

Greater Cambridge Local Plan: First Proposals (Regulation 18) Consultation Response

To: Environment and Green Investment Committee

Meeting Date: 20 January 2022

From: Steve Cox - Executive Director, Place and Economy

Electoral division(s): All divisions within South Cambridgeshire and Cambridge City

Key decision: No

Forward Plan ref: N/A

Outcome: The Committee will consider and endorse the County Council's response to the Greater Cambridge Local Plan

Recommendation: The Committee is requested to:

- a) Endorse the consultation response to the Greater Cambridge Local Plan (First Proposals) as set out in Appendix 1; and
- b) Delegate to the Executive Director (Place and Economy) in consultation with the Chair and Vice Chair of the Committee the authority to make minor changes to the response.

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1. Background

- 1.1 Cambridge City Council and South Cambridgeshire District Council are working together to create a joint Local Plan for the two areas, collectively referred to as Greater Cambridge. This will ensure that there is a consistent approach to planning with the same planning policies where appropriate across both areas being used for decision making. The Plan is being prepared by Greater Cambridge Shared Planning (GCSP) on behalf of the two local planning authorities.
- 1.2 Local Plan preparation follows a process set out in national legislation and guidance and is independently tested at a public examination to check it is 'sound' – this means that it is realistic, deliverable and based on good evidence – before it can be formally adopted.
- 1.3 The new Local Plan is being prepared within a wider regional context, including the Oxford-Cambridge Arc and within the legal duty to cooperate with key stakeholders, including the County Council, and surrounding areas on strategic cross boundary issues.
- 1.4 The First Proposals stage sets out the preferred approach to the level of growth that should be planned for, and where it should be planned. It also highlights uncertainty about the delivery of water infrastructure needed to support new growth, and how this could impact on the timing of developments proposed. It describes the planning policies that will be prepared that will shape development and guide planning decisions.
- 1.5 The current consultation is seeking responses to these proposals before they develop into detailed planning policies at the next stage.
- 1.6 Feedback is sought particularly on:
 - The emerging development strategy
 - The direction of travel for policies
 - Issues we should be considering as policies are prepared
- 1.7 The deadline for making responses to this consultation was 13th December 2021. Consequently, internal consultations have been conducted with other County Council service areas and a formal officer response has been submitted to GCSP in advance of this Committee. GCSP are aware these comments are subject to the Committee's agreement.
- 1.8 The consultation documents can be viewed on the GCSP website at the following link: [Greater Cambridge Planning hyperlink](#).

2. Main Issues

- 2.1 The consultation seeks comments on the extent to which the proposed strategy and policies in the Local Plan will deliver the vision and aims for the Plan and whether there are other policies that need to be included.
- 2.2 The key issues for the County Council to consider are:

- What are the implications for County Council services and infrastructure from the scale and location of proposed development? Are there policies in place to help mitigate any adverse impacts and support the delivery of services?
- Is the strategy and the proposed policies consistent with the corporate objectives of the County Council?
- Has the plan making authority adequately consulted and engaged with the County Council in formulating the strategy and policies? The consultation and engagement points will be covered in the separate Statement of Common Ground and Duty to Cooperate Statement.

2.3 The table below lists the key themes and policies proposed in the Local Plan that directly relate to the County Council's areas of responsibility.

Theme	Policy
How much development, and where?	S/JH: New jobs and homes
	S/DS: Development strategy
Climate change	CC/NZ: Net zero carbon new buildings
	CC/FM: Flooding and integrated water management
	CC/CE: Reducing waste and supporting the circular economy
	CC/RE: Renewable energy projects and infrastructure
	CC/CS: Supporting land-based carbon sequestration
Biodiversity and greenspace	BG/BG: Biodiversity and geodiversity - '20% net gain'
	BG/RC: River corridors
	BG/PO: Protecting open spaces
Wellbeing and social inclusion	WS/HD: Creating healthy new developments
	WS/CF: Community, sports, and leisure facilities
Great Places	GP/QP: Establishing high quality landscape and public realm
	GP/HA: Conservation and enhancement of heritage assets
	Policy GP/CC: Adapting heritage assets to climate change
Jobs	J/RE: Supporting the rural economy
	J/AL: Protecting the best agricultural land
Homes	H/SS: Residential space standards and accessible homes
	H/SH: Specialist housing and homes for older people
Infrastructure	I/ST: Sustainable transport and connectivity
	I/EV: Parking and electric vehicles
	I/SI: Safeguarding important infrastructure
	I/EI: Energy infrastructure masterplanning
	I/ID: Infrastructure and delivery
	I/DI: Digital infrastructure

2.4 An internal consultation has been undertaken within the County Council and responses have been received from Education, Floods and Water, Mineral and Waste and Transport Strategy. These responses have been included in Appendix 1, which has formed the basis for the Council's response to GCSP.

