideration should be given to the possibility of modifying the policy to embrace the existing built environment, for example through redevelopment schemes. The comments made under Chapters 2 and 3 relating to an ageing population should also be brought into any explanatory text.

Chapter 10

ECONOMIC DEVELOPMENT

The Strategic Priority "Building a strong and competitive economy."

Question 10.1: Do you agree with the Vision? Question 10.2: Are there any points which have been missed and you feel should be added?

The Strategic Priority "Building a strong and competitive economy." is outlined under Option 121. The vision as outlined in 10.6 states,

"To strengthen and grow Cambridge's economy to provide a range of job opportunities across the city, especially in areas where Cambridge already stands out: higher education,

research and knowledge based industries, and maintain and strengthen the city's regional role as a centre for shopping and tourism"

The County Council **supports** the vision as outlined in 10.6 and suggests further consideration of the barriers to investment over the life of the Plan could be added, for example, the identification of priority areas for infrastructure provision. Forthcoming census data on commuting patterns and economic activity will facilitate our understanding of the Travel to Work Area (TTWA) of the sub-region.

Selective management of the economy

Question 10.3 Is there a need for a policy addressing this issue?

The County Council **supports** the need for a policy addressing the selective management of the economy (options 122-4)

Question 10.4 Which of the options do you prefer?

Option 123 - Amend selective management of the economy to include some additional uses is **supported**

Question 10.5 Are there any points which have been missed?

Option 123 The County Council believes that the additional uses allowed should be restricted to those downstream and headquarter uses linked to the high tech sector and excludes more general financial and business service headquarters

Protection of industrial and storage space

Question 10.7 Is there a need for a policy addressing this issue?

The County Council **supports** the need for a policy addressing the protection of industrial and storage space.

Question 10.8 Which of the options do you prefer?

The County Council **supports** option 127 Amend the policy of protection of industrial and storage space to encourage other forms of employment development *with provisos*. It is critical that expanding the criteria does not result in an accelerated loss of industrial floorspace particularly of the type which can accommodate the noisier and less attractive types of employment uses and/or can provide relatively cost effective facilities for start up industrial concerns, both of which are necessary to provide a mix of employment uses in a city the size of Cambridge.

Protection of other employment space

Question 10.11 Is there a need for a policy addressing this issue?

The County Council **supports** the need for a policy addressing the protection of other employment uses.

Question 10.12 Which of the options do you prefer?

The County Council **supports** Option 129 Protection of office space.

Promotion of cluster development

Question 10.15 Is there a need for a policy addressing this issue?

The County Council supports the need for a policy addressing the promotion of cluster development. Even if it has been rarely used to date, it is important from a perceptions perspective in affirming the City's support for the Cambridge high tech cluster.

Question 10.16 Which of the options do you prefer?

The County Council **supports** option 130 Continue to promote cluster development.

Densification of existing employment uses

Question 10.23 Is there a need for a policy addressing this issue?

The County Council **supports** the need for a policy addressing the densification of existing employment uses although it needs to be applied sensitively and selectively so that it does

not result in the image and perception of certain employment areas such as the Science Park being diluted and losing their attractiveness.

Question 10.24 Which of the options do you prefer?

The County Council supports Option 134 but with discretion in its application.

Shopping in town centres

Question 10.28 Is there a need for a policy addressing this issue?

The County Council supports the need for a policy addressing shopping in town centres. Given the uniqueness of the historic core shopping area and the City's role as a sub-regional shopping centre we believe that the city centre warrants separate policy options from the district and local centres which could probably have shared policies.

Question 10.29 Which of the options do you prefer?

The County Council supports Option 137 Separate policy options for different types of centre. The Cambridge Cluster Report and a number of consultants, potential investors and visitors have raised the issue of the "tired and slightly run down" nature of the appearance of several of the city centre's streets, particularly the public realm – Sidney Street is a prime example – and the impact that this could have on Cambridge's competitive retail advantage, particularly at a time when most city centres are under pressure from the recession and a reduction in consumer expenditure. environment.

University Faculty Development

Questions 10.46 and 10.53 Is there a need for policies addressing this issues?

The County Council supports the need for policies addressing faculty development at both Universities.

Specialist schools

Question 10.66 Is there a need for a policy addressing this issue?

The County Council supports the need for a policy addressing specialist schools.

Question 10.67 Which of the options do you prefer?

The County Council supports Option 152 Language schools.

Question 10.68 Are there any points which have been missed?

