



# **Cambridge Local Plan and South Cambridgeshire Local Plan**

## **Statement of Consultation to the Main Modifications Consultation**

**March 2018**

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## **1 Introduction**

- 1.1 As part of the ongoing examination of the Cambridge and South Cambridgeshire Local Plans, the Inspectors asked that consultation be carried out on Main Modifications they consider may be necessary in order for the Local Plans to be found 'sound'.
- 1.2 The main modifications have been proposed to ensure the Local Plans comply with the soundness tests set out in the National Planning Policy Framework. The consultation provided an opportunity for local residents and other key stakeholders to comment on the proposed main modifications. The consultation provided the opportunity to comment only on the specific changes identified.
- 1.3 Consultation took place from 5 January to 16 February 2018 on:
- Cambridge and South Cambridgeshire Main Modifications Consultation Report (RD/MM/010)
  - Sustainability Appraisal of Main Modifications (RD/MM/020)
- 1.4 This consultation statement provides an overview of the consultation undertaken and the key issues raised by the representations to each Plan. It also includes summaries (see Appendix B and C) of the comments received to the proposed modifications and the sustainability appraisal. It should be read in conjunction with the South Cambridgeshire Local Plan Statement of Consultation (March 2014) (RD/Sub/SC/090) and the Cambridge Local Plan Statement of Consultation and Audit Trails (March 2014) (RD/Sub/C/080) for details of the consultation undertaken prior to submitting the Local Plans in March 2014. The Proposed Modifications Report on Consultation (March 2016) (RD/MC/120) provides details of the Proposed Modifications consultation undertaken in December 2015.

## **2 Summary of consultation undertaken on the Post Hearing Main Modifications**

- 2.1 Formal notification of the consultation was given on 5 January 2018, and representations were invited for a six week period ending 5pm on 16 February 2018.

### Consultation arrangements

- 2.2 In accordance with each Council's Statement of Community Involvement, consultation arrangements included the following:
- Emails or letters informing consultees of consultation dates and how to view and respond to the consultation material were sent out at the

start of the consultation (refer to the March 2014 Statements of Consultation<sup>1</sup> for the list of consultees);

- Emails or letters to all representors from each of the earlier stages of plan making for both Local Plans informing of the consultation dates and how to view and respond to the consultation material were sent out at the start of the consultation;
- An advert was placed in the Cambridge News at the start of the consultation period, providing details of the consultation, including where the consultation documents would be made available to view (see Appendix A);
- All documents were made available on the Councils' websites, and at South Cambridgeshire Hall in Cambourne and Cambridge City Council's Customer Service Centre at Mandela House;
- Posters were sent to local libraries and Parish Councils to publicise the consultation, explain how to view the documents and make comments; and a request was made for the posters to be displayed.
- An article appeared in the Winter 2017 edition of South Cambs Magazine, which was delivered to every household in the district giving information about the consultation;
- Publicity for the consultation was carried out through the Councils' Facebook page and Twitter; including a short video.

### 3. Number of representations received

3.1 Representations received can be viewed on the Council's online consultation systems:

- Cambridge: <http://cambridge.jdi-consult.net/localplan/>
- South Cambridgeshire: <http://scambs.jdi-consult.net/localplan/>

3.2 In total there were 1,189 representations received on the Main Modifications and Sustainability Appraisal for both Local Plans. The breakdown for each plan was:

#### Cambridge Local Plan:

	Respondents	Representations
<b>Main Modifications</b>	42	261
<b>Sustainability Appraisal</b>	2	2

#### South Cambridgeshire Local Plan:

	Respondents	Representations
<b>Main Modifications</b>	511	916
<b>Sustainability Appraisal</b>	6	10

3.3 In addition, two representations were received by South Cambridgeshire and one by Cambridge on the Additional (minor) Modifications. As stated in the consultation material these minor modifications do not impact on the intent or

<sup>1</sup> Appendix A of the South Cambridgeshire Local Plan Statement of Consultation (March 2014) (RD/Sub/SC/090) and Appendix 1 of the Cambridge Local Plan Statement of Consultation and Audit Trails (March 2014) (RD/Sub/C/080).

interpretation of the policies of the plans or go to the heart of whether a plan is 'sound' or not. The material was clear that these did not form part of the consultation and were for completeness although any comments were welcome. They consist of changes such as typographical errors and factual updates. They do not formally form part of this consultation but are provided for completeness in this summary.

#### Cambridge Local Plan

- 3.4 The consultation proposed 257 main modifications in total to the Cambridge Local Plan. Comments were received to only 116 of these.
- 3.5 The 141 proposed modifications to the Cambridge Local Plan, for which no representations were received were modification numbers:  
4-6, 12, 21, 24, 26, 29-32,41-46, 49,52,55, 59-62, 66, 69, 72-74, 77, 79-82, 86-95, 97, 99, 108, 110, 112, 113, 115, 117-120, 123-127, 129, 130, 132-137, 154-156, 161-163, 157-174, 176-182,184, 185, 189, 190, 192, 194, 195, 197,198, 202-209, 225-235, 237-242, 245, 246, 248, 151-154, 256 & 257.
- 3.6 Of the 116 modification that were the subject of a representation, 54 modifications received only comments in support. These were modification numbers:  
1, 11, 13, 14, 17, 22, 25, 27, 34-36, 48, 50, 57, 63-65, 67, 68, 71, 84, 85, 131, 138, 139, 146, 147, 151, 152, 157-160, 164, 165, 183, 193, 196, 201, 211, 213, 216-221, 223, 224, 236, 247, 249 & 250.

#### South Cambridgeshire Local Plan

- 3.7 The consultation proposed 300 main modifications in total to the South Cambridgeshire Local Plan. Comments were received to only 129 of these.
- 3.8 There were 171 main modifications to the South Cambridgeshire Local Plan for which no representations were received. Main modification numbers:  
1, 2, 6, 7, 9, 10, 13, 15, 17, 21-23, 27-29, 32-35, 37-43, 46, 49, 51-52, 54-55, 60, 62, 64, 66, 68-71, 79, 83, 85, 87-88, 90, 92-94, 97-101, 103-104, 106-114, 118, 120, 122-123, 125-130, 135, 142-143, 146, 150, 152, 154, 156-160, 163, 168, 170, 175, 178, 180-183, 186-189, 191, 195-196, 198-200, 202-204, 206, 209-215, 218-220, 222-225, 227, 232, 235-237, 239, 241-243, 246-260, 263-265, 269, 271, 274, 278-283, 285-290, 294, 297-300
- 3.9 Of the 129 modification that were the subject of a representation, 43 modifications received only comments in support. These were modification numbers:  
11, 20, 44, 45, 50, 61, 77, 78, 86, 95, 105, 116, 117, 119, 121, 124, 131, 133, 139, 144, 149, 151, 153, 161, 190, 193, 205, 207, 216, 217, 221, 226, 228, 229, 230, 231, 244, 261, 275, 277, 292, 293, 295.

#### Sustainability Appraisal of Main Modifications

- 3.10 A total of 12 representations were received to the Sustainability Appraisal.



Two representations were received to the Sustainability Appraisal in relation to the Cambridge Local Plan and ten representations to the Sustainability Appraisal in relation to the South Cambridgeshire Local Plan.

#### **4. Summary of the main issues made to the Post Hearing Main Modifications consultation**

- 4.1 The following section provides a high level summary of the main issues raised in respect of each Plan. They relate only to modifications that received a significant number of representations, the majority of which were in objection. This is not intended to indicate the significance of the issues raised in individual representations, which will be a matter for the Inspector. A summary of all the representations received to each Plan, grouped around issues raised by main modification order, together with the Sustainability Appraisal of Main Modifications, is provided at **Appendix B & C**.

##### Cambridge Local Plan Key Issues

- 4.2 CC-MM016: Paragraph 2.74 –six representations were received to this modification, three in support and three in objection. Those in support welcomed the recognition being given to the importance of green infrastructure and its enhancement through the inclusion of the additional text and the figure showing Cambridge’s Natural Environment Strategy. The three in objection did not consider the proposed modification adequately represented a Natural Environment Strategy.
- 4.3 CC-MM018: After Paragraph 2.75 – received eight representations. Four of the representations supported an early review of the Local Plan, while the four in objection raised various concerns, including: that an early review would be a waste of resources; that it should be framed around the policies and strategies of the approved 2014 plan; that review should start immediately and submission should be by Spring 2021 (instead of summer 2022); that it should reference a review of the inner green belt boundary, it should consider the effectiveness of the city deal proposals for infrastructure and economic growth, and the wider development strategy; and that it should reference the need for an updated employment floorspace and distribution for specific employment uses and an assessment of the full range of employment requirements.
- 4.4 CC-MM028: Paragraph 3.24 – of the five representations received, the two in support welcomed the new text, while one in objection also welcomed the inclusion of heritage assets into the Policy but sought alternative wording. The other two objections considered that the term ‘local townscape’ was unclear and that the modification was not consistent with s72 of the Planning (Listed Buildings and Conservation Areas) Act 1990.
- 4.5 CC-MM037: Paragraph between 3.29 and 3.30 – all four representations objected to the modification. Three cited their objection to development applications being able to be made prior to the AAP for CNFE being adopted,

with one suggesting reference to ‘near the railway station’ would overcome this concern. The last objection considered the modification was inconsistent with the NPPF in restricting development until the AAP was substantively drafted.

- 4.6 CC-MM096: Table 5.2 and following paragraph 5.9 – all three representations raised concerns with the proposed modifications to the key employment sites citing a number of different reasons including: that the floorspace figures should be indicative to be determined through grant of planning permission; that it remained unclear how much employment land was available over the plan; an absence of evidence that the floorspace allocation for West Cambridge would come available; and that only permissions post March 2017 should be included.
- 4.7 CC-MM111: Paragraph 6.4 – all three representations objected to the removal of small sites between 2 and 9 units contributing towards affordable housing provision.
- 4.8 CC-MM114: Policy 46: Development of student housing, criterion e – the six representations received to this modification all objected to proposals for student housing having to be tied to an educational institution.
- 4.9 CC-MM116: After Paragraph after 6.13 – of the eight representations received to the modification, four were in support and four in objection. Those in support welcomed the need for new proposals for student accommodation to evidence the educational institution need they are intended to meet. In respect of the objections, two cited that the requirement to provide evidence of a link with an educational institution was inconsistent with the NPPF, one that the new paragraph included repetition, and one that the reference to Anglia Ruskin not having a growth aspiration to 2026 should be removed as circumstance may change.
- 4.10 CC-MM140: Policy 60: Tall buildings and the skyline – nine representations were received to the modification. The three in support felt that the modification provided greater protection to the historic environment. Of the six objections, four respondents considered that the height thresholds should be retained, while the other two suggested either deleting or amending the first sentence that defines a tall building as being that which breaks the existing skyline or is significantly taller than the surrounding built form.
- 4.11 CC-MM141: Insert six paragraphs to replace paragraphs 7.16 – 7.19 – of the seven representations, two supported the modification, with one of these suggesting ‘opportunities’ should be replaced with ‘proposals’. Those objecting considered that: the second paragraph is vague with the third sentence being inconsistent with the NPPF and a grammatical error in the last sentence; that the city is not free of clustered tall buildings, and that it pre-judges harm without proper assessment of a proposal.
- 4.12 CC-MM143: Paragraph 7.20 – received five representations. The two in support felt that the modification provided greater protection to the historic

environment. The three in objection considered the modification failed to recognise the international reputation of Cambridge as a historic city and its value to tourism.

- 4.13 CC-MM144 and CC-MM145: After Paragraph 7.22 and Figure 7.1 – of the five representations received only one was in support. The other four representations all considered that the list of documents, policies, guidance and organisations shown in Fig. 7.1 did not represent an Historic Environment Strategy and was therefore inconsistent with the NPPF. One objector also considered that the modification was unnecessary.
- 4.14 CC-MM148: Policy 62: Local heritage assets – received six representations, three in support and three in objection. Those in support considered that the modification would provide improved protection for heritage assets. One of the objectors considered the modification was unnecessary in imposing more onerous tests than advised by the NPPF, while the other two considered it was inconsistent with the NPPF and implied that similar tests should be applied to non-designated assets.

#### South Cambridgeshire Local Plan Key Issues

#### CHAPTER 2: SPATIAL STRATEGY

- 4.15 SC-MM012: After Paragraph 2.51 (new paragraph regarding neighbourhood plans) – of the 9 representations received, the 7 in support welcomed clarification on the opportunities provided by neighbourhood plans, two objections sought a change to highlight a site assessment process that should be undertaken as part of neighbourhood plans.
- 4.16 SC-MM014: After paragraph 2.54 (inclusion of part of Pampisford parish within Sawston development framework) – 5 objections, with reasons including planning applications for employment have not been refused previously because it is in Pampisford, and that other infill villages have employment areas. Pampisford Neighbourhood Plan area designation covers the whole parish, including this area. One representation of support, as it corrects an anomaly.
- 4.17 SC-MM016: Policy S/12: Phasing, Delivery and Monitoring – 10 objections. There was support for use of the 20% buffer, but the Sedgfield method should be used instead of the Liverpool method, for reasons including delays to housing delivery and failure to boost housing supply as required by national policy. As the plans could jointly meet Sedgfield requirements, the Liverpool method was unnecessary. Related to this, SC-MM018 (Paragraph 2.63) received 6 objections and 1 support, and SC-MM019 (paragraph 2.64) 5 objections and 2 supports.
- 4.18 SC-MM025: Figure 4: Monitoring Indicators – 4 supports, supporting the new monitoring indicators and clarity on method of calculating five year supply, and 5 objections, primarily related to the joint housing trajectory which forms one of the monitoring indicators.

- 4.19 SC-MM026: After proposed paragraph 2.70a (new policy regarding review of the Local Plan) – one support, as it reflects the rapidly changing context in the area, 9 objections raised various concerns, including: that an early review would be a waste of resources; that it should be framed around the policies and strategies of the approved 2014 plan; the review timetable should be more specific; that review should start immediately and submission should be by Spring 2021 (instead of summer 2022); that it should reference a review of the inner green belt boundary, the effectiveness of the city deal proposals for infrastructure and economic growth, and the wider development strategy; that it should reference the need for an updated employment floorspace and distribution for specific employment uses and an assessment of the full range of employment requirements; and that it should address the needs of travellers who meet the planning definition as well as those who do not.

### CHAPTER 3: STRATEGIC SITES

- 4.20 SC-MM056 to SC-MM076 - Policy SS/5 Waterbeach New Town – a total of 42 representations were received on the modifications to the policy and its supporting text, of which 24 were objections. 4 objections were to part 1 of the policy regarding site capacity, and in particular to the addition of the word approximately, and that capacity should not be left to the SPD. Others considered the capacity figure was an unreasonable constraint on the development. There was 1 support. Other objections to Policy SS/5 relate to the loss of Green Belt / separation and the potential for open space uses to be located off site and reduce separation, relocation of the railway station, and the reliance on a Supplementary Planning Document (SPD). There were also 18 representations supporting the SPD approach, measures to improve connectivity and modal share, the protection afforded to the historic environment including Denny Abbey and measures to ensure that infrastructure is phased and delivered in a timely way.
- 4.21 SC-MM077 to SC-MM092 - Policy SS/6 New Village at Bourn Airfield - a total of 199 representations were received on the modifications to the policy and its supporting text. SC-MM080 (the site) received 12 objections, that wording is too vague regarding the relationship with Cambourne and Highfields Caldecote. SC-MM081 (phasing and delivery and mix of land uses) received 12 objections, most seeking to retain reference to ThyssenKrupp site as an employment site to provide local employment. SC-MM082 (Measures to address landscape, townscape, and historic setting of new village, and deliver a high quality development) received 13 objections, who considered, the wording regarding woodland belt being too vague, and 1 support. SC-MM084 (creation of a comprehensive movement network) received 78 objections, most regarding vehicular access to the Bourn Broadway, and 2 support. SC-MM091 (Paragraph 3.41 regarding the preparation of a supplementary planning document) received 74 objections, with most considering that development should not come forward until public transport solutions are delivered. See also Modification SC-MM262: Bourn Airfield New Village map (paragraph 4.26)

## CHAPTER 7: DELIVERING HIGH QUALITY HOMES

- 4.22 SC-MM167: Policy H/11: Residential Space Standards for Market Housing – 4 objections, in particular that application of the standards is not properly evidenced.
- 4.23 SC-MM169 to SC-MM179 Policy H/19: Provision for Gypsies and Travellers and Travelling Showpeople and Policy H/21: Proposals for Gypsies, Travellers and Travelling Showpeople Sites on Unallocated Land Outside Development Frameworks, and supporting text - 16 objections from two organisations, challenging the robustness of the needs assessment, that the plan should include need as a range, including for travellers who do not meet the planning definition, and that a supplementary planning document should be prepared to deliver new sites.