Duty to Cooperate and Statement of Common Ground

- 2.5 A statement of common ground is a written record of the progress made by strategic policy making authorities during the process of planning for strategic cross-boundary matters, demonstrating effective co-operation throughout the plan-making process. It is also part of the evidence required for local planning authorities to demonstrate that they have complied with the duty to cooperate.
- 2.6 Cambridgeshire County Council in its capacity as Local Highways Authority, Minerals and Waste Planning Authority, and with responsible for a range of infrastructure and services including education and social care is a signatory to the Statement of Common Ground.
- 2.7 For the transport modelling of the Preferred Option the local authorities and relevant partners have confirmed via the Transport subgroup a shared understanding of the certainty and timing of strategic transport infrastructure and schemes impacting on Greater Cambridge. These were included as baseline schemes within transport modelling supporting the First Proposals consultation. Also, the Councils have agreed with neighbouring authorities the development assumptions in the modelling for those districts. This engagement will continue to inform the full draft local plan. There are no areas of disagreement on this strategic matter.

3. Alignment with corporate priorities

3.1 Communities at the heart of everything we do

There are no significant implications for this priority.

3.2 A good quality of life for everyone

There are no significant implications for this priority.

3.3 Helping our children learn, develop and live life to the full

There are no significant implications for this priority.

3.4 Cambridgeshire: a well-connected, safe, clean, green environment

There are no significant implications for this priority.

3.5 Protecting and caring for those who need us

There are no significant implications for this priority.

4. Significant Implications

4.1 Resource Implications

There are no significant implications within this category.

4.2 Procurement/Contractual/Council Contract Procedure Rules Implications

There are no significant implications within this category.

4.3 Statutory, Legal and Risk Implications

There are no significant implications within this category.

4.4 Equality and Diversity Implications

The GCSP has prepared an Equalities Impact Assessment as part of the Local Plan Sustainability Assessment. This has indicated that there are only positive and neutral impacts on the relevant protected characteristics. Under the public sector equality duty any County Council projects related to the implementation of the local plan will be subject their own Equalities Impact Assessment.

4.5 Engagement and Communications Implications

There are no significant implications within this category.

4.6 Localism and Local Member Involvement

The public consultation carried out by GCSP has followed the statutory procedures. A briefing note on this matter has been provided to Spokes and asked to share it with their respective groups. All members whose division falls within the plan area have been notified.

There are no significant implications within this category.

4.7 Public Health Implications

There are no significant implications within this category.

4.8 Environment and Climate Change Implications on Priority Areas

4.8.1 Implication 1: Energy efficient, low carbon buildings.

Positive/~~neutral~~/~~negative~~ Status:

Explanation: The Local Plan will contain policies that will seek to carbon within new buildings

4.8.2 Implication 2: Low carbon transport.

Positive/~~neutral~~/~~negative~~ Status:

Explanation: The Local Plan promotes a development strategy and policies that will support low carbon transport

4.8.3 Implication 3: Green spaces, peatland, afforestation, habitats and land management.

Positive/~~neutral~~/~~negative~~ Status:

Explanation: The Local Plan will contain policies to support biodiversity, green space and carbon sequestration.

4.8.4 Implication 4: Waste Management and Tackling Plastic Pollution.

~~Positive~~/neutral/negative Status:

Explanation: The Local Plan will contain a policy to support waste reduction and the circular economy.

4.8.5 Implication 5: Water use, availability and management:

Positive/neutral/negative Status:

Explanation: The Local Plan will contain policies to promote water efficiency in new developments and integrated water management.

4.8.6 Implication 6: Air Pollution.

Positive/neutral/negative Status:

Explanation:

4.8.7 Implication 7: Resilience of our services and infrastructure, and supporting vulnerable people to cope with climate change.

Positive/~~neutral~~/~~negative~~ Status:

Explanation: the Local Plan will contain a policy that will set out how development should take account of sources of pollution.

Have the resource implications been cleared by Finance? Yes or No Name of Financial Officer: Sarah Heywood

Have the procurement/contractual/ Council Contract Procedure Rules implications been cleared by the LGSS Head of Procurement? Yes or No Name of Officer: Henry Swan

Has the impact on statutory, legal and risk implications been cleared by the Council's Monitoring Officer or LGSS Law? Yes or ~~No~~ Name of Legal Officer: Fiona McMillan

Have the equality and diversity implications been cleared by your Service Contact? Yes or ~~No~~ Name of Officer: Elsa Evans

Have any engagement and communication implications been cleared by Communications? Yes or No Name of Officer:

Have any localism and Local Member involvement issues been cleared by your Service Contact? Yes or ~~No~~ Name of Officer: Emma Fitch

Have any Public Health implications been cleared by Public Health? Yes or No Name of Officer: Kate Parker

If a Key decision, have any Environment and Climate Change implications been cleared by the Climate Change Officer? Not applicable as this is not a key decision.

5. Source documents

5.1 Source documents

Greater Cambridge Local Plan consultation documents.

5.2 Location

[Greater Cambridge Planning hyperlink](#)

Appendix 1: Cambridgeshire County Council Response to the Greater Cambridge Local Plan (First Proposals) Consultation