The possibility of converting existing buildings, vis a vis additional purpose built accommodation should not be discounted; additional on site accommodation would reduce trip generation; the supervision of large groups of students is a management issue

Visitor accommodation

Question 10.71 Is there a need for a policy addressing this issue?

The County Council supports the need for a policy addressing visitor accommodation/hotel provision

Question 10.72 Which of the options do you prefer?

The County Council supports Option 153 Additional hotel provision based on a high growth scenario of around 2000 new bedrooms

Question 10.73 Are there any points which have been missed?

Although the County Council supports the need for a policy addressing what types of new hotels are needed and where they should be located, sites close to transport hubs should be afforded priority. As to whether co-location of a hotel on the airport site is possible given the recent introduction of holiday flights to the Channel Islands and France/Italy and plans for other destinations to be served such as the Netherlands. If co-location were possible, a hotel on the site should not be precluded to the longer term. There is a need for a policy addressing the upgrade and conversion of suitable city centre properties to hotels, again defined by proximity to transport hubs.

Serviced apartments

Question 10.83 Is there a need for a policy addressing this issue?

The County Council **objects** to a policy addressing serviced apartments; short term uses could be controlled more effectively by other legislation such as licensing.

Question 10.84 Which option do you prefer?

The County Council **supports** Option 159 Consider using licensing to regulate serviced apartments rather than planning policy. The current use classes would need revision to allow full control; there is a risk that any enforcement may be disproportionate and not in the public interest. Short term use for corporate business does allow employees to move between different hubs/clusters.

Hotel and guest house retention in the town centre

Question 10.87 Is there a need for a policy addressing this issue?

The County Council supports the need for a policy addressing hotel and guest house retention in the city centre, subject to viability/ market testing.

Question 10.88 Which option do you prefer?

The County Council **supports** Option 160 (retention of hotels in the city centre).

Chapter 11

STRATEGIC PRIORITY

A green and pleasant city with vibrant and culturally diverse neighbourhoods

Question 11.1 Is there a need for a policy addressing this issue?

The County Council supports policy Option 163 as a strategic priority in so far as community facilities such as libraries/schools should be protected and enhanced. However, this should not preclude the possibility of change of use, multi use or relocation based upon a strategic assessment of library/community hubs in Cambridge. The policy itself should be sufficiently flexible to meet changing circumstances over the life of the Plan in order that the overriding national policy of enabling sustainable development embodied within the NPPF is not compromised. Option 69 Protection of buildings of local interest and development of a local list and Option 170 Protect existing community facilities are inherently related to Option 163; an amendment to the wording of Option 163 could be made to ensure compatibility.

Question 11.2 Are there any points which have been missed?

Regard should be made to strategic reviews of service provision by the County Council

Chapter 12

FUNDING OF INFRASTRUCTURE AND SERVICES

STRATEGIC PRIORITY

Timely provision of infrastructure Option 182

Option 184 – appropriate infrastructure

The county Council **supports** this policy and sees this as important in helping to ensure that new developments in Cambridge can be integrated with the sustainable travel network and that where possible and appropriate sustainable transport routes can be protected in support of sustainable development and helping to promote travel behaviour change away from the private car.

Promote non-car modes of Transport Option 183

Question 12.1 Is there a need for a policy addressing these issues?

The County Council supports the promotion of non-car modes of travel, and agrees there is a need for a policy addressing these issues. The wording of option 183 should be amended slightly so that it is clear that priority is given to all sustainable travel modes and to make it clear that any new roads or transport infrastructure are designed to give high priority to sustainable modes **and** do not promote additional car usage.

Question 12.2 Are there any points which have been missed and you feel should be added?

The policy could also support more sustainable use of the car, such as car clubs and carsharing, and low emission vehicles.

The policy could also support the promotion of alternatives to travel (i.e. facilities which allow people to travel less, such as home working space/facilities)

Option 184- Appropriate Infrastructure and Option 185 – Low Emission Vehicle Infrastructure

Question 12.4 Is there a need for a policy addressing these issues?

The County Council agrees there is a need for a policy addressing the provision of appropriate sustainable transport infrastructure including low emission vehicle infrastructure and supports option 184 and 185. We would suggest that car club and carsharing spaces/facilities are included in option 184 rather than in option 185 as car club/carsharing vehicles are not necessarily low emission vehicles.