## CHAPTER 8: BUILDING A STRONG AND COMPETITIVE ECONOMY

- 4.24 SC-MM184: Cambridge Biomedical Campus Extension – 9 objections and 1 support, objections raise issues including impact on biodiversity and the nearby nature reserve, harm to green belt, and the need for it not being demonstrated. Others seek changes to the policy, to protect public access, to include reference to both foul and surface water drainage, and to require the creation of an on-site area of high quality informal open space. SC-MM185: New supporting text to follow new Policy E/1B – received 3 supports, including from Natural England, and 2 objections, questioning whether the need for the site in the green belt had been properly demonstrated.

## APPENDICES AND POLICIES MAP

- 4.25 SC-MM238: After Appendix A: Supporting Studies and Evidence Base – 5 objections related to the method of calculating five year housing land supply. Issues include that the Liverpool method is unnecessary if assumptions regarding delivery of new settlements are correct.
- 4.26 SC-MM262: Bourn Airfield New Village map – 94 objections, raising issues including capacity of the site to accommodate the proposed development and related services and facilities, and separation from Highfields Caldecote.
- 4.27 SC-MM266 Bassingbourn Village Map SC-MM266d - The Rouses (NH/12-016) – 344 objections and 1 support, to the removal of this Local Green Space designation. Objections consider that it is demonstrably special, it is important for wildlife, recreation, is of historical significance, and is of significant community value.
- 4.28 SC-MM268: Cambourne Village Map – 6 objections to removal of Local Green Space designations from a number of sites.

## Sustainability Appraisal of Main Modifications Key Issues

- 4.29 Two representations were received to the Sustainability Appraisal in relation to the Cambridge Local Plan. Support from Natural England that the appraisal accords with requirements of regulations. Objection that the sustainability appraisal process did not consider reasonable alternatives to the joint housing trajectory, which is a breach of the SEA Regulations.
- 4.30 Ten representations were received to the Sustainability Appraisal in relation to the South Cambridgeshire Local Plan. Support from Natural England that the appraisal accords with requirements of regulations. Objection that alternatives to the Liverpool method and joint trajectory should have been tested. Objections were made regarding how the Appraisal addressed Bourn Airfield, and assumptions made regarding delivery of a secondary school and Park & Ride, and the transport impacts of the development, also how a larger development at Cambourne West was appraised. Objection was also raised to the way the impacts of the proposed modification concerning mortgagee in possession clauses in relation to rural exception sites were screened.

### **5. What happens next?**

- 5.1 The representations (in full) relating to the Main Modifications and the Sustainability Appraisal have been submitted to the Inspectors undertaking the examination.
- 5.2 The Inspectors will consider all the comments received and will decide whether any further hearings are necessary, or any issues need to be revisited. At the end of the examination process the Inspectors will present their final conclusions in their Reports into the examination of each Local Plan. If the plans are found 'sound', with any necessary modifications, they would be able to be adopted by the Councils.



## Appendix A: Advert placed in the Cambridge News on 5 January 2018



### Cambridge City Council & South Cambridgeshire District Council

### Cambridge Local Plan 2014: Proposed Submission and Submission South Cambridgeshire Local Plan 2014

### Notice of public consultation on Main Modifications Town and Country Planning (Local Planning) (England) Regulations 2012

The Councils are seeking comments on Main Modifications to the Cambridge Local Plan and South Cambridgeshire Local Plan. The Main Modifications are those that the Inspectors examining the plans have identified as may be necessary in order for the Local Plans to be found 'sound'. The Inspectors' final conclusions will be given in their Reports in due course.

Consultation on the Main Modifications and the associated Sustainability Appraisal of the Main Modifications will run from **9am Friday 5 January until 5pm Friday 16 February 2018**.

The documents will be available for inspection:

- **Online** on the Councils' websites (details below);
- At the Councils' offices during the following times:
  - **Cambridge City Council's Customer Service Centre** at Mandela House, 4 Regent Street, Cambridge, CB2 1BY: Monday to Friday: 9am to 5.15pm;
  - **South Cambridgeshire District Council offices** at Cambourne Business Park, Cambourne, Cambridge, CB23 6EA: Monday to Friday 8am to 5.30pm;

**Please submit your comments before 5pm on Friday 16 February 2018**, using:

- The interactive online response system for the **Cambridge Local Plan**, available at: <http://cambridge.jdi-consult.net/localplan/>
- The interactive online response system for the **South Cambridgeshire Local Plan**, available at: <http://scambs.jdi-consult.net/localplan/>
- Response forms - available from the Councils' offices (details above), or can be downloaded from the Councils' websites (details below) and printed or filled in electronically.

Responses should be limited to the Main Modifications proposed.



For further information, please look at the websites or contact the Planning Policy teams as follows:

**Cambridge City Council:**

Planning Policy Team  
Cambridge City Council  
PO Box 700  
Cambridge  
CB2 1BY

**Tel:** 01223 457200

**Email:** [policysurveys@cambridge.gov.uk](mailto:policysurveys@cambridge.gov.uk)

**Website:** [www.cambridge.gov.uk/mainmods](http://www.cambridge.gov.uk/mainmods)

**South Cambridgeshire District Council:**

South Cambridgeshire District Council  
Cambourne Business Park  
Cambourne  
Cambridge  
CB23 6EA

**Tel:** 01954 713183

**Email:** [ldf@scambs.gov.uk](mailto:ldf@scambs.gov.uk)

**Website:** <https://www.scambs.gov.uk/mainmods>

**Stephen Kelly**

Joint Director for Planning and Economic Development  
for Cambridge and South Cambridgeshire

Date of Notice: 5 January 2018

## Appendix B: Cambridge Local Plan Modifications - Summary of Representations

GENERAL COMMENTS	
Organisation	Comment
Cambridgeshire Police Headquarters Crime Prevention Design Team (Estates)	I have read through the proposed Modifications on both local plans. I have no comments and this office is happy to support both sets of Modifications.
Environment Agency	Following our inspection of the above document I confirm that we have no objection, in principle, to the proposed Main Modifications.
Hertfordshire County Council	HCC Property (Development Services) on behalf of HCC services have no comments to make on the Consultation on the Cambridge Local Plan and South Cambridgeshire Local Plan Main Modifications.
National Grid	We have reviewed the consultation document and can confirm that National Grid has no comments to make in response to this consultation.

### B1. Cambridge Main Modifications

Main Mod. Ref.	Local Plan policy / paragraph	Summary of issues raised in representations	Representation number(s)
<b>General</b>			
All	All	<u>Support</u> the schedule of modifications.	32284
<b>Section 2: Spatial Strategy</b>			
CC-MM001	Vision	<u>Support</u> Welcome reference to the city drawing inspiration from river is supported.	32221 32360 32393
CC-MM002	Figure 2.1: Key Diagram	<u>Support</u> the proposed modification at MM255 to include Newbury Farm within GB2 (and related MM002 to Key Diagram (Figure 2.1).	32485
		<u>Object</u> The scale of the map makes it impossible to determine what the modifications are.	32229 32234

Main Mod. Ref.	Local Plan policy / paragraph	Summary of issues raised in representations	Representation number(s)
CC-MM003	Table 2.1: Summary of other needs during the plan period, first row	<u>Support</u> concerned about the deletion of the target figure of rooms required by Universities. Council's student accommodation report did not go out to public consultation.	32403
		<u>Object</u> Do not accept the deletion of the target figure of 3,016 (net) rooms required by the University of Cambridge for undergraduates and postgraduates up to 2031 because a clear target for these universities is needed.	32317
CC-MM007	Policy 3: Spatial Strategy for the Local of Residential Development	<u>Support</u> Glad plan proposes no massive additional house-building in Cambridge	32232
		<u>Object</u> The release of Green Belt is not justified for new housing at the expense of valuable & extensive leisure area	32196
		<u>Object</u> The use of the Liverpool method is not sound. It is not the preferred approach in national guidance and is inconsistent with the aim to boost significantly the supply of housing.	32428
CC-MM008	Policy 3: Spatial Strategy for the Local of Residential Development	<u>Support</u> insertion that permanent purpose built student accommodation will not be supported on potential housing sites. Council's student accommodation report did not go out to public consultation. Concern about the impact that the expansion of student accommodation is having on the city's stock of affordable housing.	32404
		<u>Object</u> A site having 'potential' for housing in the future should not be a sufficient basis to restrict alternative uses such as Purpose Built Student Accommodation.	32344
		<u>Object</u> The revised wording fails to recognise there is a need for student accommodation as well as residential development. Modified Policy is not in line with Paragraph 154 of the NPPF.	32467
CC-MM009	Policy 3: Spatial Strategy for the Local of Residential Development	<u>Object</u> The use of the Liverpool method is not sound. It is not the preferred approach in national guidance and is inconsistent with the aim to boost significantly the supply of housing.	32429
CC-MM010	After paragraph 2.48	<u>Object</u> support commitment to producing both individual and joint housing trajectories but seek clarification/ justification on 5 Year Housing Land Supply calculation.	32492
CC-MM011	Policy 4: The Cambridge	<u>Support</u> the modification	32348

Main Mod. Ref.	Local Plan policy / paragraph	Summary of issues raised in representations	Representation number(s)
	Green Belt		
CC-MM013	Policy 7	<u>Support</u> concerned no mention of cultural and historic character of the River and its landscapes and important contribution they make to Cambridge as a world famous heritage city. Need a strategy for ensuring city's cultural and historic character secure given all the growth pressures.	32408
CC-MM014	Paragraph 2.69	<u>Support</u> Pleased the River Cam corridor is to be further protected.	32197 32230
		<u>Support</u> Welcomes the additional sentences, especially the need to bring Policy 7, The River Cam, into line with NPPF Para 117.	32318
		<u>Support</u> The amendments to recognise that the River Cam and its associated floodplain habitats and tributaries function together as an ecological network, which requires enhancement, in line with paragraph 117 of the NPPF.	32405
CC-MM015	Policy 8: setting of the city	<u>Support</u> Welcomes the specific reference to the Cambridgeshire Green Infrastructure Strategy.	32319 32369
		<u>Support</u> the modification	32351
		<u>Support</u> Changes are in line with changes agreed through the Statement of Common Ground between Cambridge City Council and Natural England, dated May 2016. Satisfied these address our outstanding concerns relating to green infrastructure and protection of best and most versatile (BMV) land.	32409
		<u>Object</u> Believes a good landscape setting for the approaches and special character of the City is important, so do not understand why 'landscape' and 'approaches' are being deleted	32370
		<u>Object</u> It should be noted that green infrastructure can be enhanced in conjunction with development. The reference to agricultural land should be deleted.	32473
CC-MM016	Paragraph 2.73	<u>Support</u> Open spaces are an essential part of the character of Cambridge and their importance needs to be specifically recognised.	32350
		<u>Support</u> Supports the attempts to incorporate strategic enhancement of the natural environment into the Local Plan.	32217

Main Mod. Ref.	Local Plan policy / paragraph	Summary of issues raised in representations	Representation number(s)
		<u>Support</u> All the proposed amendments which are in line with changes agreed through the Statement of Common Ground between Cambridge City Council and Natural England, dated May 2016. Satisfied these address our outstanding concerns relating to green infrastructure and protection of best and most versatile (BMV) land.	32410
		<u>Object</u> The requirements of NPPF para 117 is not being met or complied with. <u>Object</u> to the fact that there is not a sufficient Natural Environment Strategy in place.	32320
		<u>Object</u> The statement and diagram are a precursor to a strategy but are not a strategy. There is no strategic assessment of issues, no clear statement of priorities and no overall strategy.	32310
		<u>Object</u> unsatisfactory attempt to provide a Natural Environment strategy? Joined up approach needed - Cambridge's open spaces have both historic interest as well as environmental and nature interest. No consideration for natural assets at risk.	32424
CC-MM017	New paragraph after paragraph 2.74	<u>Support</u> All the proposed amendments which are in line with changes agreed through the Statement of Common Ground between Cambridge City Council and Natural England, dated May 2016. Satisfied these address our outstanding concerns relating to green infrastructure and protection of best and most versatile (BMV) land.	32412
		<u>Support</u> restoration of urban edge farmland to a rich diversity that makes it both productive and attractive to wildlife and humans. Footpaths through well-farmed countryside could be just as appealing as country parks and ultimately more relevant.	32426
CC-MM018	After paragraph 2.75	<u>Support</u> Welcome new para 2.76 but would like inclusion to the environmental capacity of Cambridge	32427
		<u>Support</u> the modification	32349
		<u>Support</u> The evidence base is now 5 years old or more and significant changes to context have taken place since e.g. Cambridge Biomedical Campus	32238
		<u>Support</u> Consistent with paragraphs 153 and 157 of the NPPF. Agree that in	32383

Main Mod. Ref.	Local Plan policy / paragraph	Summary of issues raised in representations	Representation number(s)
		order to arrive at a sound housing needs assessment, the inclusion of students is vital, given that they make up such a large part of the population within the City of Cambridge.	
		<u>Object</u> The new Local Plan should be framed around policies and strategies approved in the 2014 Local Plan to ensure continuity: appropriate wording proposed.	32321
		<u>Object</u> Plan should be valid until 2031, reviewing early wastes resources.	32190
		<u>Object</u> No reference to the economy or employment/job creation. Contrary to the NPPF Reference should be made to the need for an updated assessment of employment floor space and distribution for specific employment uses	32431
		<u>Object</u> does not provide a deadline for the start of a local plan review and submission of plan for examination. Text should refer to the implications of the City Deal (GCP) proposals for meeting housing need and on wider spatial and transport planning. The refresh of the spatial strategy and housing requires a review of Green Belt evidence.	32483
<b>Section 3: City Centre, areas of major change and site specific proposals</b>			
CC-MM019	Policy 10: Development in the City Centre Primary Shopping Area	<u>Support</u> the widened definition of city centre uses as proposed. This list of uses are now in line with those set out in the NPPF. Notwithstanding this, given the range of uses which are now supported above ground floor level, caution should be exercised and appropriate consideration given in the determination process in order to protect the amenity of neighbouring uses.	32389
CC-MM020	Paragraph 3.7	<u>Object</u> opposes the deletion in principle of the proposal that there should be no further loss of retail in the City Centre Primary Shopping Area because retail should continue to be the predominant use.	32322
CC-MM022	Policy 11: Fitzroy/ Burleigh Street / Grafton Area of Major Change	<u>Support</u> Welcomes reference to the character and setting of the historic core, which affords greater protection	32237 32371

Main Mod. Ref.	Local Plan policy / paragraph	Summary of issues raised in representations	Representation number(s)
CC-MM023	Paragraph 3.10	<u>Object</u> to student accommodation being provided in the Grafton area. It should be affordable housing.	32296
		<u>Object</u> Wording is inconsistent with the NPPF in terms of restricting student accommodation at this location to meeting the needs of Anglian Ruskin University.	32462
CC-MM025	Paragraph 3.17	<u>Support</u> the proposed development North of Cherry Hinton at Church End/Teversham Drift.	32323
CC-MM027	Policy 13: Area of Major Change and Opportunity Areas	<u>Support</u> Welcomes reference to heritage assets	32239 32372
CC-MM028	Paragraph 3.24	<u>Support</u> Welcomes reference to conservation areas.	32240
		<u>Support</u> Welcomes new text	32434
		<u>Object</u> Welcomes the inclusion of heritage assets in Policy 13 and the reference to Conservation Areas in Para 3.24. Proposes the second inserted sentence should be strengthened: "Buildings that make a positive contribution to local townscape, including Buildings of Local Interest, should generally be retained and integrated into development."	32324 32373
		<u>Object</u> Not consistent with S72 of the Planning (Listed Buildings and Conservation Areas) Act 1990.	32407
		<u>Object</u> 'local townscape' definition is unclear	32407
CC-MM033	Policy 14: Northern Fringe East and land surrounding the proposed Cambridge Science Park station	<u>Support</u> Welcomes the deletion from the 3rd paragraph of how planning applications will only be considered when the area action plan has been adopted from the paragraph.	32288
		<u>Object</u> Believes an AAP is required in order to prevent piecemeal development so that infrastructure and transport issues are looked upon more widely.	32326 32374
CC-MM034	Policy 14 Northern Fringe East – Paragraph 4	<u>Support</u> The modification to protect and enhance locally important biodiversity sites, including Bramblefields Local Nature Reserve and supporting habitat, and to provide ecological mitigation, compensation & enhancements.	32413