1. Education

Vision and development strategy

Section / Policy	Your comments
S/DS: Development strategy	<p>The plan proposes that sites are developed at densities with recognition that ‘using less land for development reduces carbon emissions and allows more space for nature and wildlife’. Whilst the Council accepts these principles, sufficient land would need to be made available for educational purposes.</p> <p>Cambridgeshire County Council’s Children and Young People Committee have previously approved the site sizes which would be required to deliver a new school. These ensure that there is sufficient flexibility for sites to be developed in line with space per pupil/area guidelines provided by the Department for Education (DfE) (DfE Building Bulletins 103 and 104 for mainstream and special provision respectively), and allows for on-site early years and childcare provision, in line with Council policy. Whilst the Council will endeavour to explore different options for delivery or education provision, and in keeping with the surrounding area, there would need to be clear reasoning for any request to deviate from its policy and published national DfE’s Building Bulletins’ guidance for full consideration by members of the relevant committees.</p> <p>The proposed strategy is heavily informed by the location of existing and committed public transport schemes. The Council is fully supportive of this but would also insist that footpaths and cycle routes are taken into consideration, to ensure that schools are centrally located and easily accessible to families living within the catchment area and to fulfil the objective that ‘developing sites can be well-integrated with existing communities’. This ensures that children and their families can attend them by either walking or cycling rather than through local authority provided transport or car and fulfil health and well-being expectations for children, e.g., around ‘healthy schools’</p>
S/SH: Settlement hierarchy	<p>The Council appreciates the wish to raise Babraham to a ‘Group Village’ as it has a primary school consistent with infrastructure in other Group Villages. The school is currently full to its capacity of 0.5FE/84 places and operates with four classes (it operates a Published Admission Number (PAN) of 12). The school’s site and context mean that it has previously been determined that there is no scope for significant expansion beyond its current size.</p>

Section / Policy	Your comments
	Some children currently attend from within Sawston catchment, so displacement of places back to Sawston should be borne in mind with development at Babraham.

Cambridge urban area

Policy	Your comments
S/NEC: North East Cambridge	<p>Based on the housing mix that has informed the North East Cambridge Area Action Plan, the development is expected to generate approximately 1,362 early years' children, 790 primary-aged pupils (3.8FE) and 205 secondary-aged children (1.4FE). This would require delivery of up to two primary schools on site, both with early years' provision. Additional sites would also need to be allocated and marketed for full day care provision. This is partly to ensure sufficient EY places, which could not be provided on the school sites alone, but also to promote choice of type of EY provision for families who are not entitled to funded childcare but still wish to access provision. At this stage, it is for illustrative purposes only. The Council will not be able to confirm its education requirements, land and contributions until later in the planning process when the housing mix is finalised.</p> <p>The Council remains committed to working in collaboration with South Cambridgeshire District Council and Cambridge City Council during the Area Action Plan making process and is supportive of the view that the detailed planning framework containing site specific policies will be of equal status to those in the Local Plan once adopted.</p> <p>The policy states that formal sports facilities will be largely delivered off-site. Whilst the Council does not object to this approach, it would insist that school playing fields are located on-site to ensure that high-quality PE curriculum can be delivered without the requirement to travel.</p>
S/AMC: Areas of Major Change	Continuation of AMCs noted.
S/OA: Opportunity Areas in Cambridge	<p>The Council is supportive of the objective for the Opportunity Areas in Cambridge. The new Opportunity Areas, S/OA/NR (Newmarket Rd Retail Park) and S/OA/BC (Beehive Centre) both fall within the St. Matthew's Primary School catchment. St. Matthew's is a restricted site. Whilst the existing school cannot expand any further to mitigate any potential children from potential housing in the OAs, the intention to 'improve...infrastructure delivery' in the OAs could enable longer-term solutions for the school's needs, e.g., new-build and relocation as part of the holistic approach outlined.</p>
S/LAC: Land allocations in Cambridge	The Council notes the intended use for S/C/SCL Land South of Coldham's Lane as for commercial purposes, which will not

Policy	Your comments
	impact on existing Land North of Cherry Hinton/Cambridge East education plans.

Edge of Cambridge

Policy	Your comments
Edge of Cambridge - general comments	<p>The Council will continue to work closely with both Cambridge City Council and South Cambridgeshire District Council in the development of area action plans and policies. One key aspect for education place planning is always around timing of a development and as clear an understanding of housing mix as possible, so as not to destabilise existing provision and to ensure the curriculum effectiveness and long-term financial viability of schools, for example. A second is around connectivity and transport issues for early years and school access with the integration of provision within a community.</p> <p>There are possibly quite complicated scenarios arising in Cambridge East where the Council will be interested to support policy development.</p>
S/CE: Cambridge East	<p>The Council notes the further development of this area subsequent to it being 'safeguarded' under the 2018 Local Plans and the existing permission granted to Land North of Cherry Hinton (LNCH) within the site. The Council is already working on proposals for the delivery of a primary and secondary school in the context of the outline permission for 1,200 homes at this location.</p> <p>The Council notes a further 2,900 dwellings are anticipated at Cambridge East to 2041, with a total of 7,000 once the site is completely developed. The Council would find it valuable, in the context of the existing schools' proposals, to understand at the earliest possible opportunity where the 2,900 dwellings are planned within the site; whether adjacent to the current LNCH site south of the airport/green corridor or to the north along Newmarket Road and adjacent to Marleigh, etc., or both.</p> <p>Based on the Council's approved general multipliers, the level of additional development proposed to 2041 (2,900 dwellings), would generate approximately 580-870 early years' children, 870-1,160 primary-aged pupils (4.1FE-5.5FE) and 520-725 secondary-aged pupils (3.5FE-4.8FE).</p> <p>In theory, Cambridge East could require the equivalent of three 2FE/two 3FE schools to accommodate site development until 2041, with a further possible 3FE school required (630 places) to cater for the 640 places (max multiplier) for the residual 1,600 dwellings post 2041.</p> <p>Further, assuming the landowner/developer(s) may wish to bring forward smaller land parcels across the site for development at</p>