In terms of car parking standards, cycle parking design and standards and modal split options for new development, in principle we support the inclusion of policies to clarify these matters. However further investigation and discussion of the options would be welcome to consider the results of the consultation and fit with the strategic approach in the draft Transport Strategy for Cambridge and South Cambridgeshire. This is currently being developed and would be beneficial to review local policy approach with strategy to ensure they are complimentary. The County Council would be pleased to work with City colleagues/stakeholders to discuss and review details as plans progress.

We also agree there is a need for a policy regarding travel plans and support option 196. However it may also be necessary for smaller developments in sensitive areas (eg AQMAs, areas of high congestion etc) to produce travel plans. Developments below the threshold should also be encouraged to participate in travel planning activities, e.g. Area-wide travel plans. The County Council would be pleased to be involved in further discussions on this policy area (and any subsequent reviews of policy in this area).

Telecommunications policy criteria based Option 199

Question 12.32 Is there a need for a policy addressing this issue?

The County Council supports this policy.

Question 12.33 Are there any points which have been missed?

Consultation should also include the Highway Authority where appropriate if works may be in the highway or near the guided busway, or a safeguarded line of a highway, and also the Suds Approval Body .in due course.

In addition, we would recommend the inclusion of a policy that requires new developments to make provision for communications / broadband infrastructure. 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. The roll-out of ultrafast broadband in the Cambridge urban area will help the city to become highly connected at ultrafast speeds to facilitate correspondingly innovative business, public sector and social environments - thus driving economic growth.

Government has committed to meeting 2020 targets of 100% access to 30Mbps connectivity and 50% of households taking services of 100Mbps or more. In the Cambridge urban area,

the targets in the Urban Broadband Fund application (Sept 2012) are to secure investment in ultrafast broadband infrastructure (80-100Mbps or more) and to deliver the UK target of 100% access to ultrafast-capable fixed networks and wireless connectivity in the urban area.

This could be achieved through a policy which requires provision for access to a minimum of 30mbps connectivity for all new homes and developments. Ideally this should be included in all new homes. 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.

Question 12.34 Do you think there are any other reasonable alternatives?

As per our response to 12.33, the policy should be amended to take account of broadband development (see more detailed text under 12.33).

Provision of infrastructure and services Option 201

Question 12.38 Is there a need for a policy addressing this issue?

The County Council **supports** in principle a policy for the provision of infrastructure and services. The County Council notes that the list given in Option 201 "is not exhaustive and there may be scope for requiring contributions towards a wider range of infrastructure measures".

Questions 12.39 Are there any points which have been missed?

National guidance does set out costs per head of population increase to cover building, fitting out, equipping and stocking libraries. This guidance is contained in the document: *Standard Charge Approach for public libraries* developed by the Museums, Libraries and Archives Council (May 2010) on behalf of the Department of Culture, Media and Sport, the central government department with overall statutory responsibility for public libraries. Finally, although we realise that the list of services included in Option 201 is not exhaustive, we strongly request that library services be included as a specific area of infrastructure because of the need for funding the statutory responsibility to provide a library service to all communities, including new communities and because it represents multi-purpose provision which contributes to several of the areas already included in the list: education (including lifelong learning); leisure and recreation facilities; community and social facilities; cultural facilities and the County Council will need to rely on this final policy document in negotiations with developers and possibly even at public inquiries.

The Community Infrastructure Levy if this is introduced will play an important role in ensuring that funding can be secured from developers towards the infrastructure requirements of the Local Plan. However CIL is unlikely to cover the full costs of all infrastructure requirements. Therefore it will be important to identify strategic infrastructure requirements and priorities for funding with partners such as ourselves early to help ensure clarity over phasing and funding.

The NPPF requires local planning authorities work collaboratively on 'strategic planning priorities', which includes waste management. It also requires them to demonstrate that they have effectively cooperated to plan for issues with cross-boundary impacts. Cooperation should be a continuous process of engagement from initial thinking through to implementation, and crucially should result *'in a final position where plans are in place to provide the land and infrastructure necessary to support current and projected future levels of development'* (NPPF, paragraph 181). **The NPPF therefore requires a solution to any identified gap in the provision of essential infrastructure, and the responsibility to find a solution is a shared one** (contrary to the suggestion in the Issues and Options Report, end of paragraph 12.41).