Main Mod. Ref.	Local Plan policy / paragraph	Summary of issues raised in representations	Representation number(s)
CC-MM035	Paragraph 3.28	<u>Support</u> updated terminology to Cambridge Water Recycling Centre.	32402
		<u>Support</u> that development within the boundary should not prejudice the development of the wider area.	32402
CC-MM036	Paragraph 3.29	<u>Support</u> Welcomes replacing the words St John's Innovation Centre with the words St John's Innovation Park to indicate a series of buildings rather than just one building.	32287
CC-MM037	Insert new paragraph between paragraphs 3.29 and 3.30	<u>Object</u> to wording and proposes a rewording adding a reference to how 'planning applications for early phases of development <i>near the railway station</i> may be made.'	32289
		<u>Object</u> to the breach of principle that planning applications may be accepted for early phases of the work before the AAP has been adopted.	32327 32375
		<u>Object</u> the proposed additional supporting text to Policy 14 is overly restrictive and contrary to the whole ethos of the NPPF which seeks to deliver sustainable development and economic growth. Such an approach is therefore clearly inconsistent with National Policy and is unsound.	32456
CC-MM038	Paragraph 3.30	<u>Object</u> Paragraph should include reference to the need to explore all options for the relocation of both the Waste Water Treatment Centre and for the aggregates rail head.	32325
CC-MM040	Paragraph 3.32	<u>Object</u> Remove reference to a smaller scale facility being provided on site.	32400
CC-MM047	Policy 15: South of Coldham's Lane Area of Major Change	<u>Object</u> Needs baseline date of 2005 added against which to assess the achievement of ecological mitigation and enhancement	32216
CC-MM048	Paragraph 3.37 of supporting text to Policy 15: South of Coldham's Lane Area of Major Change	<u>Support</u> The additional requirement for ecological enhancement as part of any redevelopment on site and provision of enhanced wildlife habitat and publicly accessible open space.	32417
CC-MM050	Policy 17: Southern Fringe Areas of Major Change – Criterion G	<u>Support</u> Welcomes reference to the importance of a high quality urban edge as providing greater protection for the setting of the historic city of Cambridge	32241



Main Mod. Ref.	Local Plan policy / paragraph	Summary of issues raised in representations	Representation number(s)
CC-MM051	Policy 18: West Cambridge Area of Major Change	<u>Support</u> Welcome reference to the need for appropriate building heights and consideration to the sensitivity of the landscape to the south and west	32242
		<u>Object</u> Organisations must show compelling reason of their need for co-locating within the University of Cambridge. Building heights must be sensitive to adjacent Green Belt.	32329
		<u>Object</u> The Changes are not consistent with the SoCG – Part 1 ‘be submitted should not be replaced by ‘come forward’	32236
		<u>Object</u> The Changes are not consistent with the SoCG – Part 3c, the requirement for a revised masterplan to be submitted and agree is not in accordance with text at para 3.70.	32236
		<u>Object</u> The Changes are not consistent with the SoCG – Parts 3e & f, the addition of ‘landscape’ referring to Green Belt sensitivity does not relate to the purpose of Green Belt in the NPPF.	32236
CC-MM053	Paragraph 3.68 – 3.70	<u>Object</u> Original text more appropriate - Allocating more land to industry, is inappropriate.	32191
		<u>Object</u> West Cambridge should be reserved for the University of Cambridge,	32191
CC-MM054	Policy 19: NIAB 1 Area of Major Change	<u>Object</u> Questions why has the need to compensate adequately for the loss of the existing Christ's and Sidney Sussex sports grounds been deleted? This seems to contradict the Council's policy 73.	32330 32433
CC-MM056	Policy 20: Station Areas West and Clifton Road Area of Major Change.	<u>Object</u> The insertion of the word "major" risks the area being overrun with many minor developments without an overall plan.	32193
CC-MM057	Criterion q of Policy 20: Station Areas West and Clifton Road Area of Major Change.	<u>Support</u> Welcomes reference to a possible foot and cycle eastern entrance to the railway station.	32291 32297
CC-MM058	Paragraph 3 of Policy 21: Mitcham's Corner Opportunity Area.	<u>Object</u> The insertion of the word "major" risks the area being overrun with many minor developments without an overall plan.	32194

<b>Main Mod. Ref.</b>	<b>Local Plan policy / paragraph</b>	<b>Summary of issues raised in representations</b>	<b>Representation number(s)</b>
CC-MM063	Paragraph 3.91	<u>Support</u> 3D modelling is a good idea. It should be a requirement to provide it for many more major applications.	32300
CC-MM064	Criterion c of Policy 23	<u>Support</u> Mill Road Opportunity Area providing space (generous, I trust) as well as good access for the Chisholm Trail.	32305
CC-MM065	Criterion e of Policy 23 Mill Road Opportunity Area	<u>Support</u> I support the direction of this modification but given Policy 86, para 3.93, the exact meaning of 'improved' is hazy, 'eider' would be better.	32435
CC-MM067	Paragraph 3.93	<u>Support</u> Welcome reference to the Mill Road Conservation Area which provides clarity of the status of the area	32243
CC-MM068	Paragraph 3.96	<u>Support.</u> Welcomes adding traffic calming as an example of a benefit of development proposals.	32292 32298
CC-MM070	Figure 3.10	<u>Support</u> Welcomes the inclusion of all listed buildings including the Bharat Bhavan	32244
		<u>Object</u> Fails to identify listed buildings, the former library as a listed building at Risk, and is contrary to paras 1226 and 131 of the NPPF	32316
CC-MM071	Figure 3.10	<u>Support</u> Welcome showing the Mill Road Conservation Area on the Map which provides clarity on the status of the area	32245
CC-MM075	Paragraph 3.102	<u>Object</u> The indicative capacity for 350 student rooms is supported but should not be subject to further testing. Student accommodation needs have been assessed objectively and the Plan should plan to meet such needs. There are already policies to protect heritage assets.	32224
CC-MM076	Paragraph 3.103	<u>Support</u> Welcome reference to the Historic Core Conservation Area Appraisal as will afford greater protection to the historic environment.	32246
		<u>Object</u> The Council's most recent HCCA should not take precedents in respect of an assessment of heritage assets or their significance or over the adopted SPD for Mill Lane /old Press site	32225
		<u>Object</u> Inconsistent with NPPF which requires a balance between harm to a heritage asset and public benefits. Prioritises Conservation Area Appraisal over SPD.	32411
<b>Section 4: Climate change and balancing resources</b>			
CC-MM078	Policy 27 - Carbon	<u>Support</u> Welcomes the insertion in the final sentence that the significance of the	32331

Main Mod. Ref.	Local Plan policy / paragraph	Summary of issues raised in representations	Representation number(s)
	reduction, community energy networks, sustainable design and construction and water use	heritage asset must be balanced by the potential harm to the asset from the insensitive imposition of energy saving mechanisms. The final sentence could be strengthened by including the statement that harm to listed buildings must be avoided.	
		<u>Object</u> Queries why the water efficiency requirement is being relaxed if water availability from the chalk aquifer may not be sufficient to meet the future city's demands	32386
CC-MM083	Policy 33: contaminated land	<u>Object</u> To talk therefore of 'no deterioration' being caused as a passable state of affairs is totally inadequate when we (UK) should be taken to court for our present failures to meet the European Water Framework Directive.	32463
CC-MM084	Paragraphs 4.40 – 4.44	<u>Support</u> Welcomes the revised text to Policy 33, especially its strengthened commitment to address ground water contamination.	32332
CC-MM085	Policy 35 Protection of human health from noise and vibration	<u>Support</u> Welcomes text amendments covered by the amendments to Policy 35 as will strengthen the wording. Also welcome are the insertions to Paras 4.47 and 4.48. Queries whether the original Table 4.2 has been deleted or just its caption - if the former it should be reinstated as the Noise Exposure Categories form a useful planning tool in conjunction with the map in the new Figure 4.4.	32333
<b>Section 5: Supporting the Cambridge economy</b>			
CC-MM096	Table 5.2 and following paragraphs 5.9	<u>Object</u> to wording about the precise amount of employment floorspace and proposes rewording the paragraph to indicate that floorspace will also be determined by any planning permission granted.	32290
		<u>Object</u> The inserted Para 5.9b refers to Table 5.2 as sites with planning permission at 31st March 2012 whereas this should be the year 2017.	32334
		<u>Object</u> It is not clear how much land is actually available for employment use within the plan period. Recommend that such a column is inserted.	32432
		<u>Object</u> No evidence to demonstrate that this level of floor space may become available at West Cambridge and no timescale for its delivery. Considered to be premature and unjustified.	32432

Main Mod. Ref.	Local Plan policy / paragraph	Summary of issues raised in representations	Representation number(s)
CC-MM098	Policy 41: Protection of business space	<u>Object</u> The policy as a whole is too inflexible with regards to employment sites outside protected industrial sites.	32490
CC-MM107	Paragraphs 5.28 – 5.31	<u>Support</u> Needs to be even stronger	32449
		<u>Object</u> Deleting a clear statement supporting growth of specialist colleges and language schools is a backward step and is contrary to paragraph 19 of the NPPF. The following amendment to the final sentence of paragraph 5.31 is proposed: <i>The Council considers it appropriate to support the expansion of such colleges and schools where they manage the impacts of their growth.</i>	32293
<b>Section 6: Maintaining a Balanced Supply of Housing</b>			
CC-MM109	Policy 45 affordable housing and dwelling mix	<u>Object</u> Oppose the deletion of any commitment to affordable housing on schemes of between 2 and 10 dwellings.	32335
		<u>Object</u> the modified policy is not in accordance with paragraph 154 of the NPPF. The policy wording should be modified to make clear reference to the fact that requirements for affordable housing provision may only be reduced where it can be demonstrated that provision would render a development proposal unviable.	32488
CC-MM111	Paragraph 6.4	<u>Object</u> Oppose the 11 dwelling threshold as small sites make a contribution to the provision of affordable housing	32336
		<u>Object</u> There is a real need for affordable housing, so the proposed deletions should remain.	32376 32436
CC-MM114	Policy 46: Development of student housing, criterion e	<u>Object</u> The modification should, recognise that student accommodation serves more than one educational institution. References to 'institution' should be amended to 'institutions'.	32294 32390
		<u>Object</u> Where a formal agreement is necessary this should be secured through condition in line with NPPF paragraph 203 regarding the use of conditions and S106.	32294 32390
		<u>Object</u> Sentence two of the insertion, should be deleted as it is repetition and not necessary.	32294
		<u>Object</u> 'Effective management' as referred to in the third sentence of the	32294

Main Mod. Ref.	Local Plan policy / paragraph	Summary of issues raised in representations	Representation number(s)
		insertion is covered in the policy criteria and should be deleted.	32390
		<u>Object</u> Amend second, third and fourth sentence as follows to ensure the Plan is consistent with the NPPF: Schemes should demonstrate that they have entered into a formal agreement with at least one existing educational establishment within Cambridge providing full-time courses of one academic year or more. The Council will seek appropriate controls to ensure that within academic terms the approved schemes are occupied solely as student accommodation for identified institutions.	32294
		<u>Object</u> A site having 'potential' for housing in the future should not be a sufficient basis to restrict alternative uses such as Purpose Built Student Accommodation.	32345
		<u>Object</u> GCP is attempting to bring about modal shift to walking, cycling and public transport. It is therefore appropriate to retain the statement at (e) "ensure students do not keep cars in Cambridge".	32377 32437
		<u>Object</u> The proposed changes to the first paragraph are unreasonable. There is benefit in providing a range of student accommodation on certain sites which can cater for a wider need. The final paragraph to be introduced provides no justification on why these sites should be subject to protection.	32457
		<u>Object</u> Clarity should be provided to 'outside-academic terms'.	32390
CC-MM116	New Paragraph after Paragraph 6.13	<u>Support</u> Welcomes restraining the growth of student accommodation and thereby ensure land for residential housing	32231 32378
		<u>Support</u> Welcomes the inclusion of the need to provide evidence to show a linkage between proposed new student accommodation with at least one higher or further educational institution, and for that institution to confirm in writing as part of the planning application that the accommodation will be used exclusively by students of the institution undertaking full-time courses of one academic year or more.	32337 32447
		<u>Object</u> Sentence two of the insertion, should be deleted as it is repetition and not necessary.	32307
		<u>Object</u> ' Remove 'While Anglia Ruskin has confirmed that it has no growth	32346

Main Mod. Ref.	Local Plan policy / paragraph	Summary of issues raised in representations	Representation number(s)
		aspiration to 2026', as circumstances could change, or replace with 'While Anglia Ruskin University do not currently have growth aspirations in the immediate term, the University has also identified that circumstances and demand are variable and can be subject to rapid change'.	
		<u>Object</u> Materially inconsistent with the evidence base which does exist and is inconsistent with the NPPF. It should not be a requirement to provide evidence of a linkage with a particular higher or further education provider.	32459
		<u>Object</u> Not in accordance with advice in the PPG & could be achieved through the implementation of policy 8a, part a.	32399
CC-MM121	Paragraph 6.22	<u>Object.</u> The wording with the reference to 'aspire' is vague and inappropriate.	32484
CC-MM122	Policy 49: Provision for Gypsies and Travellers	<u>Object</u> dispute the lack of need but if accepted then paragraph 10 of Planning Policy for Traveller Sites comes into play, that requires criteria based policies be set to guide decisions. Policy 49 in its present form does not comply with national guidance as it requires a need to be established before favourable consideration can be given.	32286
CC-MM128	Policy 51: Lifetime Homes and Lifetime Neighbourhoods	<u>Object</u> NPPG is clear that LPAs should robustly demonstrate the need for Requirement M4(2) (accessible and adaptable dwellings), and/or M4(3) of the Building Regulations. Not evidenced by the Council. The policy should be modified to reflect viability requirements.	32479
		<u>Object</u> Evidence used to justify the changes to the policy has not been previously consulted upon.	32382
CC-MM131	Paragraph 6.34	<u>Support</u> making it clear how housing suitable for those with mobility issues needs to be designed. Suggest adding cycle parking/facilities these are used as mobility aids.	32301
<b>Section 7: Protecting and enhancing the Character of Cambridge</b>			
CC-MM138	Policy 57: Designing New Buildings criterion h	<u>Support</u> The amendment to include a requirement for inclusion of an appropriate scale of features and facilities to maintain and increase levels of biodiversity in the built environment	32414
CC-MM139	Para 7.10	<u>Support</u> The amendment to require that new developments should have regard for and maximise opportunities to incorporate features that support biodiversity	32415

Main Mod. Ref.	Local Plan policy / paragraph	Summary of issues raised in representations	Representation number(s)
CC-MM140	Policy 60: tall buildings and the skyline	<u>Support</u> Welcomes the modification as it provides greater protection to the historic environment in relation to proposals for tall buildings.	32247 32352
		<u>Support</u> Welcome the reference to the Historic England advice note	32247
		<u>Support</u> Accept the removal of the height thresholds of 19m and 13m in the original text.	32338
		<u>Object</u> Considers that the height thresholds of 19m and 13m should be retained as its replacement by “significantly taller than” provides no guarantee that a development will not dominate the skyline and overshadow heritage buildings.	32379 32453
		<u>Object</u> Where there are doubts/disagreement to impacts on views the critical thresholds provide a hard and fast, unarguable and objective final building height.	32347
		<u>Object</u> Considers that the height thresholds of 19m and 13m should be retained as developers will use the ambiguity of “significantly taller than” to force through inappropriate developments on an unwanted scale	32452
		<u>Object</u> First sentence unnecessary. Need to clarify that relevant viewpoints are in Figure F3 of Appendix F. Historic England Guidance has now been superseded.	32416 32391
		<u>Object</u> suggested that the wording be modified to ‘Any proposal for a structure which is significantly taller than the surrounding built form will be considered against the following criteria...’	32391
CC-MM141	After Policy 60, insert six paragraphs to replace paragraphs 7.16 to 7.19	<u>Support</u> Last sentence of the first para is confusing, suggest replacing ‘opportunities’ with ‘proposals’	32454
		<u>Support</u> Welcomes the modification as it provides greater protection to the historic environment in relation to proposals for tall buildings	32248
		<u>Object</u> City is not free of clustered tall buildings, see CB1 and North West of Milton Road.	32195
		<u>Object</u> Pre-judges, without assessment of proposals, that tall buildings are likely to result in a high level of harm.	32226
		<u>Object</u> Proposals for tall buildings should be considered within the context of a thorough analysis of the historic city in its wider landscape setting	32468