Policy	Your comments
	<p>different stages, the Council recommends adoption of an up-to-date area action plan for the holistic development of both the remaining site and integration with existing communities at Cherry Hinton, LNCH and Marleigh.</p> <p>One reason for this is around timing. LNCH currently includes provision for a 2FE Primary School (420 places i.e. 60 places in each of the 7-year groups of the primary phase) and a 2FE Wave 12 free primary school is in build, in conjunction with DfE, for Marleigh. The current expectation, given housing mixes understood at the time of writing, is that Marleigh Primary will open in September 2022 with a published admission number of 15 for entry in year Reception. It will accept in-year applications for all year groups and will build gradually to 1FE (30 places in each year group) and eventually 2FE (60 places in each year group) to meet the needs of the development as it grows.</p> <p>Timing is also important to avoid surplus places at existing primary schools within the local area, factoring in demographic basic need, which could have implications for effective curriculum delivery and financial sustainability.</p> <p>Timing of primary place provision is going to be critical for school sustainability both within Cambridge East and for schools in communities surrounding it.</p> <p>For Early Years, additional sites would also need to be allocated and marketed for full day care provision. This is partly to ensure sufficient places which would not be met by the schools alone, but also to promote choice and for families who are not entitled to funded childcare but still wish to access provision.</p> <p>Regarding secondary provision, a Wave 12 free secondary school is currently being planned in consultation with DfE, the Multi-Academy Trust (MAT) which will run the school and the developers (Bellway) at LNCH. The secondary school is to be located at the eastern gateway to LNCH, off Airport Way and will be south of the 'green corridor'</p> <p>DfE is proposing it will be a 4FE capacity (600 place) secondary to begin with. The Council has proposed that this should be built with the ability to expand on the same site to 6FE (900 places). The permitted development at LNCH, on current housing mix proposals, will see a demand of approximately 1FE, Marleigh potentially 2.5FE. Bearing in mind the 2,900 additional dwellings to 2041 of approximately 520-725 secondary-aged pupils, 3.5FE-4.8FE, this school, as currently envisaged, could potentially absorb much, but not all possible demand, with a possible deficit in places of 1-2.3FE by 2041, unviable for a second 11-16 school. However, the residual post-2041 build-out implies a further 1,600 dwellings still to come at Cambridge East. This would not yield a sufficient number of secondary age children for another viable secondary school, however the</p>

Policy	Your comments
	<p>allocation of land for a second campus prior to 2041 would enable necessary expansion beyond the current 6FE envisaged to cover a 1-2.3FE deficit by 2041 and the additional need requirements beyond 2041, which could stretch that deficit to as much as 3-5FE.</p> <p>In the immediate to short-term, the situation of other existing local secondary schools needs to be borne in mind, particularly in circumstances where basic need has dropped in the past few years.</p> <p>Therefore, the Council recommends a further site for secondary provision should be identified at Cambridge East to accommodate capacity closer to 2041 and the post 2041 residual build-out.</p> <p>Again, for school effectiveness and financial sustainability purposes, timing of both this first secondary and further 11-16 provision are critical.</p> <p>Assuming the LNCH secondary school remains the main local secondary school for the majority of the period to 2041, consideration needs to be given to student, family and wider community access to it across the 'green corridor' from the northern part of the site and Marleigh. Public transport as well as walking and cycling routes will need to bear this in mind.</p> <p>At this stage, all figures provided here are for illustrative purposes only. The Council will not be able to confirm its education requirements, land and contributions until later in the planning process when the housing mix is finalised</p>
S/NWC: North West Cambridge	<p>The intensification of the site, already identified for development, will place additional demands on infrastructure, and on the associated contributions to deliver it.</p> <p>Based on the Council's approved general multipliers, this level of additional development (1,500 dwellings), would generate approximately 300-450 early years' children, 450-600 primary-aged pupils and 270-375 secondary-aged pupils. It may therefore be necessary for a 2-3 form entry primary school, with on-site early years provision.</p> <p>In addition to early years and childcare provision on site at the new primary schools, it will be necessary to allocate and market additional sites suitable for full day care provision. This is partly to ensure sufficient places which would not be met by EY provision on the school sites alone, but also to promote choice and for families who are not entitled to funded childcare but still wish to access provision. Where possible, the Council would encourage the co-location of establishments to promote partnership working. The Council would also actively encourage developers to provide free plots of serviced land or purpose-built buildings.</p>

Policy	Your comments
S/WC: West Cambridge	The Council notes the intention 'to add flexibility to the [existing] policy, to allow an element of residential, focused on affordable housing and key workers' on a site primarily focused on science and technological research. The Council would recommend a plan to incorporate likely dwelling numbers and density at an early date and would support the approach to consider 'the potential for a single policy that looks at this site together with the University's North West Cambridge site, to ensure the benefits of this significant area of innovation are maximised, will be considered as part of preparing the draft plan.' This would help ensure social and community infrastructure assets, including early years and education provision, are included as necessary and shared across sites of a similar community character.
S/EOC: Other existing allocations on the edge of Cambridge	Proposals noted.

