

Appendix 1. Summary of Consultation Responses:

Report Section	Respondent	Comment and related section / reference	Council Response	Proposed Amendment
3.4	Strutt & Parker on behalf of County Council Education Capital (CCEC)	The LVL should draw distinctions between different types of applications and where there have been previous assessments these should be cross referenced.	Noted and further comment below	None proposed or considered necessary
3.5	CCEC	<p>Planning Statement - Item 1: The critical wording within Policy HQ/2 is that public art is only encouraged to be considered and it is not a mandatory requirement. The LVL should therefore not require developments of greater than 1000 square metres in size to assess public art provision because it is not reasonable to think that it will be a material consideration in the determination of the application in accordance with Section 6, paragraph 4A, of the Growth and Infrastructure Act.</p> <p>It is suggested that the following wording is removed from the LVL: For South Cambridgeshire District Council's area: Where relevant for developments of proposed new floor space of 1000 square metres or more, consideration of integrating public art into the design of the development are encouraged, so a statement addressing the consideration of this policy requirement should be included to demonstrate policy consideration.</p>	<p>It is considered that the references in the LVL Guidance to the fact that consideration is 'encouraged' and that 'consideration of this policy requirement should be included' provides sufficient flexibility to allow discretion.</p> <p>For example, the Planning Statement could state that consideration was given to this requirement and provide reasons why it was not considered necessary.</p>	None proposed or considered necessary
N/A	CCEC	Local Authority Development Letter - Item 2: No objection is raised in relation to the need for a LA Development letter.	Noted	None proposed or considered necessary
N/A	CCEC	Statement of Community Involvement - Item 3: No objection is raised to the requirement to prepare a Statement of Community Involvement on the basis that it is only required in respect to Category A development proposals.	Noted	None proposed or considered necessary
N/A	CCEC	Biodiversity Survey and Report - Item 4: No objection is raised in relation to the requirements in respect of Biodiversity Surveys and Reports, which reflect a more detailed guidance on the matter.	Noted	None proposed or considered necessary
3.6	CCEC	<p>Statement of Sustainable Design and Construction - Item 5:</p> <p>We recognise the current Climate Change Emergency that has been declared by both CCC and a number of the District Councils, however we consider that the Statement of Sustainable Design & Construction requirements as set out within the LVL consultation document could benefit from being amended.</p>	See notes below against specific suggestions.	<p>Points 1. and 2. None proposed or considered necessary</p> <p>3. Clarification on the difference between the Rapid and Full HIAs will be requested from our colleagues in Public Health and delegated authority is sought to amend the guidance accordingly.</p>

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		<p>The provision for a mobile classroom which is of modular design, the requirement to submit a full Statement of Sustainable Design and Construction is not considered to be reasonable, on the basis that the ability to change the Design and Construction of the mobile classroom is very limited. It is not considered warranted for this to be provided as a standalone document for developments of a floor space of less than 1000 square metres and it could be dealt with as a section within the Planning Statement.</p> <p>1. It is therefore recommended that the following changes are made to the wording:</p> <p>Within South Cambridgeshire District Council's area:</p> <ul style="list-style-type: none"> • For all applications other than modular classroom applications. <p>Within all districts and Cambridge City Council:</p> <ul style="list-style-type: none"> • For New schools and all developments creating more than 1,000m² of floor space. <p>2. It is considered to be confusing for Health Impact Assessments to be included under a Statement of Sustainable Design and Construction. HIA's tend to be standalone documents that should have a separate category on the LVL to a Statement of Design and Construction.</p> <p>3. . It is appreciated that the requirement for the HIA is taken from District Council's requirements, however no clear explanation is provided within the LVL in relation to the difference between a Rapid HIA and a Full HIA. HIA's also provide a duplication with a lot of information that is within a Planning Statement and therefore it is important that the HIA requirements are proportionate to the scale and size of the development. For new schools, which are within wider growth areas. For these types of applications, the vast majority of the decisions relevant to HIA's relate to external factors outside the applicant's control, such as position of the local centre, etc and HIA's have already been submitted and approved as part of Outline application consents. Therefore, the HIA's for these schemes should</p>	<p>1. It would not be appropriate to remove this requirement for all planning applications relating to modular classroom because this is particularly relevant to the construction, design and installation of new mobile classrooms. Sustainability and design remain key issues within planning and key priorities for the County Council. However, officers within the County planning team do have some discretion in the application of this requirement within the validation process and would only require such a statement if it was necessary and appropriate.