Main Mod. Ref.	Local Plan policy / paragraph	Summary of issues raised in representations	Representation number(s)
		<p><u>Object</u> The second paragraph is vague and it is not clear how a range of heights can set 'height thresholds'. There is a grammatical error in the last sentence of this paragraph.</p> <p>The third paragraph is inconsistent with national policy.</p> <p>Guidance in final paragraph has now been superseded.</p> <p>Reason for modifications is unclear.</p>	32423
		<p><u>Object</u> The second paragraph is vague and it is not clear how a range of heights can set 'height thresholds'. There is a grammatical error in the last sentence of this paragraph.</p>	32423
		<p><u>Object</u> The third paragraph is inconsistent with national policy.</p>	32423 32392
		<p><u>Object</u> Guidance in final paragraph has now been superseded.</p> <p>Reason for modifications is unclear.</p>	32423 32392
CC-MM142	Policy 61: Conservation and Enhancement of Cambridge's Historic Environment	<p><u>Support</u> provides greater protection to the historic environment.</p>	32249 32281 32353
		<p><u>Support</u> Welcomes the requirement that new buildings must be sensitive to the character and appearance of its setting in terms of its form, height and mass.</p>	32339 32380 32381
		<p><u>Support</u> Welcomes the additional text but queries why, given the historical and cultural importance of Cambridge, there is no attempt to see the whole of Cambridge as a heritage asset.</p>	32455
		<p><u>Object</u> Subparagraph d is unnecessary. It adds nothing material to what is said in subparagraph c and it is not clear what 'the area' to which it refers is.</p>	32438
CC-MM143	Paragraph 7.20	<p><u>Support</u> provides greater protection to the historic environment and makes connection between the historic and natural environment.</p>	32250 3235
		<p><u>Object</u> it fails to recognise the international reputation of Cambridge as an historic city and the importance of this to its tourism; and secondly, it does not give sufficient appreciation to the importance of conserving the city's built environment.</p>	32340



Main Mod. Ref.	Local Plan policy / paragraph	Summary of issues raised in representations	Representation number(s)
		<u>Object</u> Shows no strategic awareness or consideration of the city of Cambridge as a heritage asset as a whole, whose survival depends on balancing growth with protecting its historic fabric and environmental capacity.	32466
		<u>Object</u> it fails to recognise the international reputation of Cambridge as an historic city and the value of this to tourism. Delete 'against the backdrop of a successful, growing city' as this is contradictory.	32458
CC-MM144	New Paragraph after Paragraph 7.22	<u>Support</u> Shows the inter-relationships between the different elements of the historic environment strategy for the city	32252
		<u>Object</u> The proposed approach is not a strategy. It does not meet the requirements of para 126 of the NPPF.	32406 32460 32441 32394
		<u>Object</u> New paragraph is unnecessary and there is no evidence as to why it has been inserted.	32441
CC-MM145	Insert new Figure 7.1 after Paragraph 7.22	<u>Support</u> Shows the inter-relationships between the different elements of the historic environment strategy for the city.	32253
		<u>Object</u> New Figure 7.1 does not meet the requirements of NPPF Para 126: Policy 61 therefore does not conform to the NPPF in that it has no dedicated HES	32341
		<u>Object</u> The list of documents, policies, guidance and organisations shown in Fig. 7.1 does not represent a strategy. Neither the diagram nor the words meet the requirements of para 126 of the NPPF. Transport proposals to support planned growth need to be drawn up within effective environmental safeguards.	32442 32465 32443 32395
CC-MM146	Paragraph 7.23	<u>Support</u> Provides greater protection to the historic environment and more accurately reflects the NPPF	32254
CC-MM147	Paragraph 7.24	<u>Support</u> More accurately reflects the legislation	32255
CC-MM148	Policy 62: Local Heritage Assets	<u>Support</u> Provides for improved protection for heritage assets	32256 32282 32355
		<u>Object</u> Not necessary to make the Plan sound and imposes more onerous tests	32227

Main Mod. Ref.	Local Plan policy / paragraph	Summary of issues raised in representations	Representation number(s)
		than advised by the NPPF	
		<u>Object</u> Inconsistent with NPPF pgh 135. Implies that similar tests should be applied to non-designated assets	32444 32396
CC-MM149	Policy 63: Works to a Heritage Asset to Address Climate Change	<u>Support</u> Provides greater protection to the historic environment and more accurately reflects the NPPF	32257 32283 32356
		<u>Support</u> Could be further improved by referencing British Standard BS 7913:2013	32470
		<u>Object</u> The historic evolution or construction of a heritage asset is only of relevance if it is important to the heritage significance of the asset.	32401
CC-MM150	Paragraph 7.30	<u>Support</u> Provides greater protection to the historic environment	32258
		<u>Support</u> Could be further improved by referencing British Standard BS 7913:2013	32472
		<u>Object</u> The final sentence implies that any 'harm' is unacceptable, rather than this being balanced against the benefits. The meaning and relevance of the word 'integrity' is also questioned.	32397
CC-MM151	Paragraph 7.31	<u>Support</u> Provides greater clarity	32259
CC-MM152	Policy 67: Protection of Open Space	<u>Support</u> Recreational uses can possible be replicated elsewhere, but environmental importance is unique to each open space. The deletion of 'uses' goes some way to emphasising the protection of sites that are of environmental and/or environmental & recreational importance	32357
CC-MM153	Paragraph 7.44	<u>Support</u> Anything that strengthens the protection of open spaces needs support.	32358
		<u>Object</u> The policy makes no differentiation between Protected Open Space and undesignated space.	32295 32398
		<u>Object</u> Policies 55, 56, 57, 58 and 59 all require an assessment of the impact on open space.	32295 32398
		<u>Object</u> Paragraph 7.43 already explains that an assessment will be required against the criteria in Appendix I.	32295 32398
		<u>Object</u> It is unjustified to require an assessment for every proposal where open space may be lost without reference to their status, value or designation.	32295 32398

Main Mod. Ref.	Local Plan policy / paragraph	Summary of issues raised in representations	Representation number(s)
		<u>Object</u> Application requirements should be proportionate to the scale, complexity and constraints of a particular scheme and should adhere to the NPPF paragraph 193 and Planning Practice Guidance paragraph 038 (Reference 14-038-2014036).	32295 32398
		<u>Object</u> The policy already makes it explicit that development proposals will not be permitted which would harm the character or lead to the loss of open space of environmental and/or recreational importance.	32295 32398
CC-MM157	Policy 69: Protection of Sites of Local Nature Conservation Importance	<u>Support</u> Supported but lack of reference to net gain in biodiversity is a failure that needs to be picked up in next plan	32220
		<u>Support</u> Any strengthening to policy protecting site of nature conservation importance is to be supported.	32359
		<u>Support</u> All of the proposed amendments are in line with changes agreed through the SoCG, in accordance with paragraph 118 of the NPPF.	32418
CC-MM158	Insert two additional paragraphs prior to Paragraph 7.57	<u>Support</u> Welcomes reference to ecological networks although hope a much stronger and more explicit approach is taken in the next plan	32218
		<u>Support</u> All of the proposed amendments are in line with changes agreed through the SoCG, in accordance with paragraph 118 of the NPPF.	32419
		<u>Support</u> Welcomes the recognition for protection of sites of a significance with the potential for international designation as if they were actually designated.	32342
CC-MM159	Paragraph 7.57	<u>Support</u> All of the proposed amendments are in line with changes agreed through the SoCG, in accordance with paragraph 118 of the NPPF.	32420
CC-MM160	Paragraph 7.59	<u>Support</u> All of the proposed amendments are in line with changes agreed through the SoCG, in accordance with paragraph 118 of the NPPF.	32421
CC-MM164	Policy 73: Community Sports and Leisure Facilities	<u>Support</u> The modification will require applicants to have regard to the recently completed sports strategies evidence bases for Cambridge/South Cambs.	32384
CC-MM165	Paragraph 8.11	<u>Support</u> The modification requires the consideration of the need for sports facilities in appropriate areas of major change.	32385
CC-MM166	Paragraphs 8.13 and 8.14	<u>Object</u> Given that Cambridge City Football Club has been trying to gain approval	32302

Main Mod. Ref.	Local Plan policy / paragraph	Summary of issues raised in representations	Representation number(s)
		for just such a stadium.	
		<u>Object</u> The reference that the playing pitch strategies did not identify a need for a community stadium. These strategies did not assess the need for a Community Stadium within the area.	32387
<b>Section Eight: Services and local facilities</b>			
CC-MM175	After paragraph 8.49	<u>Support</u> Addresses some the issues residents have had problems with.	32303
		<u>Object.</u> When the use characteristics are indivisible and there is an accepted need for both serviced apartments and housing which is fulfilling a need, the policy should be more flexible.	32471
<b>Section Nine: Providing the infrastructure to support development</b>			
CC-MM183	After paragraph 9.22	<u>Support</u> Although could be difficult to enforce.	32304
		<u>Support</u> Dangerous parking is a serious problem in the city	32451
<b>Appendix B: Proposals Schedule</b>			
CC-MM186	Site GB1: Land north of Worts' Causeway	<u>Object</u> There is no evidence base to justify an actual reduction in the density of development and should instead retain expected dwellings per hectare at 45. Request clarification regarding calculation.	32487
CC-MM188	Site GB2: Land south of Worts' Causeway	<u>Object</u> There is no evidence base to justify an actual reduction in the density of this larger (with addition of Newbury Farm) site. This does not make efficient use of the sustainable site.	32489
CC-MM191	Site R10: Mill Road Depot and Adjoining Properties	<u>Object</u> Fails to acknowledge and exclude the area of the garages, which is a constraint to redevelopment of this part of the site over the plan period.	32223
CC-MM193	Site R17, Mount Pleasant House, Mount Pleasant, Appendix B: Proposals Schedule	<u>Support</u> We support the site's deletion as a proposed housing allocation and insertion as a proposed student accommodation allocation.	32464
CC-MM196	Site R44: Betjeman House	<u>Support</u> Welcomes reference to the Botanic Gardens and conservation area as it provides greater protection to the historic environment	32260

Main Mod. Ref.	Local Plan policy / paragraph	Summary of issues raised in representations	Representation number(s)
CC-MM199	Site U1 Old Press/Mill Lane	<u>Object</u> Student accommodation needs have been assessed objectively and the plan should plan to meet such needs. There are already policies to protect heritage assets.	32228
CC-MM200	Appendix B: Proposals Schedule. Site U3; Grange Farm	<u>Support</u> We welcome the amendment to identify that the site contains features of biodiversity importance and development will only be permitted where it can be adequately demonstrated that proposals	32422
		<u>Support</u> The biodiversity of this site, adjacent to the Green Belt, needs to be protected.	32361
		<u>Object</u> This representation seeks the deletion of this criterion as no evidence has been produced to justify its inclusion in the policy.	32313
<b>Appendix C: Designation Schedule</b>			
CC-MM201	Designation Schedule	<u>Support</u> Provides greater clarity	32261
<b>Appendix F: Tall Buildings and the Skyline</b>			
CC-MM210	F.4	<u>Support</u> Provides greater protection to the historic environment in relation to proposals for tall buildings	32263
		<u>Object</u> to deletion of final sentence. Reinstate 'Given the relatively modest scale of buildings in Cambridge, this increased height has the potential to impact on both the immediate and wider skyline'	32476
CC-MM211	F.5	<u>Support</u> Provides greater protection to the historic environment in relation to proposals for tall buildings	32264
CC-MM212	F.8	<u>Object</u> The modifications to F.8 do not provide the necessary clarification as to what constitutes a "tall building": an additional modification is proposed.	32343
CC-MM213	F.10	<u>Support</u> Provides greater protection to the historic environment in relation to proposals for tall buildings	32265
CC-MM214	F.20 Criterion (d)	<u>Support</u> Provides greater protection to the historic environment in relation to proposals for tall buildings	32266 32362
		<u>Object</u> There is no evidence to justify the identification of Coton footpath and between Junctions 12 and 13 of the M11 as strategic viewpoints.	32474
CC-MM215	F.31	<u>Support</u> Provides greater protection to the historic core in relation to proposals	32267

Main Mod. Ref.	Local Plan policy / paragraph	Summary of issues raised in representations	Representation number(s)
		for tall buildings	32364
		<u>Support</u> suggest inclusion of 'within or impacting on the Historic Core' as this would add weight and reinforce.	32477
		<u>Object</u> Inconsistent with NPPF paragraphs 128, 132-134. Does not assess actual harm to a heritage asset.	32445
CC-MM216	Criterion 2: Historical Impact	<u>Support</u> Provides greater protection to the historic environment in relation to proposals for tall buildings	32268 32365
CC-MM217	F.34	<u>Support</u> Provides greater protection to the historic environment in relation to proposals for tall buildings	32269
		<u>Support</u> modification as supportive of the need to protect Cambridge's heritage and its skyline and as being in line with conservation and heritage and suburbs reports.	32480
CC-MM218	F.35	<u>Support</u> Provides greater protection to the historic environment and the setting of the City in relation to proposals for tall buildings	32270 32366
CC-MM219	F.41	<u>Support</u> Provides greater protection to the historic environment in relation to proposals for tall buildings	32271 32481
CC-MM220	Insert new Figure F.1	<u>Support</u> Provides greater protection to the historic environment in relation to proposals for tall buildings	32272
CC-MM221	Figure F.1 Existing Landmark Buildings	<u>Support</u> Provides greater protection to the historic environment in relation to proposals for tall buildings	32273
CC-MM222	Figure F.2 Topography and Strategic Viewpoints	<u>Support</u> Provides greater protection to viewpoints into and out of the city from the historic core and to the area to the west between the City and M11	32274 32363
		<u>Support</u> more work needs to be done on identifying key strategic viewpoints as part of a Cambridge Landscape Strategy and a Historic Environment Strategy, given all the rapid growth pressures on the city.	32482
		<u>Object</u> There is no evidence to justify the identification of Cotton footpath and between Junctions 12 and 13 of the M11 as strategic viewpoints.	32475
		<u>Object</u> Considers views are inadequate. Other key views further away from Cambridge are A603 from Orwell to Harlton junction and A14 near Swaffham	32199

Main Mod. Ref.	Local Plan policy / paragraph	Summary of issues raised in representations	Representation number(s)
		Heath Road and A603 at Wandlebury.	
<b>Appendix G: Local Heritage Assets Criteria and List</b>			
CC-MM223	G.3, insert new criterion after criterion (h)	<u>Support</u> Provides greater protection and more accurately reflects the NPPF	32275
CC-MM224	List of Local Heritage Assets	<u>Support</u> Provides greater clarity and updates the Local List	32276
<b>Appendix L</b>			
CC-MM236	Appendix L, Prior to and including Paragraph L.16	<u>Support</u> Provides clarification on suitable cycle parking and considers of cargo bikes and the potential difficulties of basement parking.	32306 32448
<b>Appendix M</b>			
CC-MM243	Appendix M: Monitoring and implementation	<u>Object</u> The proposed joint housing trajectory is not consistent with paragraph 47 of the NPPF, and it is not needed for soundness reasons.	32440 32469
<b>Appendix N</b>			
CC-MM244	Five Year Housing Land Supply Implementation	<u>Object</u> The use of the Liverpool method to calculate a housing land supply shortfall is not sound. Its not the preferred approach in national guidance and is inconsistent with the aim to boost significantly the supply of housing.	32430
		<u>Object</u> Support commitment to producing both individual and joint housing trajectories but seek clarification/ justification on 5 Year Housing Land Supply calculation.	32491
<b>Glossary</b>			
CC-MM247	Chalk Hills	<u>Support</u> Defines what is meant by Chalk Hills of Cambridge	32277
CC-MM249	Heritage Assets	<u>Support</u> Provides a more thorough definition of heritage assets	32278 32367
CC-MM250	Historic Core	<u>Support</u> Defines what is meant by the historic core	32279
<b>Policies Map</b>			
CC-MM255	Site GB2	<u>Support</u> to include Newbury Farm within the GB2 site	32486
		<u>Object</u> Additional further erosion of the Green Belt is unnecessary	32388

## B2. Sustainability Appraisal of Main Modifications - Summary of Representations related to the Cambridge Local Plan

Section	Paragraph	Summary of issues raised in representations	Representation number(s)
Non Tech Sum		Natural England is satisfied that the Sustainability Appraisal of Main Modification (December 2017) generally accords with the requirements of the Planning and Compulsory Purchase Act 2004 and the Strategic Environmental Assessment (SEA) Regulations. We agree that the modifications generally contribute positive effects in terms of all of the relevant sustainability objectives, including biodiversity. We have no further detailed comments to make.	32425
Appendix A.2		<u>Object</u> The sustainability appraisal process did not consider reasonable alternatives to the joint housing trajectory, which is a breach of the SEA Regulations.	32450

## B3. Cambridge Additional Modifications (not part of consultation but provided for information and completeness)

Additional Mod. Ref.	Local Plan policy / paragraph	Summary of issues raised in representations	Representation number(s)
<b>CHAPTER 7: Protecting and enhancing the character of Cambridge</b>			
SC-AM024	Paragraph 7.26	<u>Support</u> Historic England welcomes this proposed modification to reference the Cambridgeshire Historic Environment Record.	32280





## Appendix C: South Cambridgeshire Local Plan Modifications - Summary of Representations

GENERAL COMMENTS	
Organisation	Comment
Cambridgeshire Police Headquarters Crime Prevention Design Team (Estates)	I have read through the proposed Modifications on both local plans. I have no comments and this office is happy to support both sets of Modifications.
Environment Agency	Following our inspection of the above document I confirm that we have no objection, in principle, to the proposed Main Modifications.
Hertfordshire County Council	HCC Property (Development Services) on behalf of HCC services have no comments to make on the Consultation on the Cambridge Local Plan and South Cambridgeshire Local Plan Main Modifications.
National Grid	We have reviewed the consultation document and can confirm that National Grid has no comments to make in response to this consultation.