New settlements

Policy	Your comments
S/CB: Cambourne	<p>Cambourne is currently served by one secondary school, Cambourne Village College, which is part of The Cam Academy Trust. The Trust applied to the Department for Education (DfE) to open a 6-form entry/900 place Free school as part of Wave 12 of the Free Schools Programme, in recognition of the significant level of planned on adjacent land to the west of Cambourne village (2,350 dwellings). However, this was unsuccessful.</p> <p>Since this decision, the Council have been working collaboratively with the Trust on plans to expand the existing school to ensure that there is sufficient capacity to accommodate both the existing community and families moving into new developments within the town. Once complete, Cambourne Village College will have capacity for 11FE/1,650 places, as well as a 350 place sixth form for young people aged 16-19.</p> <p>The increase of 1,950 dwellings within the town could therefore pose an issue with regards to appropriate mitigation. There is limited scope for further expansion on the school's current site, however, the additional housing will not create enough demand to make a new secondary school viable. The Council would therefore be supportive of the view that additional development should not simply be about delivering more housing, but instead, focus should be upon how this area including Cambourne and</p>

Policy	Your comments
	Bourn Airfield and nearby villages will function as a place, and its relationship with Cambridge, to enhance its sustainability.

Climate change

Policy	Your comments
Climate change - general comments	In May 2019, Cambridgeshire County Council declared a Climate and Environment Emergency, and recognises that this is a priority with both local and central government. The Council is therefore supportive of the inclusion of this as one of the overarching themes.
CC/NZ: Net zero carbon new buildings	<p>A change to the Building Regulations which came into force on 1 January 2019 means that all new buildings owned and occupied by public authorities must be 'Nearly Zero Energy Buildings', and policies and specifications of all buildings reflect this. To achieve compliance, the Council's preferred policy is a combination of different mechanisms including achieving at least 6 BREEAM energy performance "Ene01" credits, designing buildings to achieve an EPC rating of A or better and/or installing on-site renewable energy generation sized to meet a significant proportion (>80%) of the building's expected energy use. Policy CC/NZ is less flexible with specific targets set for non-domestic buildings, including schools.</p> <p>Delivering schools which are 'Nearly Zero Carbon' buildings has increased the capital cost of construction by 10%. With further, and more specific targets, such as those above, and notwithstanding advances in technology, additional cost is likely to be incurred. The Council would therefore require associated policies to make clear the expectation on developers meeting such costs through section 106 agreements.</p>
CC/WE: Water efficiency in new developments	See CC/FM comments below.
CC/FM: Flooding and integrated water management	Policy CC/FM includes the expectation that developments will be required to provide integrated water management, including sustainable drainage systems (SuDS). The Council would be supportive of this being incorporated into the design of new schools. However, it should be acknowledged that this is likely to increase the size of the site required for a school. Currently, it is Council Policy to request the minimum site size required to enable delivery of a school which meets the standards set by the Department for Education (DfE), including suitable outdoor space to enable physical education in accordance with the school curriculum and to enable pupils to play outside. As this is a statutory requirement and delivered through the planning

Policy	Your comments
	<p>process via Sport England, there would be a statutory planning objection if not incorporated into the design. Including SuDS within the design would require an additional land allocation. Costs and space would also need to be incorporated into s106 agreements to ensure children's safeguarding if, for example, SuDS ponds were to be on site rather than using attenuation tanks.</p> <p>The Council therefore feels it would be most appropriate for any targets to be incorporated in policy to be the subject of a technical assessment on their achievability and cost, before being formally adopted.</p>
CC/RE: Renewable energy projects and infrastructure	See response to CC/NZ above.

Wellbeing and inclusion

Policy	Your comments
WS/CF: Community, sports, and leisure facilities	Where facilities are to be used by the school and the wider community, there are a number of associated safeguarding concerns. For this reason, the Council would strongly suggest that separate access arrangements are planned and these would be expected to be fully funded by the developer to mitigate the level of risk. There will also need to be early engagement from all parties to ensure that there is a mutually agreed basis on which access to the facilities will be managed.

Infrastructure policies

Policy	Your comments
I/ID: Infrastructure and delivery	The County Council has a strong preference for contributions towards educational facilities to be sought through section 106, as opposed to seeking through the Community Infrastructure Levy (CIL). This allows for a cost per place to be calculated meaning that contributions are both appropriate and proportionate.

2. Floods and Water

Climate change

Policy	Your comments
CC/DC: Designing for a changing climate	Support the mention of SuDS in this policy. It would be good to ensure that drainage and SuDS are included in this. We are receiving more and more queries on whether surface water

Policy	Your comments
	proposals are going to include consideration for climate change, so having this written in policy would be useful.
CC/FM: Flooding and integrated water management	<p>The direction of the policy is going in a good direction, taking inspiration of the Cambridge City Local Plan 2018, as this holds good practice for the design of SuDS systems.</p> <p>There should be an emphasis on managing surface water close to the source, on the surface and within open SuDS where practicable. I note it is included, but this should be the basis of all surface water schemes.</p> <p>There is no mention of water quality in the proposed policy direction section. This should be included within the local plan as a standalone point within the flood management policy. This could include the use of terms such as the SuDS Management Train, focussing on providing multi stages of treatment through cascading structures. This is the way that developments should be going in managing their surface water.</p> <p>While climate change is covered in Policy CC/DC, it would be worth including the surface water systems should be designed with an allowance of climate change included</p> <p>The document is very much setting out the policy directions, it would be good to know the general set out of the proposed policy, as the listed versions of these policies are useful in interpreting, signposting and referring stakeholders to for information or as part of a scheme.</p> <p>Reference should ideally be made to the Cambridgeshire Flood and Water Supplementary Planning Document (SPD), or any subsequent version of this, which is adopted South Cambs and Cambridge City individually.</p> <p>It is noted that the policy will not need to repeat items covered by the NPPF, however, reference should be made to this within the document.</p>