</p> <p>2. Noted. However, this requirement comes from the Greater Cambridge Sustainable Design and Construction Supplementary Planning Document (Adopted January 2020) and therefore it is not within the remit of the County Council to amend it. However, the submission of a separate Health Impact Assessment in support of applications would be acceptable.</p> <p>3. Whilst this point is noted, ambitions 3 and 4 of the Council's Strategic Framework 2023-28* relate to reducing health inequalities and enabling people to enjoy healthy lives and therefore the health impact assessments are a key issue that needs consideration. * Link to: https://www.cambridgeshire.gov.uk/asset-library/Business-Plan-Section-1-Strategic-Framework-2023-28.pdf</p> <p>Moreover, some Outline planning approvals relate to new communities and / or are an overview of the wider proposed development (similar to a Masterplan) that does not provide sufficient detail of the design to be able to determine the relevant health impacts and the necessary mitigation. For example, the specific detailed design of a proposed new primary school</p>	
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		be light touch and refer back to the HIA approved as part of the wider Outline consent.	<p>would need to be presented in a reserved matters application in order for the health impacts and mitigation to be fully considered.</p> <p>Furthermore, timescales between the applications for Outline approvals and Reserved matters are such that changes to the surrounding area and new planning considerations, that were not able to be considered in detail at the time of the Outline application, become relevant and pertinent and would need due consideration within an HIA.</p> <p>Noting the explanation and considerations outlined above, it would not be appropriate to only require a light touch HIA for Reserved matters applications.</p>	
N/A	CCEC	Tree Survey/Arboricultural Report - Item 6: No objection as set out in relation requirements for a tree survey.	Noted	None proposed or considered necessary
N/A	CCEC	Flood Risk Assessment - Item 7: No objection.	Noted	None proposed or considered necessary
N/A	CCEC	Surface Water Drainage Strategy and Foul Drainage Strategy - Item 7A: No objection.	Noted	None proposed or considered necessary
N/A	CCEC	Heritage Statement - Item 8: No objection.	Noted	None proposed or considered necessary
N/A	CCEC	Landscape Impact Assessment - Item 9: No objection.	Noted	None proposed or considered necessary
N/A	CCEC	Landscape Proposals - Item 10: No objection.	Noted	None proposed or considered necessary
3.7	CCEC	<p>Landscape and Biodiversity Enhancement Management Scheme - Item 11: Whilst the need for a Landscape and Biodiversity Enhancement Management Scheme is appreciated, it is considered that in some instances this can be dealt with by way of suitably worded pre- occupation planning condition (e.g., as specified in Cambridge City Council Validation Requirements). The advantage of this approach is that it allows the document to be prepared once the Landscape Planting proposals have been fixed following the determination of the planning application.</p> <p>To account for this change it is recommended that the following changes are made to the List: Types of applications that require this information.</p> <ul style="list-style-type: none"> • Where soft landscape or biodiversity enhancement measures are proposed the submission of a Landscape and Biodiversity Management Scheme will be encouraged. Where applications are not accompanied by Landscape and Biodiversity Management Schemes, the requirement 	<p>There are only likely to be limited circumstances in which it would be appropriate to impose a condition requiring the submission of a Landscape and Biodiversity Enhancement Management Scheme at a later date, for instance some proposals for Regulation 3 development. However, this would not be appropriate for applications for mineral or waste development.</p> <p>Furthermore, noting that Biodiversity Net Gain is a key requirement of, and consideration in, all planning applications, and the provisions in the new Environment Act that will come into force within the two years in which the revised LVL will apply, it is considered essential that the assessment of how the enhancements will be achieved are considered at the earliest possible stage in the determination process.</p>	None proposed or considered necessary

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		<p>for them can be dealt with by way of a suitably worded planning condition (see items 4 and 10 above).</p> <ul style="list-style-type: none"> • Applications for new landfill sites or their extension will require aftercare of the restored land. 		