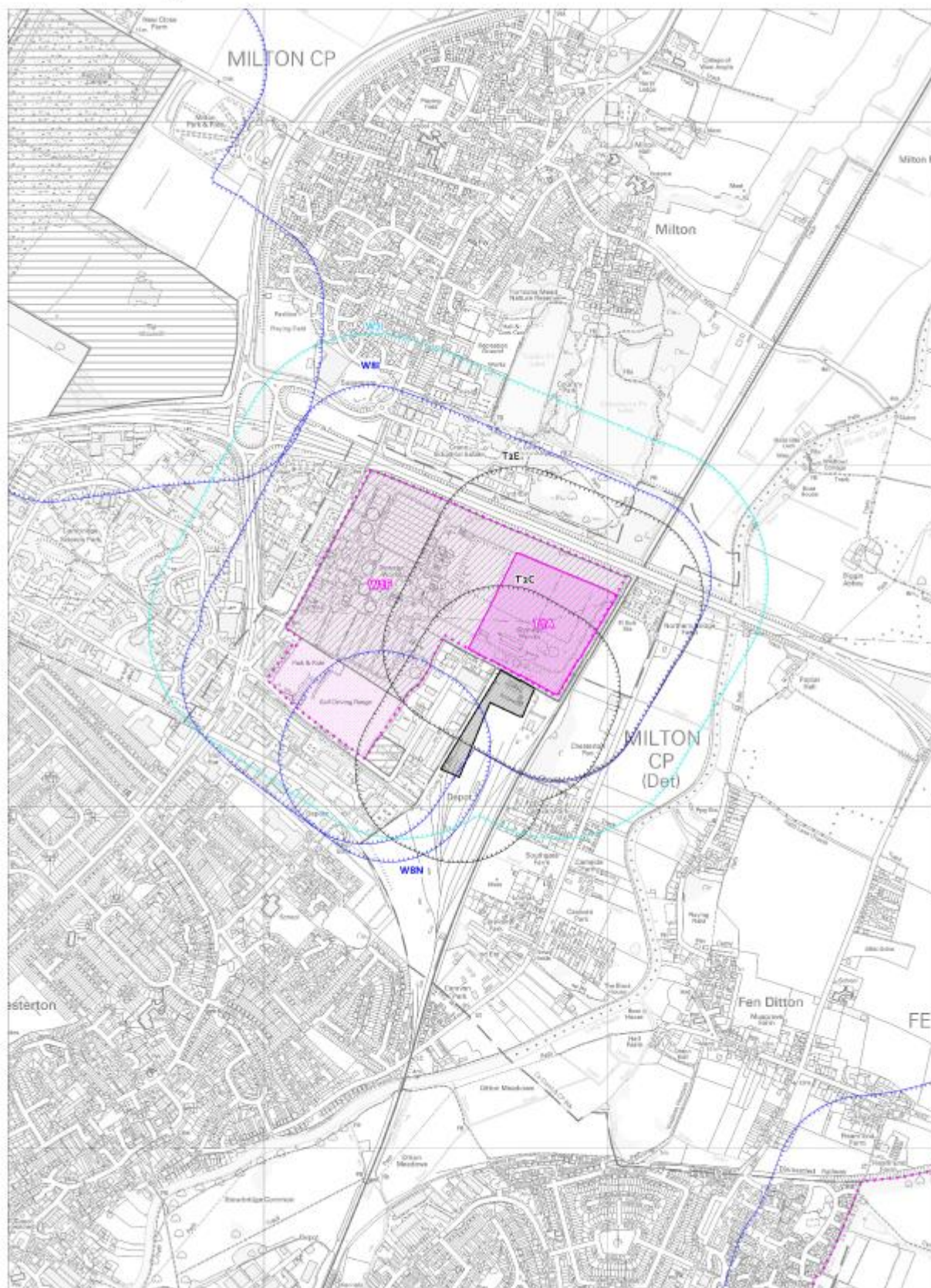
The adopted Cambridgeshire and Peterborough Minerals and Waste Core Strategy 2010 identifies the need for new Household Recycling Centres (HRC) to serve existing and

emerging new communities over the period until 2026. These facilities are necessary to assist in meeting stringent targets for the diversion of waste away from landfill. The Plan sets out the broad locations where they are to be located including Cambridge South. The latter broad location may potentially encompass a number of the City Council's potential 'broad location' and 'option' areas.

The need for the 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.

Therefore, in relation to Section 1.30 of the report, whilst the plan does not specifically cover waste, the County Council considers that it should still acknowledge the role waste will play in emerging developments and recognise both the City Council's role as collection authority and the County Council's role as disposal authority and seek to ensure that the close relationship between those roles is properly managed and that the mechanisms for doing so are in place.

Chesterton Sidings Area - MW Allocations



Scale (at A3): 1:10,000
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