3. Mineral and Waste

Vision and development strategy

Section / Policy	Your comments
S/SB: Settlement boundaries	<p>Has implications for Cambridgeshire and Peterborough Minerals and Waste Local Plan (July 2021) (MWLP) Policy 5.</p> <p>Consultation with the mineral planning authority (MPA) is not needed for development proposals within a settlement boundary or where they are consistent with an allocation in the development plan for the area.</p>

Cambridge urban area

Policy	Your comments
S/NEC: North East Cambridge	No comments – covered in Area Action Plan Statement of Common Ground.
S/LAC: Land allocations in Cambridge	Site S/C/SCL – within a Mineral Safeguarding Area (MSA) for chalk. Former landfill so it is assumed that mineral has already been extracted. Within the settlement boundary.

Edge of Cambridge

Policy	Your comments
S/CE: Cambridge East	All of the site is within a MSA for chalk; part within a MSA for sand & gravel. MWLP Policy 5.
S/NWC: North West Cambridge	Most of the site is within a MSA for sand & gravel. Policy 5. Southeast section of the site nearly all within a MSA for chalk and is within the settlement boundary.
S/CBC: Cambridge Biomedical Campus	Most of Consultation Area (CA) for Addenbrooke's energy from waste Management Area (WMA) is within the Proposed Area of Major Change. S/CBC/E/2 is partly within the CA. All of the PAMC is within a MSA for chalk and parts are within a MSA for sand & gravel.
S/WC: West Cambridge	Small part of site is within a MSA for chalk. Within settlement boundary.

Rural southern cluster

Policy	Your comments
S/GC: Genome Campus, Hinxton	All within a MSA for chalk; a very small part of the site at south is within a MSA for sand & gravel. MWLP Policy 5 applies.
S/BRC: Babraham Research Campus	All within a MSA for chalk; nearly all is within a MSA for sand & gravel. MWLP Policy 5 applies.
S/RSC: Village allocations in the rural southern cluster	S/RSC/HW - All within MSAs for chalk and sand & gravel. MWLP Policy 5 applies. Site is adjacent to residential properties; amenity buffer likely to sterilise most of the mineral. S/RSC/MF – All within a MSA for chalk. MWLP Policy 5 applies. Site is adjacent to residential properties and too small to contain a workable quantity of mineral. S/RSC/CC - All within MSAs for chalk and sand & gravel. MWLP Policy 5 applies. Site is too small to contain a workable quantity of mineral.
S/SCP: Policy areas in the rural southern cluster	S/SCP/WHd – All within a MSA for sand & gravel; part within a MSA for chalk. Most of the site is within the settlement boundary. Railway, A505 and existing residential and other

Policy	Your comments
	sensitive properties would be a constraint to working the minerals.

Rest of the rural area

Policy	Your comments
S/RRA: Allocations in the rest of the rural area	<p>S/RRA/ML – All within a MSA for chalk. The site is adjacent to residential properties and too small to contain a workable quantity of mineral.</p> <p>S/RRA/MF – All within a MSA for sand & gravel. WWLP Site is adjacent to residential properties and too small to contain a workable quantity of mineral.</p> <p>S/RRA/CR – All within a MSA for chalk. Situated between Melbourn Science Park and residential properties and too small to contain a workable quantity of mineral.</p> <p>S/RRA/BBP – Within CA for Uttons Drove Water Recycling Area (WRA). MWLP Policy 16 applies.</p>
S/RRP: Policy areas in the rest of the rural area	S/RRP/L – Only very small part at east of site within a MSA for sand & gravel.

Climate change

Policy	Your comments
CC/RE: Renewable energy projects and infrastructure	This policy may interact with the Cambridgeshire and Peterborough Minerals and Waste Local Plan, in respect of energy from waste and district heating. Early consultation about the wording of this policy would be appreciated.
CC/CE: Reducing waste and supporting the circular economy	<p>Inclusion of this policy is supported, however it is suggested that the Circular Economy is given priority over Reducing Waste in the title, as it has a much wider scope. It is also suggested that the Councils may wish to consider explicitly linking this policy with Policy CC/NZ: Net zero carbon new buildings; as these two policies interact with each other.</p> <p>The waste hierarchy proposed by the Draft Plan reads “Refuse, Reduce, Reuse, Repurpose, Recycle”. It is appreciated that this is based on the “5 r’s”, but to avoid confusion the Councils may wish to either clarify in the policy or supporting text that ‘refuse’ is seeking to minimise avoidable resource use and not the refusal of planning permissions or development outright. The waste hierarchy as set out in Appendix A of the National Planning Policy for Waste (October 2014) is: Prevention, Preparing for Re-use, Recycling, Other recovery, Disposal.</p> <p>Reference to the requirement for the RECAP guide is welcomed and accords with Policy 14 of the Cambridgeshire and Peterborough Minerals and Waste Local Plan (MWLP).</p>