3.8	CCEC	<p>Transport Assessment of Statement - Item 12: The need for both a Transport Assessment and Transport Statement are both understood; however it is considered that the LVL needs to be refined to account for when they are required.</p> <p>As set out within paragraph 4 of the national government guidance for Travel Plans, Transport Assessments and Transport Statements it is stated that where the transport impacts of a development are not significant, it may be that no Transport Assessment or Statement or Travel Plans are required.</p> <p>However, the current approach being taken by the County Planning Authority is to require a Transport Statement for all increases in school size regardless of the size of the expansion. It is therefore important that the LVL is revised so that Transport Statements are only required for developments, which will have a 'significant' impact in accordance with national guidance.</p> <p>For example, a single classroom extension to a primary school, which relates in 2 additional staff members and 30 additional children at the school is highly unlikely to have a 'significant' impact and therefore in most instances a Transport Statement would not be required. This is particularly the case for schools which have a good Travel Plan in place, which in turn will enable an assessment to be made regarding how many children will travel to school by foot or cycle. For these smaller developments, it is considered that transport impact could be dealt with within the Planning Statement.</p> <p>The Greater Cambridge Shared Planning Services local validation requirements clearly define the thresholds whereby Transport Statements or Assessments are required. This is set out as follows: 'Transport Assessment or Statement is required for.</p> <ul style="list-style-type: none"> • Residential developments at or above 20 dwellings or 0.5 hectares (it is appreciated that this is not applicable for County Matters) • Other developments at or above 1000m2 or 1 hectare • Where developments have significant transport implications' 	<p>Comments in response from the County Council's Transport Assessment Team –</p> <p>"Having read through this (Response from Strutt & Parker on behalf of CCC Education Capital items 12 to 14), I do not foresee any significant issues from a TA team point of view given the nature of and trip patterns associated with schools.</p> <p>The only issues that might come about is that the trip generation from a 2-classroom extension would significantly exceed the trip generation from 20 dwellings or 1000m2 of B8 use. It might therefore be perceived that schools are being given 'preferential treatment' in terms of whether a Transport Statement/Assessment is required".</p> <p>In addition, (and as noted in relation to the comments in respect of the requirement relating to Health Impact Assessments above) although new schools within growth area sites will have been subject to a full Transport Assessment as part of the wider Outline application, until the detailed design of the school is brought forward for consideration, a full consideration cannot be made. Provision of the Assessments previously undertaken is a good start but it will not always be based on up-to-date information of the site and surroundings which will have developed between the approval of the Outline permission and the submission of Reserved matters.</p> <p>Having noted the points raised, on balance, it is recommended that the wording remains the same with officer discretion being applied to suit the particular circumstances of each site.</p>	None proposed or considered necessary

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		<p>This is significantly less onerous than the proposed requirements and specifically is worded to allow small scale developments such as single mobile classrooms and smaller extension to not have to provide Transport Statements, because of their size and scale. The same threshold has been used for Travel Plans, which is reasonable and appropriate.</p> <p>In respect of Transport Assessments, it is also stated that they are required for all new schools. Objection is raised to this approach. As noted in section 1 above, most new schools within the County are situated within growth area sites, which have been subject to a full Transport Assessment as part of a wider one Outline application site. Therefore, the traffic and transport movements to and from the new school will have already been assessed as part of the Outline consent.</p> <p>It is therefore recommended that the following changes are made to the LVL:</p> <p>Types of applications that require this information.</p> <ul style="list-style-type: none"> • Transport Assessment – where the proposed development has significant transport implications including new schools that have not been assessed already as part of a wider Outline application consent. Where new schools are within locations, where the transport impact of the school has already been assessed as part of the Transport Assessment for the wider site, the Transport Statement will cross reference to the Transport Assessment for the wider site. • Transport Statement – schemes where the proposed development has significant transport implications, such as projects which involve an increase in school size by at least 3 classrooms or schemes which will create more than 1000 square metres of floor space. • For projects of a smaller, scale for example school projects of one/two classroom expansion (including mobile classrooms applications) a Transport Statement will not normally be required, but transport matters can be dealt with within the Planning Statement. 		