### South Cambridgeshire Main Modifications

Main Mod. Ref.	Local Plan policy / paragraph	Summary of issues raised in representations	Representation number(s)
<b>CHAPTER 2: SPATIAL STRATEGY</b>			
SC-MM003	New paragraph to paragraph 2.17 3 <sup>rd</sup> bullet point	<u>Object</u> Grammatically incorrect or incomplete sentence: "This work confirmed that the approach to the development strategy."	66271, 66671
SC-MM004	Policy S/4: Cambridge Green Belt	<u>Object</u> NPPF does not prevent the LPA from building in the Green Belt. As the recent white paper points out, much of the GB is unworthy of its designation – this addition is a red herring.	66306
SC-MM005	Paragraph 2.33	<u>Object</u> This text was entirely justified and should not be deleted.	66272
SC-MM008	Figure 2: Key Diagram for	<u>Object</u> to inclusion of proposed extension to Addenbrooke's Biomedical	66571

Main Mod. Ref.	Local Plan policy / paragraph	Summary of issues raised in representations	Representation number(s)
	Cambridge and South Cambridgeshire	Campus. [Rationale provided in representor's Rep 66587 to SC-MM184 – impacts on ecology of Nine Wells, future pressure for expansion, access issues & future rail widening proposals.]	
SC-MM011	Policy S/7: Development Frameworks	<u>Support</u> Policy amendment allows communities to agree on small scale policy matters within the Neighbourhood Planning process.	66294
SC-MM012	After Paragraph 2.51	<u>Support</u> Brilliant idea but most villages are constrained by tight green belts.	66308
		<u>Support</u> the change 'with evidence of community support' for changes to basic principles.	66295
		<u>Support</u> "Infill only" villages should have the opportunity to consider wider development, if residents wish.	66436, 66286
		<u>Support</u> Welcome option for Parish Councils to allocate sites outside the village's development framework subject to community support.	66465
		<u>Support</u> but would like it to encompass development for housing and employment to enable Neighbourhood Plans to permit employment outside village frameworks.	66282
		<u>Support</u> A helpful statement about Neighbourhood Plans	66672
		<u>Object</u> Such plans must be in general conformity with the strategic policies of the Local Plan. Local Plans allocate sites having regard to national planning policy in respect of robust site assessment criteria. Proposed sites in Neighbourhood Plans that are outside of the development frameworks should follow such assessment criteria in terms of their location and relationship with existing framework boundaries. The new text in Paragraph 2.51a should be amended to reflect these requirements.	67032, 67041
SC-MM014	After paragraph 2.54	<u>Support</u> deletion from Pampisford. Corrects anomaly. Strengthens objective for village frameworks and reinforces principle of plan led system. Resolution to grant permission for comprehensive development of the Sawston Trade Park and surrounding vacant land for a new business park.	66854
		<u>Object</u> No justification for this change. Historic business area, part of Pampisford not Sawston. Other "infill only" villages also have business areas in them.	66409, 66285, 66284
		<u>Object:</u> Local Plan sound whether or not modification is approved. Site has no	66766

Main Mod. Ref.	Local Plan policy / paragraph	Summary of issues raised in representations	Representation number(s)
		relationship to other employment areas in Sawston, mainly located at north eastern edge of village. Majority of site has been recognised as suitable for employment purposes for 30+ years, even though Pampisford has been 'infill only' village. Planning applications for employment have not been refused on grounds that Pampisford is 'infill'. Changing from Pampisford to being in Sawston framework makes no practical planning difference, and unnecessary.	
		<u>Object</u> : Pampisford Neighbourhood Plan area designation covers the whole parish.	66812
SC-MM016	Policy S/12: Phasing, Delivery and Monitoring	<u>Object</u> to the Liverpool Methodology – used to avoid house building by rolling over deficiencies.	66309
		<u>Object</u> to the Liverpool Methodology. Trajectory too optimistic. Figures show persistent under delivery due to lack of variety of sites.	66559
		<u>Object</u> With commencement of Cambourne West, no requirement to start Bourn Airfield until 2022.	66292
		<u>Object</u> Support 20% buffer but object to Liverpool approach. Merely results in delays to delivery. Does not meet requirement to boost supply. South Cambs is not constrained and has sites that could deliver in short term. Council are not justified in this approach.	66592
		<u>Object</u> to Liverpool method. NPPG states that shortfall in delivery shall be provided for within first 5 years of the plan period. Work closely with developers to unlock sites.	66601
		<u>Object</u> : 'Liverpool' method is not the preferred approach identified in national guidance and is inconsistent with the aim to boost significantly the supply of housing, the 'Sedgefield' method has been preferred at planning appeals in South Cambridgeshire, the 'Sedgefield' method is currently applied by neighbouring authorities, and the 'Liverpool' method is unnecessary if assumptions about housing delivery at the existing and proposed new settlements are correct. Support the use of a 20% buffer	66908, 66933
		<u>Object</u> : Objects to the unjustified adoption (without evidence or clarification) of the Liverpool methodology now proposed by both Councils.	66969

Main Mod. Ref.	Local Plan policy / paragraph	Summary of issues raised in representations	Representation number(s)
		<p>There are clear differences between the supply in Appendix aa and the previous trajectory. The appendix or Cambridge AMR does not provide a detailed trajectory, therefore it is not possible to comment on changes to delivery rates. To comply with national policy an updated version of the trajectory should be provided.</p> <p>Supports the approach of a 20% buffer.</p>	
		<p><u>Object:</u> The Liverpool Method is not supported, Sedgefield method should be used. Record in under supply is neither a short-term event nor due to any specific market or physical constraint, which could warrant use of the Liverpool Method; in Cambridge City Council, the 5YHLS targets have regularly been exceeded in recent years. Urgency in dealing with this issue is heightened by the commencement of a Joint Local Plan, which will likely increase requirements. Development strategy is flawed as insufficient land has been allocated. The 20% buffer should apply.</p>	67021, 67048
SC-MM018	Paragraph 2.63	<p><u>Support</u> Liverpool method. Allows asymmetric delivery over time. Welcome 20% buffer in light of historic under-delivery and vibrancy of economy. Urge caution in setting over-ambitious future housing needs.</p>	66444
		<p><u>Object</u> to the Liverpool Methodology – used to avoid house building by rolling over deficiencies.</p>	66310
		<p><u>Object:</u> Local problems with deliverability have, and will, continue to hamper the need to significantly boost housing supply. The Sedgefield method should be used because of the consistent under delivery of housing sites, the unwillingness of SCDC to accept problems in the past and clear presumption in favour of using Sedgefield within the PPG and NPPF.</p>	66656
		<p><u>Object:</u> 'Liverpool' method is not the preferred approach identified in national guidance and is inconsistent with the aim to boost significantly the supply of housing, the 'Sedgefield' method has been preferred at planning appeals in South Cambridgeshire, the 'Sedgefield' method is currently applied by</p>	66909, 66934

Main Mod. Ref.	Local Plan policy / paragraph	Summary of issues raised in representations	Representation number(s)
		neighbouring authorities, and the 'Liverpool' method is unnecessary if assumptions about housing delivery at the existing and proposed new settlements are correct.  Support the use of a 20% buffer because there is evidence from monitoring data of persistent under delivery.	
		<u>Object:</u> Sedgefield method should be used. Reliance on new settlements and large strategic sites that are planned to come forward later in the plan period, where no alternatives exist, should not be a reason in itself to proceed with the Liverpool Method. Does not acknowledge the significant demand for new housing in the Greater Cambridge area. To defer delivery until later in the Plan period will only worsen the affordability situation. SCDC must plan for the full housing backlog in the next five years and demonstrate how it will meet the NPPF objectives and policy.	67022, 67047
SC-MM019	Paragraph 2.64	<u>Support</u> Note SCDC has had a 5-year land supply from at least November 2017 without allocating new houses to Cottenham.	66447
		<u>Support</u> the methodology proposed for establishing housing land supply.	66673
		<u>Object:</u> Disagree with the assumptions about start dates and delivery rates at some of the larger sites included within the housing trajectory. The housing land supply within South Cambridgeshire is significantly less than currently predicted. Inability to demonstrate a five year housing land supply is a soundness failure. In these circumstances, additional sites should be identified which are deliverable and where delivery can commence within the five year period.	66903, 66930, 67052
		<u>Object:</u> Modification claims that both SCDC and Cambridge City Council can individually and jointly demonstrate a 5YHLS. It is unreasonable for the Council to express strong confidence in the delivery of new settlements whilst promoting the Liverpool Method at the same time. The Sedgefield Method is the most appropriate approach as it accords with the NPPF and PPG.	67026, 67046
SC-MM020	Paragraph 2.65	<u>Support</u> Welcome that windfall sites contribute to the supply of housing and the use of historic data to assess likely level of future contribution.	66450

Main Mod. Ref.	Local Plan policy / paragraph	Summary of issues raised in representations	Representation number(s)
SC-MM024	After Paragraph 2.70	<u>Support</u> City Deal allowance should be in addition to the total OAN, to ensure that it leads to a genuine net improvement to affordability.	66593
		<u>Object</u> Make clear the City Deal 1,000 is an additional obligation and not one that applies only when other obligations have been met.	66311
		<u>Object</u> Impacts significantly on sites not allocated outside the defined rural settlement boundary. All sites should contribute to the 1,000 extra rural affordable homes.	66293
SC-MM025	Figure 4: Monitoring Indicators	<u>Support</u> Contributions from Neighbourhood Plans need to be taken into account in local housing needs. City Deal & combined authority working (across boundaries) could impact on South Cambs.	66296
		<u>Support:</u> Important that the Local Plan includes clear information about its approach to calculating housing land supply, and gives projections regarding Five Year Housing Land Supply figures. The new Appendix Aa does exactly this. (also highlights two typographical errors)	66721, 66752
		<u>Support:</u> Natural England generally welcomes the proposed local plan monitoring indicators including indicators to monitor impacts to the natural environment and biodiversity.	66895
		<u>Object</u> to the proposed joint housing trajectory and its inclusion into the monitoring indicators. The proposed joint housing trajectory is not consistent with national guidance, and it is not needed for soundness reasons. Consequences of the joint housing trajectory have not been fully understood by either Council, or how it would work in practice. Alternatives to it were not considered in the Sustainability appraisal.  Different actions are proposed for the housing monitoring indicators for Policy 3 of the Cambridge Local Plan and Indicator M1 in Appendix E for the South Cambridgeshire Local Plan, which adds to the uncertainty about the implementation of the joint housing trajectory by each Council.	66905, 66931, 67054
		<u>Object:</u> Indicator M1 (Policy S/5) sets a target to demonstrate a five year supply of housing land (plus relevant buffer) jointly with Cambridge City Council. We	67028, 67045

Main Mod. Ref.	Local Plan policy / paragraph	Summary of issues raised in representations	Representation number(s)
		disagree with this approach, which would give SCDC a 5YHLS based on Cambridge City's ability to meet its targets.	
SC-MM026	After proposed paragraph 2.70a	<u>Support</u> : Early review of the spatial strategy is welcome given the rapidly changing context across the sub-region and within the NIC corridor.	66856
		<u>Object</u> Huge amount of time and work already gone into this plan. Should stand until the original target date of 2031. Uncertainty and costs are not in the public interest.	66453, 66273
		<u>Object</u> Add: 'd. the accommodation needs of Gypsies and Travellers, both those who come within the definition at Annex 1 to Planning policy for traveller sites, and those who do not meet the definition.'	66440, 66915
		<u>Object</u> Support principle but policy needs to be clear, easily understandable, and effective setting achievable targets for completion. Insufficient certainty regarding timescales. Too ambiguous and non-comital. Concerns regarding the policy referring to review "commencing" as this could commence and stall or be delayed. Further detail is needed.	66594
		<u>Object</u> Needs to refer to economic needs of Cambridge and South Cambridgeshire or employment/job creation. Imperative reference is made in the policy to the need for an updated assessment of employment floor space and distribution for specific employment uses and an assessment of the full range of employment requirements in the Local Plan review.	66666
		<u>Object</u> 2014 Local Plan should form strategic framework for review Local Plan	66572
		<u>Object</u> : The Cambridge and South Cambridgeshire review may lead to a new joint Local Plan, as envisaged in the proposed policy, or it is possible that a new policy regime may emerge. Given this context it may be prudent to slightly amend the opening paragraph of Policy S13 to assert the commitment to the review of the spatial strategy and to indicate that this is likely to be through preparation of a new joint Local Plan.	66858
		<u>Object</u> : The timescales must be amended to ensure the Council's stated commitment for the review is consistent with it being "early" and to ensure the soundness of the plan. Review should commence immediately on adoption of	66945



Main Mod. Ref.	Local Plan policy / paragraph	Summary of issues raised in representations	Representation number(s)
		<p>the local plans, with submission for examination no later than Spring 2021.</p> <p>Policy S/13 should be amended to specifically refer to a review of wider effects of City Deal proposals on spatial and transport planning, to ensure the commitment the Councils made via the Greater Cambridge City Deal Document(7) is met.</p> <p>Insofar as the Inspectors may conclude the Plan can proceed- without further Green Belt evidence - it can only be on the basis that the early Plan review is based on a fresh Green Belt review that looks again at both the contribution of land and the balance of retaining it within Green Belt against other sustainable development objectives.</p>	
<b>CHAPTER 3: STRATEGIC SITES</b>			
SC-MM030	Policy SS/2 Land between Huntingdon Road and Histon Road (part 6)	<u>Object</u> Modification weakens the policy by removing the car club requirement making it optional. Car clubs are needed to reduce vehicle movements on local roads which are already congested and polluted in peak periods.	66864, 66609
SC-MM031	Policy SS/2 Land between Huntingdon Road and Histon Road (Part 10)	<u>Object</u> Modification weakens the policy by removing the requirement for bus segregation. Bus services will be less reliable as a result and so less used increasing car use. Footpaths and cycle paths should not be shared.	66865, 66620
SC-MM036	Paragraph 3.14	<u>Object</u> If new routes are to be delivered into the countryside for NMU's then equestrians will need use of the A14 overbridge as well.	66278
SC-MM036	Paragraph 3.14	<u>Support</u> I support walking and cycling use of the A14 overbridge.	66692
SC-MM044	Policy SS/4 Cambridge Northern Fringe East and land surrounding the proposed Cambridge Science Park Station (Part 3)	<u>Support</u> Anglian Water has been working with Cambridge City and South Cambridgeshire Councils to explore the relocation of Cambridge WRC and will continue to do so as they consider their options for the future through the AAP.	66841
SC-MM045	Policy SS/4 Cambridge	<u>Support</u> Proposed modifications to protect local biodiversity sites including	66871, 66843

Main Mod. Ref.	Local Plan policy / paragraph	Summary of issues raised in representations	Representation number(s)
	Northern Fringe East and land surrounding the proposed Cambridge Science Park Station (Part 4)	Bramblefields LNR and supporting habitat are welcomed. Support updated terminology from WWTW to Cambridge Water Recycling Centre. Also support that development should not prejudice redevelopment opportunities in the wider area.	
SC-MM047	After paragraph 3.29	<u>Object</u> proposed approach is overly restrictive and contrary to the NPPF which seeks to deliver sustainable development. Could sterilise one of the most sustainable brownfield sites in Cambridge for years. Within development framework and allocated. AAP already long delayed.	66867
SC-MM047	After paragraph 3.29	<u>Object</u> No planning applications should be allowed before the AAP is adopted in order to avoid uncoordinated piecemeal development. The AAP boundary should include Cambridge Science Park, Cambridge Business Park, St John's Innovation Centre as well as Cambridge Northern Fringe East to coordinate the development of the entire area.	66573
SC-MM048	Paragraph 3.30	<u>Object</u> Must include a commitment to explore all the options for the re-location of both the Waste Water Treatment Plant and the aggregates rail head. The areas full potential cannot be realised unless these obstacles are removed.	66574
SC-MM050	Paragraph 3.31	<u>Support</u> Anglian Water has been working closely with Cambridge and South Cambridgeshire councils to explore the relocation of Cambridge WRC to enable re-development of the wider area. Welcome reference to exploring the feasibility of the relocation of Cambridge WRC as part of the AAP.	66844
SC-MM053	Figure 6	<u>Object</u> to the allocation of the new employment site at the Cambridge Biomedical Campus.	66575
SC-MM056	Policy SS/5 Waterbeach New Town (Part 1)	<u>Support</u> Welcome additional text confirming that a Supplementary Planning Document will be prepared for the New Town development.	66872
		<u>Object</u> Insertion of word 'approximately' reduces clarity and its meaning is unclear. The actual number of homes will be determined through an SPD. But doubt this will adequately control the development or meet aspirations concerning housing numbers, spatial layout and delivery. Unreasonable to rely on SPD as driver for the Local Plan.	67133, 67109