Policy	Your comments
	<p>The mineral and waste planning authority (MWPA) has noted that Policy CC/6: Construction Methods which embedded consideration of waste management within the South Cambridgeshire Plan appears, by being embedded in that Plan to have been particularly effective, and inclusion of this policy is welcomed.</p> <p>When referring to resources to be considered, the MWPA wishes that aggregate and other minerals are included and highlighted for consideration by applicants.</p> <p>The MWPA would welcome further discussion on this topic, potentially as part of a SoCG.</p>

Supporting documents on which we are consulting

Policy	Your comments
Sustainability Appraisal (incorporating the requirements of the Strategic Environmental Assessment)	The MWPA welcomes the inclusion of minerals as an objective, albeit noting the negative and uncertain result for most options considered. The MWPA would encourage the consideration of "Sustainable resource use" or "Waste minimisation" when considering objectives for future local plans.

4. Transport

Vision and development strategy

Section / Policy	Your comments
Vision and aims	<p>On Page 18 the definition of sustainable development is very welcome but given the importance of sustainability in the document we feel that this section should have greater prominence. There is also a significant infrastructure requirement to deliver the proposed Local Plan, so it is going to be a challenge to deliver this in a sustainable way.</p> <p>Welcome the emphasis on active and public transport, and planning development at sites where public transport is the natural choice. We would recommend clear reference to ensuring new future development meets LTN 1/20 and other appropriate policies and measures.</p>
S/DS: Development strategy	<p>From the evidence of the options tested at the time S01 performed best in transport terms. It should be noted that not all transport mitigation had been tested. Transport however is not the only consideration when developing a Local Plan and there are numerous other factors that require consideration. Therefore we are happy to support S09 Preferred Option growth level Preferred Option spatial strategy for the Emerging Local Plan. S09 emerged from including sites that performed well in transport terms in earlier testing. Section 15 of the Greater</p>

Section / Policy	Your comments
	<p>Cambridge Local Plan: Transport Evidence Report October 2021 provides a good summary of the transport impacts.</p> <p>It is noted that North East Cambridge and Cambridge Airport, Waterbeach and existing new town development lead to better performance in transport terms and greater internalisation of trips. Generally, the larger the development the greater the chance of trips being internalised, and the settlement is likely to have a greater chance at being able to provide key services and facilities.</p> <p>Cambourne was the best performing in transport terms of the free-standing new settlements of those tested at stage one- with the Cambourne to Cambridge public transport scheme and East West Rail included. Any development in the Cambourne / Bourne Airfield area needs to have good links to the existing community to enable greater access to services and to reduce the potential transport impacts of any new development.</p>

Cambridge urban area

Policy	Your comments
Cambridge urban area - general comments	<p>Section 2.2 - the term unnecessary private car use is very subjective would recommend something with a clearer definition is used.</p> <p>Link to Cambourne and East West Rail (EWR) need to maximum the benefits of this. Consider setting our policy specific to EWR with the LPA's vision, objectives, and requirements (e.g. for stations, connectivity etc) should this project come forward.</p> <p>Welcome Greater Cambridge Planning to fully engage with Network Rail to ensure that Cambridge South station maximises use of Active Travel and that provision of drop off and collection points are suitable, and do not cause a negative impact on the surrounding area.</p>

Infrastructure policies

Policy	Your comments
I/ST: Sustainable transport and connectivity	<p>Maybe provide reference to the CCC Transport Assessment Teams guidelines as to what development sizes need to do would be helpful.</p> <p>https://www.cambridgeshire.gov.uk/business/planning-and-development/developing-new-communities</p>
I/EV: Parking and electric vehicles	<p>There needs to be clearer and more specific guidance regarding cycle and mobility parking with clear minimum standards.</p> <p>Given the phasing out of fossil fuelled cars by 2030 and the lifespan of this Local Plan to 2041 we believe that high provision</p>

Policy	Your comments
	<p>of electric car charging points should be provided. Whilst electric cars are not the answer to all transportation problems, they do have benefits and insuring infrastructure is in place will assist with their adoption.</p> <p>No reference could be found to electric car charging points in public car parks or on streets. A policy is required on this as otherwise issues will arise with on street parking and charging provision.</p> <p>This section will require an update following recent announcements: https://www.bbc.co.uk/news/business-59369715</p>
I/AD: Aviation development	<p>“would not have a significant adverse impact on the environment”. It is unclear how any airport/aviation development could not have a significant adverse impact on the environment, given aviation’s massive carbon emissions, although this may change in the future.</p>