3.9	CCEC	<p>Parking and Access Arrangements - Item 13: No objection is raised in relation to the need for Parking and Access Arrangements to be provided with applications. However, the supporting text needs re-wording, which</p>	<p>Noted. However, parking and access arrangements are separate and distinct from Transport Assessments and Statements and therefore it is considered necessary to retain the duplication.</p>	<p>None proposed or considered necessary</p>

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		<p>provides a duplication with the requirements set out in respect of a Transport Assessment or Statement. It is recommended that the following sentence be deleted from item 13 of the LVL:</p> <ul style="list-style-type: none"> • Applications, which if permitted, would lead to an increase in traffic, including an increase in capacity/floorspace which could potentially lead to an increase in traffic. 		
3.10	CCEC	<p>Construction Environmental and Traffic Management Plan - Item 13a:</p> <p>The proposed requirements are significantly more onerous than those of the Greater Cambridge Shared Planning Service which require the submission of CEMP's for: 'All Major Developments or developments that are likely to result in noise, smells, dust, visual or other adverse effects during the course of construction.'</p> <p>The Greater Cambridge guidance also notes that where a construction management plan is not submitted with an application specific details and mitigation measures can be required by planning condition.</p> <p>It is requested that the draft LVL amended in accordance with the Shared Planning Service guidance that CEMPs are required for major applications only.</p> <p>It is also considered important that the wording for this section is amended to specifically exclude mobile classrooms, which are modular in nature, constructed off-site and do not involve any major construction works on the site.</p>	<p>Noted. However, some planning applications that are classed as minor still need consideration of how environmental and traffic issues will be considered and accounted for during construction. The possible impacts from for example dust, noise, vibration and traffic during construction do not only apply to major planning applications.</p> <p>The following matters also require consideration in relation to the installation of a modular mobile classroom: school sites often have limited or restricted access, they are often in residential areas where roadside parking is at a premium and therefore due consideration of the arrangements, access, delivery hours during construction are likely to be required. In addition, many modular classrooms have associated infrastructure such as access ramps.</p> <p>Taking all of the above into account, the removal of the requirement for a CEMP for minor applications and for mobile classroom applications is not considered to be appropriate.</p>	None proposed or considered necessary
3.11	CCEC	<p>Travel Plans - Item 14:</p> <p>No objection is raised in relation to the need for school Travel Plans. For flexibility, accounting for the urgency of some of the temporary mobile classroom applications, it is considered that the LVL should allow this to be dealt with by way of suitable worded planning condition, prior to the occupation of development. This approach would be proportionate and reasonable having regard to the tests set out in national policy.</p> <p>In addition, as noted in our response to LVL item requirement 12, a single classroom application is not considered to create 'significant' traffic movements, and it is our view that it is these applications that should allow for</p>	<p>Noted. Whilst the suggestions are welcomed, it is considered that the proposed wording is partially acceptable and the suggested revision to the wording is set out in the proposed amendment column to the right.</p>	<p>Proposed amendment to include the wording:</p> <p>"For smaller school applications, for example where there is a one or two classroom increase, the need for a Travel Plan can be dealt with by way of a suitably worded prior to occupation condition".</p>

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		<p>greater flexibility in terms of whether a Travel Plan is required for submission with the application.</p> <p>Our suggested changes to the wording are set out as follows:</p> <ul style="list-style-type: none"> • All developments including waste developments that are likely to generate a significant increase in vehicle movements (other than for sites which can demonstrate very limited staffing levels and visitor numbers). This includes school development involving a net increase of three or more classrooms, temporary or permanent (90 pupils). For smaller school applications for a one or two classroom increase, the need for a Travel Plan can be dealt with by way of a suitably worded prior to occupation condition. • Where the school has a Travel Plan, the application should be accompanied by an updated version that considers the school population when developed. Where existing data is not available, for example in relation to modes of transport for new school proposals where there are no children attending the school, outline travel plans may be accepted. These should be linked to a transport assessment or statement. 		