Main Mod. Ref.	Local Plan policy / paragraph	Summary of issues raised in representations	Representation number(s)
		<u>Object</u> The insertion of "approximately" is not sufficient to overcome the unsound constraint placed by the specified upper limit of 9,000 dwellings.	66942
		<u>Object</u> Capacity should not be expressed as an approximate range of 8-9,000 and a 'final' housing number cannot be determined in SPD.  Sentence 1 of Paragraph 1 should refer to: "approximately 10,000 dwellings". Sentences 2 and 3 of Paragraph 1 should be amended to read: "A Supplementary Planning Document (SPD) will be prepared for the new town as addressed at subsection 17 of the policy. The potential capacity of the site, including the number of dwellings, will be tested through the SPD, having regard to: a. [as before]"	66852
SC-MM057	Policy SS/5 Waterbeach New Town (Part 2)	<u>Object</u> to deletion of Green Belt separation between the village and new town. Reference to Green Belt separation should be retained.	67134, 67111
SC-MM058	Policy SS/5 Waterbeach New Town (Part 3)	<u>Support</u> Provides an appropriate level of connectivity to the benefit of the new town and existing village.	66951
		<u>Object</u> original wording should be retained as wish to see a degree of separation between the village and new town and to discourage journeys by car by ensuring it is more convenient to cycle of walk between the two.	67135, 67112
SC-MM059	Policy SS/5 Waterbeach New Town (Part 4)	<u>Support</u> Waterbeach, as a development location, has the potential to achieve a high modal share of travel by means other than the car. The relocation of the station is the most important component of the strategy to achieve a sustainable modal shift, as journeys by train provide the principal alternative to travel by private car. It is vital to ensure the station is planned and can be delivered from the outset, with the necessary commitment from all promoters and stakeholders.	66961
		<u>Object</u> Moving the railway station is completely detrimental to the existing community. Reference implies that a decision has already been taken, highly contentious locally so a presumption to this effect should be avoided.	66407, 67113
SC-MM061	Policy SS/5 Waterbeach	<u>Support</u> Historic England welcomes reference to the design of northern edge	66490

Main Mod. Ref.	Local Plan policy / paragraph	Summary of issues raised in representations	Representation number(s)
	New Town (criterion c)	and its relationship to Denny Abbey, providing greater protection to the historic environment.	
SC-MM063	Policy SS/5 Waterbeach New Town (criterion e)	<u>Support</u> Welcome confirmation that an SPD will provide further guidance and detail to policy SS/5 regarding the spatial framework, formal open space and phasing.	66874
		<u>Object</u> Could lead to open space being moved off site to facilitate over development.  Reinstate deleted words 'and formal open spaces uses' so it reads 'All the built development and formal open space uses will be provided within the Major development site....'  Change wording to require that all informal space is incorporated within the site.  Delete second sentence 'Land outside the...informal open space' entirely. Seen as a way of increasing housing numbers within site by off-siting amenity and informal open space detracting from the quality of the residential environment.  Minimises loss of agricultural land.	67136, 67114
		<u>Object</u> Policy SS/5 (Mod Ref. SC-MM063) should be further modified to include provision for 'formal' as well as 'informal' open space to be provided outside the Major Development Site.	66965
SC-MM065	Policy SS/5 Waterbeach New Town (Criteria m-r)	<u>Support</u> Historic England welcomes reference to the WWI structures and raised causeway, providing greater protection to the historic environment.	66491
		<u>Object</u> Reference to odour in bullet point 'e' of Policy SS/5 should be deleted as mitigation cannot be achieved in the way suggested.	66860
SC-MM067	Policy SS/5 Waterbeach New Town (Criteria s-w)	<u>Support</u> Welcome the inclusion of additional transport policy requirements in respect of the new town which includes reference to providing additional capacity at the junction with the A14 (junction 33).	67002
		<u>Support</u> The importance of a comprehensive approach that provides connectivity	66968

Main Mod. Ref.	Local Plan policy / paragraph	Summary of issues raised in representations	Representation number(s)
		to key locations and achieves a modal shift from car based travel is endorsed.	
		<u>Support</u> The modification is correct that measures to promote cycling and walking should be 'from the start of the development' for good habits to emerge. Instead of the word 'promote' I would use the word 'enable', however, since that is stronger.	66697
		<u>Object</u> The reference to a relocated railway station implies that a decision has already been taken. This is highly contentious issue locally so a presumption to this effect should be avoided.	67116
SC-MM072	Policy SS/5 Waterbeach New Town (Criteria mm-nn)	<u>Support</u> This amendment sets some requirements for the phasing of the Waterbeach site. It notes that 'suitable mechanisms to deliver the infrastructure in a timely and efficient way' must be established. This approach will need to consider wider objectives and strategies for improving the A14, such as may be relevant later in the plan period when this site is expected to come forward. Development should be phased so as to ensure that junction improvements required under SS/5 are delivered in a timely manner, recognising the strategic importance of the A14.	67007
		<u>Support</u> The SPD & delivery of early phases on both DIO & RLW land in parallel are vital to meet the Policy requirements and secure comprehensive development	66970
		<u>Object</u> In c) add after infrastructure: and site access. To ensure minimum disruption in Waterbeach village.	67137
		<u>Object</u> The amended wording in 16a requires forthcoming development to be compliant with a spatial framework diagram from a Supplementary Planning Document (SPD) which is not yet public and that the Parish Council is concerned will include elements of design, layout, phasing and implementation that it continues to object to. Moreover the Parish Council has not been consulted on the draft spatial framework diagram.  It is considered unreasonable to make reference to compliance with a document that is not yet available for public consultation.	67118

Main Mod. Ref.	Local Plan policy / paragraph	Summary of issues raised in representations	Representation number(s)
SC-MM073	Policy SS/5 Waterbeach New Town (new part)	<p><u>Support</u> The SPD will need to ensure infrastructure delivery is phased to support improvements to the A14.</p> <p>The amendment is necessary for soundness and to ensure the plan is effective.</p> <p>Welcome confirmation of the SPD to provide further guidance and detail on the implementation of Policy SS/5 including in regard to the 'spatial framework diagram, any formal open space to be provided outside of the Major Development Area Site and how the development is to be phased including the delivery of key infrastructure.'</p>	67008, 66972, 66876
		<p><u>Object</u> to the proposed modification 17d and request that section 17d is deleted (for consistency with other comments made). [Rep 67136 seeks amendments to include formal and informal open space within the MDS]</p>	67139, 67119
SC-MM074	Paragraph 3.35	<p><u>Support</u> RLW Estates has a commitment to consult and engage with local stakeholders through the evolution of their proposals for Waterbeach New Town, and welcomes the full involvement of the local community and stakeholders in the preparation of the SPD.</p>	66975
		<p><u>Object</u> The local community is not yet being engaged in the preparation of the SPD. SPD preparation must involve the local community.</p>	67120
SC-MM075	Paragraph 3.36	<p><u>Support</u> Historic England welcomes reference to the Farmland Museum, Historic England's Guidance and clarification re formal open space outside the Major Development Site, providing greater protection to the historic environment and clarity to the policy.</p>	66492
		<p><u>Support</u> Necessary to ensure the Plan is effective and uses land efficiently as required by the NPPF.</p>	66977
		<p><u>Support</u> Welcome confirmation that an SPD will provide further guidance and detail to policy SS/5 regarding the spatial framework, formal open space and phasing.</p>	66877
		<p><u>Object</u> The final sentence should be deleted (from 'There may be scope...through the SPD'). To be consistent with other representations made.</p>	67140, 67122

Main Mod. Ref.	Local Plan policy / paragraph	Summary of issues raised in representations	Representation number(s)
		They should not offset the open space within the new town through the loss of further agricultural land.	
SC-MM076	Paragraph 3.37	<u>Object</u> The proposed modification should be deleted and the original wording be retained with the exception of (in the vicinity of Bannold Rd) which should be replaced with (North of the built Barracks area) and the ref to SPD rather than AAP.	67141, 67123
SC-MM077	Policy SS/6 New Village at Bourn Airfield	<u>Support</u> creation of SPD being prepared for the new village	66878, 66741
SC-MM078	Policy SS/6 New Village at Bourn Airfield (Part 5)	<u>Support</u> additional requirement to provide formal and informal open space and strategic landscaping	66879
SC-MM080	Policy SS/6 New Village at Bourn Airfield (Criterion a)	<u>Object</u> Wording is too vague. What does "appropriate relationship with Cambourne and Highfields Caldecote" mean? Parish Council and community should be involved in determining this. Should retain their separate identity. This is evidence that the separation between the proposed development, Cambourne and Highfields is insufficient.	67086, 67064, 67014, 66952, 66819, 66636, 66635, 66627, 66545, 66538, 66526
		<u>Object</u> "Appropriate relationship" is that the settlements retain their separate rural identity and separation distance – at least 500m.	66478
SC-MM081	Policy SS/6 New Village at Bourn Airfield (Criteria b to h)	<u>Object</u> Replacement of reference to Thyssen-Krupp site with promised consultation with 'stakeholders' over quantum type and mix of appropriate employment substitutes something indefinite for what was definite. Without a substantial designated site for employment dormitory residential development will result.	66289
		<u>Object</u> to removal of employment for housing.	66539
		<u>Object</u> To be sustainable, a larger area of the site needs to be turned over to employment rather than residential.	66482
		<u>Object</u> Cambourne proved employment opportunities will be limited. Likely lead to dormitory village with residents travelling into Cambridge.	66431
		<u>Object</u> Retain reference to ThyssenKrupp site as an employment site to provide	67087, 67065,

Main Mod. Ref.	Local Plan policy / paragraph	Summary of issues raised in representations	Representation number(s)
		local employment and prevent out commuting and traffic impacts. The site has been recently acquired as a strategic commercial employment site for industrial, technology and R&D sectors	67015, 66953, 66823, 66628, 66520
		<u>Object</u> Policy SS/6 should be flexibly worded to enable the former ThyssenKrupp site to come forward independently of the new village and for a range of employment uses.	67117
SC-MM082	Policy SS/6 New Village at Bourn Airfield (Criteria i to l)	<u>Support</u> additional text to require strategic landscaping within and beyond the site including a buffer to the eastern boundary incorporating a continuous woodland belt.	66880
		<u>Object</u> Wording is too vague. What does “substantial and continuous woodland belt” mean? More detail is required. Must remain in perpetuity.	67089, 67066, 67017, 66954, 66824, 66637, 66630, 66553, 66546
		<u>Object</u> Does more to ensure coalescence of the villages west of Cambridge. No effective separation.	66433
		<u>Object</u> Woodland belt described as ‘substantial’ but from map appears only to be 20m. Misleading description.	66479
		<u>Object</u> Not clear what plans are in place to ensure that “substantial and continuous woodland belt” will be created and maintained for the long term.	67106
		<u>Object</u> Fails to address need for strategic landscaping and separation between Highfields Caldecote and the north end of the development.	66639
SC-MM084	Policy SS/6 New Village at Bourn Airfield (Criteria r to t)	<u>Support</u> aim of ensuring no direct vehicular access on to the Broadway for private motor vehicular traffic travelling southwards	66738
		<u>Support</u> assertion that measures to promote cycling and walking should be 'from the start of the development'.	66698
		<u>Object</u> Since 1992 there has been an understanding that increased traffic on to the Broadway would harm Bourn village.  1996 SCDC Planning Committee voted against access from Cambourne.	67094, 67083, 67073, 67058, 66914, 66906, 66869, 66681,



Main Mod. Ref.	Local Plan policy / paragraph	Summary of issues raised in representations	Representation number(s)
		<p>Recently Cambourne and Bourn Parish Councils agreed to allow emergency vehicle access only provided it never allowed full vehicle access.</p> <p>Ban on cars using the Broadway must be enforced to protect rural character of the Broadway and quality of life in Bourn and Knapwell.</p> <p>Traffic survey demonstrates traffic has increased as it is a rat run to avoid M11/A14. Impacts on the village.</p> <p>Modification specifies northbound only access but this is not enforceable.</p>	<p>66653, 66648, 66645, 66623, 66514, 66475, 66473, 66411, 66405, 66337, 66324</p>
		<p><u>Object</u> Allowing vehicular access to Broadway is wrong.</p> <p>It was prevented for the Cambourne development.</p> <p>Northbound traffic only restriction will be impossible to police.</p> <p>Will have an enormously detrimental effect on the Broadway and traffic through Bourn and Knapwell. Damage to village character and life.</p> <p>Will create safety problems, including for cyclists and pedestrians in the village and on the Broadway itself; visibility northward is poor due to the bridge over the A428.</p>	<p>67194, 67147, 67103, 67090, 67079, 67067, 67060, 67050, 66955, 66912, 66881, 66735, 66641, 66632, 66608, 66605, 66599, 66590, 66550, 66547, 66540, 66533, 66626, 66529, 66521, 66517, 66510, 66506, 66484, 66480, 66467, 66438, 66434, 66432, 66424, 66421, 66417, 66402,</p>

Main Mod. Ref.	Local Plan policy / paragraph	Summary of issues raised in representations	Representation number(s)
			66401, 66395, 66392, 66385, 66383, 66381, 66378, 66375, 66370, 66367, 66363, 66360, 66344, 66340, 66331, 66326, 66321, 66317, 66303
		<p><u>Object</u> Enforcement of Northbound traffic only restriction is unproven. Northbound access option to The Broadway can only work in parallel with changes to southbound access to the M11 from the A428 at Girton. Consider the wider impact of transport changes currently in the design phase before committing to two northbound access points. Need to ensure direct access for Bourn new settlement traffic to the A428 dual carriageway, avoiding the Childerley roundabout and the old St Neots Road.</p>	66847
		<p><u>Object</u> Removal of requirement to 'potentially incorporate' a Park &amp; Ride (P&amp;R) facility within the Bourn Major Development Site conflicts with the fact that P&amp;R was a key factor in the appraisal of Bourn Airfield and its selection as suitable for a Major Development Site. To remedy this, either the SA needs to be updated to reflect the change, or P&amp;R provision must be made in the plan north of Cambourne.</p> <p>Northbound only access to the Broadway will exit east of the site, increasing traffic through Highfields and Caldecote.</p>	67084
SC-MM086	Policy SS/6 New Village at Bourn Airfield (Criteria cc to ee)	<u>Support</u> the proposed amendment referring to the preparation of a foul drainage strategy to explore and identify suitable arrangements for foul drainage and disposal for the Bourn Airfield site.	66845
SC-MM089	Policy SS/6 New Village	<u>Object</u> Plan does not state how infrastructure to support development will be	66435

Main Mod. Ref.	Local Plan policy / paragraph	Summary of issues raised in representations	Representation number(s)
	at Bourn Airfield (Criteria ii to jj)	achieved. Site not big enough to accommodate infrastructure and houses.	
		<u>Object</u> Criterion 14 should explicitly state that it excludes the former ThyssenKrupp site.	67125
		<u>Object</u> The requirement for the delivery of the village to include essential services and facilities includes the need for a secondary school, but evidence shows that the development at Bourn is not large enough to support one.	67088
SC-MM091	Paragraph 3.41	<p><u>Object</u> No justification for a modification that seeks to bring forward the development of Bourn Airfield earlier in the plan period. Should not bring forward Bourn Airfield until public transport infrastructure solutions are delivered. Their delivery will be delayed:</p> <ul style="list-style-type: none"> <li>• Cambourne to Cambridge busway has stalled</li> <li>• No solution proposed for Girton interchange</li> <li>• No consensus on Park &amp; Ride on or near A428</li> </ul> <p>Significant developments ongoing which have created a significant increase in traffic.</p> <p>Must increase public transport and cycle infrastructure first to avoid adding to congestion.</p> <p>Building out the new village early in the development plan will only lead to detrimental effect on surrounding villages.</p> <p>No houses should be built until a public transport system, Girton Interchange and Park &amp; Ride are completed.</p>	67195, 67095, 67091, 67081, 67078, 67077, 67074, 67068, 67061, 67056, 67051, 66956, 66916, 66907, 66884, 66870, 66838, 66685, 66654, 66649, 66646, 66642, 66640, 66638, 66624, 66607, 66604, 66600, 66591, 66554, 66549, 66541, 66534, 66531, 66522, 66516, 66515, 66511, 66507, 66485, 66481, 66476, 66470, 66468, 66439, 66425, 66422, 66419,