Comments on Evidence Base Documents

Policy	Your comments
Greater Cambridge Local Plan Transport Evidence Report November 2020	<p>P22 clearly shows which scenarios performs best in terms of public transport, S01 Densification being best.</p> <p>4.3 clearly shows the predict highway impacts of the development options, S01 Densification being best this is also true of delay figure 8.</p> <p>5 Is helpful and shows option 1 or option 7 are the best performing options</p> <p>The report seems to be cut short and ends at page 35?</p>
Spatial Options Review Supplement minor corrected 12 Sept 21	<p>Layout of the document as landscape made it difficult to read on screen.</p> <p>2.1 could have been more clearly shown on a map, highlighting the location and volume of the growth figures.</p> <p>P2 transport infrastructure <i>Limited opportunity to improve highway infrastructure within the existing urban area.</i> Unclear by what is meant by this. It might be undesirable for a range of reasons to improve highway infrastructure for private car use, but it is desirable to improve it for public transport, and active travel.</p> <p>Unsure what is meant by <i>sustainable transport infrastructure</i> (which supports all modes of travel).</p> <p>P4 welcome that broadband and mobile phone signal are highlights as being critical.</p> <p>Unclear what is mean by improvements will still be required to reduce congestion - is this separate from facilitate mode shift</p>

Policy	Your comments
	<p>from car or different. It is very hard to reduce congestion without inducing demand.</p> <p>P6 Agree with the principal that locating housing close to jobs and service will reduce the need to travel. Also need to ensure this includes high quality telecoms for home working.</p>
<p>Greater Cambridge Local Plan Transport Evidence Report Preferred Option Update October 2021</p>	<p>Glossary at the front very helpful.</p> <p>Useful summary clearly setting out the work that has been carried out and the key findings.</p> <p>3.2.4 table 8 Figure 4 shows how car trips dominate mode share of all the options tested. However, it is noted that these predictions are based on no mitigation being in place and include existing trips and therefore any additional trips cause by Local Plan development would not be expected to create a significant mode shift given the small percentage.</p> <p>Table 11 and Figure 5 detail the mode share of additional trips generated by development in each spatial option compared to the mode share of the 2015 base year and the additional trips in the 2041 baseline. SO1 densification creates both the lowest number of new trips and has the highest non-car mode share. S02, S03 and S08 all performed similarly in both number of new trips and non-car mode share.</p> <p>Table 14 again shows that significant PCU-km and hrs are added to the road network under all development options. SO1 densification has the lowest impact.</p> <p>Agree with the statement that 5.2.1 that SO 1 Densification is the best performing against all metrics analysed in Chapter 3.</p> <p>5.3.1 states that SO1 densification is the most sustainable of the eight options- however it should be note that it relies on significant investment see 2.2.12 and it still adds car trips from the 2015 base. Significant mitigation measure in addition to the ones already included in the model are going to be required, if the Local Plan is going to achieve its objective of delivering sustainability, and there is clearly potential for the mitigation measures themselves to not be sustainable.</p> <p>11.1.3 it is noted that the proposed mitigation 'trip budget' policy approach which has identified as required for North East Cambridge, Cambridge East and Cambridge Biomedical Campus was not included in the assessment and mode share of car use for the larger sites within the Preferred Option are therefore likely to be over-estimated trips at this point. The use of 'trip budgets' is welcomed as a mitigation measure at other larger sites in the draft Local Plan such as the expansion of Cambourne.</p> <p>15.1.13 Provides a useful summary of the impacts of the Preferred Option for the emerging Local Plan, in transport terms, and provides reassurance from a transport perspective.</p>

Policy	Your comments
Infrastructure Topic Paper	<p>P6 It is clear that the public want to reduce the need to travel and ensure that sustainable travel options are available. Secondly it is clear that there is a desire for new developments to be supported with appropriate infrastructure.</p> <p>Highlights that all spatial options show an increase in the number of trips, time taken and delays on the highway network. Highlights that there is a need for further mitigation.</p> <p>4.5 Proposed Policy Direction</p> <p>This section is in line with CCC aims and goals. Welcome the requirement for a Low Emissions Strategy, as well as a focus on Active Travel which has numerous known benefits. In terms of transport related challenges, developments which are further away from existing transport links and with poor active travel links are likely to be the hardest to cater for.</p> <p>Welcome the report highlight that further work is required and that a policy needs to be put in place in addition to policy and plans that are already in place such as LTP.</p> <p>Chapter 5 will need updated following the recent announcements regarding the provision of EV charging points. https://www.bbc.co.uk/news/business-59369715</p> <p>5.5 welcome the cycle parking provision requirements and the need to accommodate non-standard cycles.</p> <p>6.2 A10 there is a fine balance between schemes that reduce congestion and those that create capacity and thus induce more traffic to use the road network.</p> <p>7. Potentially there is a requirement to safeguard land for East West Rail and ensure that enough land is safeguarded for aspects such as active travel provision and key transport improvements.</p> <p>8. Welcome that only development that is sustainable will be considered at Cambridge Airport. It is unclear how any airport/aviation development cannot have a significant adverse impact on the environment, given aviation's massive carbon emissions although it is noted that this may change in the future.</p> <p>9. Due to the likely uptake of electric vehicles it is likely that the power grid is going to require significant upgrades to support this.</p> <p>11. High speed broadband is an essential service. Broadband and high-quality mobile phone connections have a role to play in reducing the need to travel by supporting home working.</p>
Greater Cambridge Local Plan Strategic Spatial Options Assessment: Carbon Emissions Supplement.	Figure 4 highlights the annual carbon dioxide emissions per home in the mid-plan year 2030, with the medium growth options 1-8 and preferred growth options 9 and 10 with zero carbon policies.

Policy	Your comments
	In all growth scenarios transport emissions dominate carbon dioxide emission and are the only ones that change significantly as building energy use and building embodies carbon remain similar for all options.