3.12	CCEC	<p>Noise and / or Vibration impact assessment - Item 15: There is duplication in relation to the types of applications which require this information which should be corrected (draft LVL page 22).</p> <p>It is requested that the requirement within this section is re-worded to refer to 'new sports pitches' only.</p> <p>Secondly it is also requested that the requirement for this to be provided should be excluded for schools where noise from playing pitches has already been considered at Outline application stage for growth area sites.</p>	<p>Noted, however if the wording was changed to refer to 'new sports pitches' only, it would not cover extensions to sports pitches and therefore it would not be appropriate to make the suggested change.</p> <p>In relation to the request that the requirement should not apply where outline permission has been granted and the noise has already been assessed, as noted above, the level of detail in outline applications and permissions is not always sufficient to take all of the planning considerations into account and properly determine the impact of the development.</p>	None proposed or considered necessary
N/A	CCEC	<p>Lighting assessment - Item 16: No objection.</p>	Noted	None proposed or considered necessary
N/A	CCEC	<p>Air Quality assessment - Item 17: No objection is raised in respect of the requirements for Air Quality Assessments. It is noted that, the size of a site is arbitrary in respect of air quality matters and it is questioned why a site area should be used at all. For example, schools are not likely to have an adverse impact on local air quality regardless of the size of their playing fields.</p>	Noted.	None proposed or considered necessary

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N/A	CCEC	Contaminated Land Assessment - Item 18: No objection	Noted	None proposed or considered necessary
N/A	CCEC	Waste Audit and Management Strategy - Item 21: No objection.	Noted	None proposed or considered necessary
N/A	CCEC	Open Space/Playing Field Assessment - Item 22: No objection is raised in relation to the Open Space/Playing Field Assessment criteria, although in a number of instances this can be dealt with within the Planning Statement.	Noted	None proposed or considered necessary
N/A	CCEC	Information in support of applications for the storage, treatment, and disposal of waste - Item 23: No objection.	Noted	None proposed or considered necessary
N/A	CCEC	Plans and Drawings - Item 24: Whilst this provides a duplication to guidance contained within national policy, no objection is raised to this criterion on the basis that it provides helpful wayfinding and clarification for applicants.	Noted	None proposed or considered necessary
3.14	Climate Change and Energy Services (CCES)	When is the Minerals and Waste Local Plan due for renewal? I think there is an opportunity to strengthen Policy 1 when the time comes.	The Minerals and Waste Local Plan (MWLP) was adopted in July 2021 and runs to 2036. However, a review of the MWLP will be undertaken no later than 2026 to ensure that the policies remain relevant and effectively address the needs of the local community at which time Policy 1 can be reviewed.	None proposed or considered necessary
3.15	CCES	The team would like to see all applications be required to provide an assessment of climate change impacts, either as a separate item, or as part of the Statement of sustainable design and construction. This should include: <ul style="list-style-type: none"> - An assessment and quantification of greenhouse gas emissions likely to occur as a result of the proposed development, for all relevant lifecycle stages (as per PAS2080), for most applications this will include embodied carbon from construction materials, operational energy use and operational transport use. Some applications may have other relevant categories too e.g. waste, user use of infrastructure (for highways schemes). - Steps taken to minimise or avoid GHG emissions at each lifecycle stage (construction, use, disposal) - Proposals that reduce GHG emissions compared to doing nothing, or remove more GHGs from the atmosphere than will be emitted (removal either through technological or nature based solutions), should usually be supported (subject to other criteria of course) - All relevant GHGs should be included, and expressed in units of tonnes CO₂ equivalent 	The requirement to consider the likely impact of climate change is already included in the Local Validation List (LVL). Further discussion and advice is required from CCES to assist the County planning team in providing the necessary advice and guidance to developers including what would be considered to be relevant evidence to demonstrate that climate change issues have been addressed. Officers recommend that further liaison with CCES is required and legal advice is sought, to confirm whether, and to what extent, climate change matters can be addressed through the planning application process and to what weight can be given to them as a material planning consideration.	None proposed at this time. However, further liaison with CCES is proposed to review the recommendations and format the recommendations into guidance for developers that will be put before the Council's legal advisors for review.