Main Mod. Ref.	Local Plan policy / paragraph	Summary of issues raised in representations	Representation number(s)
			66415, 66412, 66406, 66404, 66403, 66396, 66386, 66384, 66382, 66379, 66376, 66371, 66368, 66361, 66345, 66341, 66338, 66332, 66328, 66327, 66322, 66316, 66304
		<u>Object</u> A period of non-development is needed to allow the area to recover and adapt to the needs of surrounding villages.	67072
		<u>Object</u> Construction of the development should be deferred 'in order to create a comprehensive policy framework, and to allow the nature of the new village to be established with the local communities and stakeholders'.	66827
		<u>Object</u> There is no need for bringing Bourn Airfield earlier in the plan period: delivery of other strategic sites including those extra to 5-year housing land supply sites meets supply.	66739
SC-MM095	Policy SS/8 Cambourne West	<u>Support</u> Anglian Water support the proposed amendment to the Local Plan to refer to the preparation of a foul drainage strategy to explore and identify suitable arrangements for foul drainage and disposal for the Cambourne West site.	66846
SC-MM096	Paragraph 3.50	<u>Object</u> Wording does not reflect position at the time the plan will be adopted. Amend to read: "Caxton village (the majority of the site was until the May 2018 boundary changes largely within Caxton Parish)."	66556
<b>CHAPTER 4: CLIMATE CHANGE</b>			
SC-MM102	After Paragraph 4.11	<u>Object</u> : Inserts a new requirement into policy CC/1 for BREEAM communities (BC) assessment on developments over 1000 dwellings or 5,000 sqm. Object	66989

Main Mod. Ref.	Local Plan policy / paragraph	Summary of issues raised in representations	Representation number(s)
		because not been subject to viability testing, additional burden on new developments, was designed to assess mixed-use development able to secure credits in a cost effective manner. Should be deleted.	
SC-MM105	Policy CC/2: Renewable and Low Carbon Energy Generation	<u>Support</u> the modification but there is a typo. As amended the words seem to read '...or it the energy generated would ...'	66674
SC-MM115	Policy CC/9 Managing Flood Risk	<u>Object</u> Limiting discharge of surface water to "natural" greenfield rates or lower is not enough to safeguard areas like Cottenham that rely on IDB pumping stations to keep "lowland" water levels at acceptable levels.	66455
SC-MM116	Paragraph 4.36	<u>Support</u> Welcome preparation of a Flood & Water strategy SPD but question whether an SPD is strong enough to counter the real risk in some areas.	66457
SC-MM117	Paragraph 4.34	<u>Support</u> Welcome inclusion of Internal Drainage Boards as statutory consultees.	66459
<b>CHAPTER 5: DELIVERING HIGH QUALITY PLACES</b>			
SC-MM119	Policy HQ/1: Design Principles	<u>Support</u> Historic England welcomes reference to 'setting'. Provides greater protection to the historic environment in line with NPPF.	66493
SC-MM121	Policy HQ/1: Design Principles	<u>Support</u> Historic England welcomes reference to the importance of appropriate scale. Provides helpful clarification to the policy.	66494
SC-MM124	Paragraph 5.6	<u>Support</u> Historic England welcomes reference to the historic environment. Provides greater protection to the historic environment in line with NPPF.	66495
<b>CHAPTER 6: PROTECTING AND ENHANCING THE NATURAL AND HISTORIC ENVIRONMENT</b>			
SC-M131	Paragraph 6.16	<u>Support</u> Natural England welcomes additional text to reference contributing to wider ecological networks	66883
SC-MM132	Policy NH/5: Sites of Biodiversity or Geological Importance	<u>Support</u> This is better aligned with NPPF requirements relating to the protection of statutorily designated sites.	66885
		<u>Object</u> We do not see why the protection of sites of biodiversity or geological importance should be diluted in this way, and ask that the original text is reinstated.	66577
SC-MM133	Policy NH/5: Sites of Biodiversity or Geological Importance	<u>Support</u> this is better aligned with NPPF requirements relating to the protection of statutorily designated sites.	66886

Main Mod. Ref.	Local Plan policy / paragraph	Summary of issues raised in representations	Representation number(s)
SC-MM134	Policy NH/5: Sites of Biodiversity or Geological Importance	<u>Support</u> Welcome the amended policy wording regarding compensatory measures.	66887
		<u>Object</u> Idea that biodiversity features or habitats can be re-created on or off-site is simply farcical. They cannot be simply re-created as part of some form of compensatory mechanism for the damage done by development.	66587
SC-MM136	Paragraph 6.33	<u>Object</u> : The commitment to prepare a listing of known veteran trees as part of the Biodiversity SPD was a positive step in strengthening the protection of ancient woodland and veteran trees which are under increasing pressure across the county. The inserted text, although a welcome addition to Para 6.33, does not compensate as it refers only to the survey of trees on application sites. The original text should be reinstated.	66578
SC-MM137	Policy NH/8: Mitigating the Impact of Development In and Adjoining the Green Belt	<u>Object</u> to the deletion of reference in Policy NH/8 Para 1 to "proposals outside but in the vicinity of the Green Belt". Inappropriate development on the edge of the Green Belt can have a deleterious effect on the purposes for including adjacent land within the Green Belt. This clause should be retained. Similarly, the original text should be reinstated in Para 3.	66580
SC-MM138	Paragraph 6.34	<u>Support</u> welcomes the additional sentence emphasising the fact that the NPPF gives strong protection to the green belt.	66581, 66675
		<u>Object</u> Reference to NPPF should be removed. Only relevant in the context of discouraging development.	66312
		<u>Object</u> Second insertion is inaccurate. To treat each village as an island could give more flexibility to land owners and neighbourhood planning groups.	66312
SC-MM139	Paragraph 6.35	<u>Support</u> Inserted words provide helpful clarification.	66676
SC-MM140	Policy NH/9: Redevelopment of Previously Developed Sites and Infilling in the Green Belt	<u>Support</u> Now conforms to the wording of NPPF Para 89	66582
		<u>Object</u> No objection to this policy; however, we recommend inclusion of an additional bullet to ensure adequate consideration is given to the potential for previously developed land to be of high environmental value, in accordance with paragraph 111 of the NPPF.	66888
SC-MM141	Paragraph 6.36	<u>Object</u> Needs to more closely echo NPPF Para 89.	66583
SC-MM144	Policy NH/12: Local	<u>Support</u> Communities need to be aware of what type of recreational uses sites	66297

Main Mod. Ref.	Local Plan policy / paragraph	Summary of issues raised in representations	Representation number(s)
	Green Space	can be used for. Different types of uses should be allowed if the community have a particular need for them, and the site's characteristics and location are appropriate for the proposed use. <u>Support</u> The proposed amended wording is helpful.	66677
SC-MM145	Policy NH/14: Heritage Assets	<u>Object</u> Insufficient to bring the policy into alignment with the NPPF. Para 126 of the NPPF states Local Planning Authorities should set out in their Local Plan "a positive strategy for the conservation and enjoyment of the historic environment". Policy NH/14 and its supporting text fails to meet this requirement. The modified text raises the matter of being in accordance with the NPPF but does nothing to rectify this failing. The Council needs to include a commitment within Policy NH/14 to prepare a Historic Environment Strategy that meets the requirements of the NPPF.	66584
SC-MM147	Paragraph 6.48	<u>Support</u> Historic England welcomes reference to traditional materials and vernacular buildings. Provides greater protection to the historic environment. <u>Object</u> Insistence on traditional materials is a constraint on design freedom contrary to the principle propounded in the NPPF.	66496 66313
SC-MM148	Paragraph 6.49	<u>Object</u> Historic England broadly welcomes. Provides greater protection to the historic environment and reflects NPPF. However, delete 'significant' from second sentence, as per paragraph 20 of Statement of Common Ground with the Council. <u>Object</u> Better aligns with national policy, but it should be included in Policy NH/14 rather supporting text.	66497 66595
SC-MM149	Paragraph 6.51	<u>Support</u> Historic England welcomes reference to the Council's commitment to ensuring future viable uses of heritage assets. Supports the conservation and enhancement of the historic environment.	66498
SC-MM151	Paragraph 6.57	<u>Support</u> Historic England welcomes the recording etc. of heritage assets that are to be lost. Provides greater clarity regarding policy expectations in such circumstances.	66499
SC-MM153	Policy H/1: Allocations for Residential	<u>Support</u> the additional wording in relation to the Sawston Dales Manor Business Park site. Retaining the tree belt and hedges is important.	66678

Main Mod. Ref.	Local Plan policy / paragraph	Summary of issues raised in representations	Representation number(s)
	Development at villages		
<b>CHAPTER 7: DELIVERING HIGH QUALITY HOMES</b>			
SC-MM155	After Paragraph 7.5	<u>Support</u> It is a statement of fact.	66679
		<u>Object</u> The wording of the Green End site allocation is misleading - it can be interpreted that a further 25% of the site can come forward for housing in the future. Parish support retention of remaining industrial land.	66298
SC-MM161	Paragraph 7.28	<u>Support</u> Reference to Lifetime Homes are no longer a requirement of national policy.	66596
SC-MM162	Policy H/9 Affordable Housing	<u>Object</u> The proposed modification is supported. This would be consistent with national planning policy; however, clarification on meeting the national policy tests in respect of obligations (necessary, directly related and fairly and reasonably related) should also be provided.	67029, 67043
		<u>Object</u> where affordable housing provision is required to be calculated on the basis of an increase in the number of units on the site (as opposed to floor area) the policy should be worded to make it clear that the thresholds are to be considered on the basis of a net increase in the number of residential units on any given site.	66814
SC-MM164	Policy H/10: Rural Exception Site Affordable Housing	<u>Object</u> Conflicts with statutory law and national policy, is unevidenced and will be ineffective.	67232
SC-MM165	Policy H/10: Rural Exception Site Affordable Housing	<u>Object</u> Clause 2 of Policy H/10 is too broad. Rural exception sites are for affordable housing only. If "some market housing" has to be considered on viability grounds, then its total proportion must be defined - possibly no more than a maximum of 25%?  The supporting text should also make unambiguous that the 1,000 new homes to be provided by the City Deal (GCP) as Rural Exemption Sites will be 100% affordable.	66585
SC-MM166	Paragraph 7.38	<u>Object</u> Clause 2 of Policy H/10 is too broad. Rural exception sites are for affordable housing only. If "some market housing" has to be considered on	66586



Main Mod. Ref.	Local Plan policy / paragraph	Summary of issues raised in representations	Representation number(s)
		<p>viability grounds, then its total proportion must be defined - possibly no more than a maximum of 25%?</p> <p>The supporting text should also make unambiguous that the 1,000 new homes to be provided by the City Deal (GCP) as Rural Exemption Sites will be 100% affordable.</p>	
SC-MM167	Policy H/11: Residential Space Standards for Market Housing	<u>Object</u> WMS 25 March 2015 -standards should only be required if they address a clearly evidenced need, and where impact on viability has been considered. Insufficient evidence to justify proposed standards.	66597
		<u>Object</u> Based upon policy aspiration. Lack of evidence of need or viability to support policy as required by NPPG. Impact on affordability and choice. Implications for site yield and costs.	66602
		<u>Object</u> The Review on NDSS announced by Government in May 2016 was never undertaken or published. The White Paper of February suggests the government is uneasy about the inflexibility of the standards and will review them. Policy must await further direction from government.	66650
		<u>Object</u> Not evidenced, inflexible and does not take into account site constraint, market conditions and viability issues. Planning policy should not dictate the internal configuration of dwellings. The information should be advisory and better suited to a Design SPD.	66815
SC-MM169	Policy H/19: Provision for Gypsies and Travellers and Travelling Showpeople	<u>Object</u> Increase provision to between 20 and 88 pitches for Gypsies and Travellers who meet the planning definition, and between 61 and 129 for households who do not. Gypsy and Traveller Accommodation Assessment (GTAA) is not robust.	66441, 66917
SC-MM171	Paragraph 7.60	<p><u>Object</u> GTAA is not robust.</p> <p>Council should be required to develop Supplementary Planning Guidance to identify a supply of deliverable sites and broad locations for growth.</p>	66442, 66918
SC-MM172	Table after Paragraph 7.60	<u>Object</u> Update table - identify need for accommodation for at least 149 Gypsy and Traveller households 2016-2031 & indicate need by 5 year periods	66443, 66919

Main Mod. Ref.	Local Plan policy / paragraph	Summary of issues raised in representations	Representation number(s)
SC-MM173	Paragraph 7.64	<u>Object</u> Incorporate the final sentence from proposed paragraph 7.61b into 7.64.	66445, 66920
SC-MM174	Paragraph 7.65a	<u>Object</u> Amendments proposed to Policy H/19 address needs of Gypsies and Travellers who do not meet Annex 1 definition. Consequentially paragraph 7.65a is unnecessary – delete.	66456, 66921
SC-MM176	After Paragraph 7.69	<u>Object</u> Amendments proposed to Policy H/20. Consequentially paragraph 7.69a is not relevant - delete.	66458, 66923
SC-MM177	Policy H/21: Proposals for Gypsies, Travellers and Travelling Showpeople Sites on Unallocated Land Outside Development Frameworks	<u>Object</u> Amend part 1 of Policy H/21 to refer to both Gypsies and Travellers that meet the Annex 1 definition and those that do not.	66451, 66924
SC-MM179	Paragraph 7.70	<u>Object</u> Amendments proposed to Policy H/19 address needs of Gypsies and Travellers who do not meet Annex 1 definition. Consequentially proposed additions to paragraph 7.70 are unnecessary.	66452, 66925
<b>CHAPTER 8: BUILDING A STRONG AND COMPETITIVE ECONOMY</b>			
SC-MM184	Add a new Policy E/1B: Cambridge Biomedical Campus Extension	<u>Support</u> Accept that South Cambridgeshire District Council did decide to put forward this extension site as a proposed modification.	66743
		<u>Object</u> Extension of biomedical provision into green belt - unacceptable impingement (scale and character) into the rural scene. Will adversely affect the nature reserve, one of few public open spaces in Great Shelford parish.	66288
		<u>Object</u> No need for more employment provision in Cambridge. Commuting in and out of the city is a major problem. Need to actively encourage new jobs away from Cambridge.	66274
		<u>Object</u> Site will damage biodiversity, including water voles. Either the Ecological Appraisal missed this, or the colonisation is more recent. Mitigation proposals do not mitigate for water voles, as required by law.	66391
		<u>Object</u> No mention of protecting existing public access around this site. Vital this access is retained and preferably enhanced within any development of the site.	66281
		<u>Object</u> represents a major impingement into the green belt. The likely scale and	66288

Main Mod. Ref.	Local Plan policy / paragraph	Summary of issues raised in representations	Representation number(s)
		character of any development will be an unacceptable impingement into the rural scene. It will adversely affect the nearby nature reserve which is one of the very few public open spaces in the parish.	
		<u>Object</u> Cannot be developed without harm to Green Belt and city edge. Inner Green Belt Review 2015 flawed. Council failed to demonstrate exceptional circumstances for the need for jobs at this location. Negative impact on local landscape and thus purpose of Green Belt. Historic importance of Nine Wells overlooked. Concern about water flow and quality from Nine Wells appropriately addressed.	66535
		<u>Object</u> risk to the Nine Wells Local Nature Reserve and the need for more rigorous screening of co-locating companies to justify need. This will affect views from both White Hill and Magog Down, which will result in harm to the green belt and damage the edge of the city. It is also due to the cumulative impact of several possible but conflicting proposals: Network Rail widening tracks, GCP A1307 and expansion of BioMed Campus that could all result in significant harm to the green belt and the LNR.	66587
		<u>Object</u> while agree the need for jobs can comprise 'exceptional circumstances', the council is required to quantify, explain and justify the nature and scale of need and mechanisms for delivery. Council provided no evidence to justify release from green belt.	66667
		<u>Object</u> Anglian Water is generally supportive of the wording as proposed and has no objection to the principle of development of business and research uses on this site but amend to include reference to both foul and surface water drainage.	66848
		<u>Object</u> Natural England has no objection to this new policy. We welcome requirements for development to have regard to and mitigate any impacts, including through visitor pressure, to the Nine Wells Local Nature Reserve. Requirements for proposals to have regard to the conservation of farmland biodiversity and delivery of net biodiversity gain and public open space are also supported. Bullet points h) and i) are also supported.	66890