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		<p>- GHG emissions related to electricity should take into account the forecast decarbonisation of the UK electricity grid over time The team would like to see a full lifecycle carbon footprint calculation.</p>		
	CCES	<p>It may also be helpful to say something about offsetting but need to check the other Council's policies. Effectively we want to say this should only be a last resort. And for CCC own developments it should not be done at all, or check with CCES team first.</p>	Noted.	None proposed or considered necessary
	CCES	<p>We may also want to say something more about adaptation.</p>	Noted.	None proposed or considered necessary
	CCES	<p>In Section 5 Statement of Sustainable Design and Construction and the Types of applications that require this information, - the Requirement must be for all development since the Council at the General Purposes Committee on 17 December 2019, agreed that all new build council buildings would be designed to meet EPC rating of A or better, 6+ BREEAM 'Ene01' energy credits, and >80% of expected energy use to be met from renewable sources.</p>	<p>It is not considered that the requirement can be extended to all development as the agreement referred to only applies to all new build council buildings.</p>	<p>Further discussion of this issue will be undertaken with CCES on this point and a further update to the LVL can consider incorporating this point.</p>
	Natural England	<p>No Objections or comments to make on the update of the LVL requirements.</p> <p>Whilst Natural England is generally satisfied that statutory natural environment matters with our remit are adequately addressed through the Cambridgeshire County Council Validation List Requirements (VLR), we strongly recommend that the list advocates the use Natural England's Impact Risk Zones (IRZs) to ensure that submission documents have adequately considered potential risks to SSSIs prior to any consultation with us. We advise that you consult your authority's ecologist on the VLR, for advice on wider biodiversity matters.</p> <p>The lack of comment from Natural England should not be interpreted as a statement that there are no impacts on the natural environment. Other bodies and individuals may wish to make comments that might help the Local Planning Authority (LPA) to fully take account of any environmental risks and opportunities relating to this document.</p> <p>Should the proposal be amended in a way which significantly affects its impact on the natural environment, then in accordance with Section 4 of the Natural Environment and Rural Communities Act 2006, please consult Natural England again.</p>	<p>Noted.</p> <p>As part of the validation checks undertaken by planning and development management officers, the location and proximity of Sites of Special Scientific Interest (SSSI), Nature reserves and County Wildlife sites are identified and the County Council's Ecology team and Natural England are consulted on relevant applications.</p> <p>The Council's Ecology team were consulted on the LVL and, if necessary, further advice can be taken from the County Ecologist on this point.</p>	None proposed or considered necessary

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	Fordham Parish Council	Couldn't see anything on renewable energy for 'Planning Applications' i.e., Solar Panels, heat pumps etc.	Officers rely on and refer to the consultation response from the Climate Change team and consultation responses are available to view on the Council's Public Access webpages.	None proposed or considered necessary
	Fordham Parish Council	Item 1 - Planning Statement: Under Information required it mentions that 'the statement should also consider the likely impact of climate change. Should this be from a valid authority?	Climate Change and Energy Services are consulted on relevant applications. Further work on adapting and updating the LVL in relation to this area is proposed.	None proposed or considered necessary
	Fordham Parish Council	Item 4 - Biodiversity survey and report, Policy Drivers Is it possible for the Parish Councils to have copies of these policies.	The policies are publicly available either within the LVL or links to the local district authority's development plans. Officers will contact the Parish Council to go through their comments and provide further information and assistance.	None proposed or considered necessary
	Fordham Parish Council	Item 10 Landscape proposals: Where trees or hedgerow will be removed because of the development compensatory planting will be required. Who agrees what the replacement planting is and at what point in the development?	The County Ecologist and the Wildlife Trust is normally consulted regarding any effects/impacts on ecology, habitats and biodiversity. Relevant information on any application regarding ecology and habitats will be provided to the Parish Council.	None proposed or considered necessary
	Fordham Parish Council	Item 11 Landscape and biodiversity enhancement management scheme: Three Bullet points under 'What information is required, who oversees this and how is it monitored?	The County Ecologist and the Wildlife Trust monitor these requirements. The Parish Council will be updated should any actions be required at any site in their area(s).	None proposed or considered necessary
	Hemingford Grey Parish Council	Resolved to make no comments	Noted.	None proposed or considered necessary
	Witcham Parish Council	No comments to make.	Noted.	None proposed or considered necessary
	National Highways	No comments to make.	Noted.	None proposed or considered necessary
	National Air Traffic Services	No comments to make on the validation list requirements.	Noted.	None proposed or considered necessary
	UK Health Security Agency	No comments to make.	Noted.	None proposed or considered necessary