Main Mod. Ref.	Local Plan policy / paragraph	Summary of issues raised in representations	Representation number(s)
		<p>Policy should be strengthened to require the creation of an on-site area of high quality informal open space for quiet recreation and enjoyment of the countryside by hospital patients and visitors.</p> <p>Policy should encourage the developer to undertake early engagement with Natural England and other relevant stakeholders.</p>	
SC-MM185	New supporting text to follow new Policy E/1B	<u>Support</u> welcomes the commitment that this site will need to take account of potential improvements to the A1307	66536
		<u>Support</u> relates to important nine wells site	66668
		<u>Support</u> welcome supporting text which recognises need to protect and enhance nine wells.	67009
		<u>Object</u> Land cannot be developed without great harm to Green Belt and city edge. Inner Green Belt Review 2015 is flawed. Council has failed to demonstrate exceptional circumstances for jobs at this location.	66746
		<u>Object</u> while agree the need for jobs can comprise 'exceptional circumstances', the council is required to quantify, explain and justify the nature and scale of need and mechanisms for delivery. Council provided no evidence to justify release from green belt.	66891
SC-MM190	Policy E/6: Duxford Imperial War Museum	<u>Support</u> Historic England & Imperial War Museum welcomes the inclusion of text which highlights the national heritage significance of Duxford as an active historic airfield.	66500, 66486
		<u>Support</u> recognises the importance of the Imperial War Museum,	66680
SC-MM192	Paragraph 8.23	<u>Object</u> Welcome inclusion of text but further amend third sentence to refer to 'nationally important heritage asset'.	66487
		<u>Support</u> Historic England welcomes. Provides helpful description of the importance and significance of Duxford.	66501
		<u>Support</u> gives a good description of the importance of the Imperial war Museum	66683
SC-MM193	Paragraph 8.37	<u>Support</u> It is important to support pro-active parish councils in providing for local needs.	66723

<b>Main Mod. Ref.</b>	<b>Local Plan policy / paragraph</b>	<b>Summary of issues raised in representations</b>	<b>Representation number(s)</b>
SC-MM194	Policy E/9: Promotion of Clusters	<u>Object</u> No comments raised during preparation of Plan. Not needed to make it sound or legally compliant. Undermines the basis of the policy, rendering it ineffective. Modification is unjustified and unnecessary.	66558
SC-MM197	Policy E/19: Tourist Facilities and Visitor Attractions	<u>Object</u> The increased traffic arising from such developments, often on minor country roads, is a generic issue that should be raised in the policy itself.	66588
<b>CHAPTER 9: PROMOTING SUCCESSFUL COMMUNITIES</b>			
SC-MM201	Policy SC/1: Allocation for Open Space	<u>Site 1a Land east of recreation ground, Over</u>	66655
		<u>Support</u> main modification SC-MM292c -deletion of open space allocation SC/1 (1a)	
		<u>Site 1a Land east of recreation ground, Over</u>  <u>Object</u> to deletion of site. Over Parish Council offered to purchase it but owners wouldn't sell. Open Space deficits and village growing. Vital to village's development. Allocation must be retained.	66357
		<u>Site 1e Grange Field, Great Shelford</u>  <u>Object</u> to removal of Grange Field. Great Shelford is a large village with a serious deficit in recreation space. Removal will seriously damage the chances of it becoming recreation space.  The change seems to be purely because of doubts about delivery. Great Shelford Parish Council is determined to acquire GF within a 3-5 year timeframe: Extensive negotiations with Owners. Commitment from GSPC to pursue CPO if necessary.	66287, 66684
SC-MM205	Policy SC/3: Protection of Village Services and Facilities	<u>Support</u> Reflects para. 70 of the NPPF regarding the safeguarding and promotion of cultural buildings	66275
SC-MM207	Policy SC/4: Meeting	<u>Support</u> Reflects para. 70 of the NPPF regarding the safeguarding and	66277

Main Mod. Ref.	Local Plan policy / paragraph	Summary of issues raised in representations	Representation number(s)
	Community Needs	promotion of cultural buildings	
SC-MM208	After Paragraph 9.10	<u>Object</u> Wording inconsistent with guidance. Encourage smaller builders on smaller sites without the bureaucracy and cost of volume building. Wording circumvents this without specifying what charges could be made, at what level of cost or in what circumstances.	66314
		<u>Object</u> All new dwellings place an additional burden on the local infrastructure so excluding schemes of up to 10 dwellings (or a combined gross floor space of less than 1,000sqm) from S106 payments for off-site improvements is, we believe, unacceptable.	66589
		<u>Object</u> Should confirm any planning obligations should meet the statutory tests	67042, 67030
SC-MM216	Paragraph 9.19	<u>Support</u> Welcome the possibility that such facilities might be located outside frameworks or in Green Belt.	66461
SC-MM217	Policy SC/7: Outdoor Play Space, Informal Open Space and New Developments	<u>Support</u> Welcome increased importance given to standards. Note that Sport England recognises the higher value presented by all-weather floodlit facilities in calculating net required area per 1,000.	66462
		<u>Support</u> Natural England is generally supportive of the additional requirements relating to open space provision.	66892
SC-MM221	Policy SC/10: Lighting Proposals	<u>Support</u> Natural England is supportive of the additional criteria which will help minimise the effects of lighting on sensitive species such as bats.	66893
SC-MM226	Paragraph 9.57	<u>Support</u> Environmental impacts have both national and local consequences and the proposed text makes this connection.	66686
<b>CHAPTER 10: PROMOTING AND DELIVERING SUSTAINABLE TRANSPORT AND INFRASTRUCTURE</b>			
SC-M228:	After Paragraph 10.4	<u>Support</u> for improved cycle networks.	66700, 66688
SC-M229:	Policy TI/2: Planning for Sustainable Travel	<u>Support</u> for recognising need for horse riding routes.	66689
SC-MM230	Paragraph 10.18	<u>Support</u> Recognise the importance of travel plans but regret most plans for rural villages are rendered ineffective by the lack of adequate and effective public transport services.	66464
SC-M231	Policy TI/3: Parking Provision	<u>Support</u> Wording is better and clearer	66701

Main Mod. Ref.	Local Plan policy / paragraph	Summary of issues raised in representations	Representation number(s)
SC-MM233	Paragraph 10.29	<u>Object</u> Add text to the end of the sentence 'and internationally renowned air shows'.	66488
		<u>Support</u> Recognises flying an important part of IWM activities	66690
SC-MM234	After Paragraph 10.33	<u>Support</u> These additions are helpful and important.	66704
		<u>Object</u> Welcome added text and map for Imperial War Museum Duxford. Para 10.33c - delete 'the' preceding IWM, and add to the end of last sentence 'and assessed against the criteria in 10.33b'.	66489
<b>APPENDICES</b>			
SC-MM238	SC-MM238: After Appendix A: Supporting Studies and Evidence Base	<u>Object</u> The use of the Liverpool method to calculate a housing land supply shortfall is not sound. The Sedgefield method should be used.  'Liverpool' method is not the preferred approach identified in national guidance and is inconsistent with the aim to boost significantly the supply of housing  The 'Sedgefield' method has been preferred at planning appeals in South Cambridgeshire, and is applied by neighbouring authorities  The 'Liverpool' method is unnecessary if assumptions about housing delivery at the existing and proposed new settlements are correct.	66910, 66935
		<u>Object</u> to the unjustified adoption (without evidence or clarification) of the Liverpool methodology now proposed by both Councils.  A new housing trajectory should be provided, to allow comment on changes to delivery rates.	66966
		<u>Object</u> Figure A6 includes South Cambridgeshire new settlements as a contribution to 5YHLS, with further significant housing delivery later in the plan period. It is unreasonable for the Council to express strong confidence in the delivery of new settlements whilst promoting the Liverpool Method at the same time.	67039, 67040
SC-MM240	After Appendix B: Local	<u>Sites NH/12-035d - Land around the west and north west Cambourne and</u>	66333

Main Mod. Ref.	Local Plan policy / paragraph	Summary of issues raised in representations	Representation number(s)
	Plan - Superseded Documents and Policies	<p><u>NH/12-036 - Honeysuckle Close and Hazel Lane, Cambourne</u></p> <p><u>Object</u> to the removal of Local Green Space with no other protection. Want assurance it will not be built on in the future.</p>	
		<p><u>NH/12-076b Log Field, Gamlingay &amp; NH/12-076c - Lupin Field, Gamlingay</u></p> <p><u>Object</u> to deletion of 'The Horse Paddocks' and 'Lupin Field', Gamlingay. The adjoining site 'Log Field' (NH/12-076a) is designated as a Local Green Space. They should be treated the same.</p>	66562
		<p><u>Site NH/12-091 - Driver's Meadow, Ickleton</u></p> <p><u>Object</u> to removal of LGS. Meets para 77 &amp; 78 of NPPF. Close to heart of the community and conservation area. Demonstrably special. Iconic and beautiful views. Area of tranquillity. Could be of historic interest. Local in character and is not an extensive tract of land.</p>	66527
SC-MM244	SC-MM244: Appendix C: Glossary	<p><u>High Quality Public Transport</u></p> <p><u>Support</u> important that the document sets out a clear view of what High Quality Public Transport</p>	66706
SC-MM245	SC-MM245: Appendix C: Glossary	<p><u>'Local Needs'</u></p> <p><u>Support</u> Reference should be made to supporting findings from surveys relating to Local Housing Needs assessments undertaken as evidence for Neighbourhood Plans.</p>	66301
		<p><u>'Local Needs'</u></p> <p><u>Object</u> Definition is imprecise and ill-conceived. Three different definitions for the same pair of words. Define housing need precisely and narrowly, based on the NPPF definition.</p>	66315
<b>POLICIES MAP</b>			



Main Mod. Ref.	Local Plan policy / paragraph	Summary of issues raised in representations	Representation number(s)
SC-MM261	Waterbeach New Town	<p><u>SC-MM261a</u></p> <p><u>Support</u> Historic England welcomes Major Development Site boundary changes. Provides greater protection to historic environment and Denny Abbey and Soldiers Hill.</p>	66502
		<p><u>Support</u> Welcome the modification of the northern extent of the Major Development Site boundary. Reflects careful and detailed assessment of the relationship between the development and the designated heritage assets at Denny Abbey, and allows opportunities to deliver enhancements to its setting through positive measures associated with delivery of the new settlement. Positive discussions have been undertaken and an agreed position was reached between RLW Estates, SCDC and Historic England in this regard.</p>	66980
		<p><u>Support</u> Despite continuing concern with the merit of the boundary modification no objection is raised, in the interest of expediency.</p>	66859
SC-MM262	Bourn Airfield New Village	<p><u>Object</u> There have been concerns about the capacity of the site since 1992 - Inspector drew attention to the "generally small and cramped nature of the site" and it "lack sufficient room within its boundaries to give adequate separation (from Highfields Caldecote)". He thought 3,000 dwellings would produce a tight development in this rural area. Lack of capacity is why the site size is being amended.</p> <p>Will be only 50m from Highfields Caldecote, which would lose its sense of separation and identity and its rural character.</p> <p>Will create ribbon of development and result in over intensification of settlements south of A428. Already extensive development in the area.</p> <p>Transport infrastructure is needed to make this scale of development work.</p>	67149, 67107, 67093, 67092, 67085, 67082, 67080, 67076, 67075, 67063, 67059, 67057, 67013, 66960, 66950, 66913, 66911, 66904, 66875, 66868, 66829, 66734, 66682, 66652, 66647, 66644, 66643, 66634, 66633, 66625,

Main Mod. Ref.	Local Plan policy / paragraph	Summary of issues raised in representations	Representation number(s)
			66622, 66606, 66603, 66598, 66569, 66555, 66551, 66548, 66544, 66543, 66537, 66532, 66528, 66525, 66518, 66513, 66508, 66505, 66483, 66477, 66474, 66472, 66471, 66469, 66466, 66437, 66430, 66423, 66420, 66416, 66410, 66408, 66400, 66399, 66394, 66387, 66380, 66377, 66374, 66369, 66366, 66359, 66348, 66343, 66339, 66336, 66330, 66325, 66323, 66320, 66319, 66318, 66302
		<u>Object</u> The former ThyssenKrupp site will be redeveloped for employment purposes and should therefore continue to be annotated as such on the Inset Map.	67127, 66958, 66552, 66542, 66524, 66512

Main Mod. Ref.	Local Plan policy / paragraph	Summary of issues raised in representations	Representation number(s)
		<u>Object</u> Will create ribbon of development. ThyssenKrupp building should remain as an employment site	67053, 66831, 66290
		<u>Object</u> Development area of the site would need to be further increased in order to accommodate the proposed level of housing. The facilities and services required to make the proposal sustainable require a critical mass of development in order to be viable, and to support a viable secondary school. SA process remains flawed, and the strategic option for development north of Cambourne should therefore be considered.	67171
		<u>Object</u> The two existing employment sites are not owned by the promoters. There is overwhelming evidence to justify a wider MDS boundary in this area than in the proposed modification to provide flexibility for masterplanning, urban design, place making and transport infrastructure.	66568
SC-MM266	Bassingbourn Village Map	<u>Support</u> We need more houses for people in Bassingbourn. This green space is not special.	66413
		<u>SC-MM266d - The Rouses (NH/12-016)</u>	
		<u>Object</u> Should remain as Local Green Space. Demonstrably special and consistent with para 77 of NPPF. It is a well used open space, has lots of wildlife, flora, fauna and connects the recreation ground and wood. Significant loss of natural recreational land of great value to the community, for dog walking, walking and contemplation. Safe route to walk to school and for children to play. Historical significance. Close to community, centre of village. Used and valued by villagers and visitors.	67231, 67230, 67229, 67228, 67227, 67226, 67225, 67224, 67223, 67222, 67221, 67220, 67219, 67218, 67217, 67216, 67215, 67214, 67213, 67212, 67211, 67210, 67209, 67208, 67207, 67205, 67204, 67202, 67201, 67200, 67199, 67198,

Main Mod. Ref.	Local Plan policy / paragraph	Summary of issues raised in representations	Representation number(s)
			67197, 67196, 67193, 67192, 67191, 67190, 67189, 67188, 67187, 67186, 67185, 67184, 67183, 67182, 67181, 67180, 67179, 67178, 67177, 67176, 67170, 67169, 67168, 67167, 67166, 67165, 67164, 67163, 67162, 67161, 67160, 67159, 67158, 67157, 67156, 67155, 67154, 67153, 67152, 67151, 67150, 67148, 67146, 67145, 67144, 67143, 67142, 67138, 67132, 67131, 67130, 67129, 67128, 67126, 67124, 67121, 67115, 67110, 67108, 67105,

Main Mod. Ref.	Local Plan policy / paragraph	Summary of issues raised in representations	Representation number(s)
			67104, 67102, 67101, 67099, 67097, 67096, 67071, 67070, 67069, 67062, 67055, 67049, 67044, 67038, 67037, 67036, 67035, 67034, 67033, 67031, 67027, 67025, 67024, 67023, 67020, 67019, 67018, 67016, 67012, 67011, 67010, 67006, 67005, 67004, 67003, 67001, 67000, 66999, 66998, 66997, 66996, 66995, 66994, 66993, 66992, 66991, 66990, 66988, 66987, 66986, 66985, 66984, 66983, 66982, 66981, 66979, 66978, 66976, 66974, 66973,

Main Mod. Ref.	Local Plan policy / paragraph	Summary of issues raised in representations	Representation number(s)
			66971, 66967, 66964, 66963, 66962, 66959, 66957, 66949, 66948, 66947, 66946, 66944, 66943, 66941, 66940, 66939, 66938, 66937, 66936, 66932, 66928, 66927, 66926, 66902, 66901, 66900, 66899, 66894, 66889, 66882, 66873, 66866, 66863, 66862, 66861, 66857, 66853, 66851, 66850, 66849, 66842, 66837, 66836, 66835, 66834, 66833, 66830, 66828, 66826, 66825, 66822, 66820, 66818, 66817, 66816, 66813, 66811, 66810, 66809, 66808,

Main Mod. Ref.	Local Plan policy / paragraph	Summary of issues raised in representations	Representation number(s)
			66807, 66806, 66805, 66804, 66803, 66802, 66801, 66800, 66799, 66798, 66797, 66796, 66795, 66794, 66793, 66792, 66791, 66790, 66789, 66788, 66787, 66786, 66785, 66784, 66783, 66782, 66781, 66780, 66779, 66778, 66777, 66776, 66775, 66774, 66773, 66772, 66771, 66770, 66769, 66768, 66767, 66765, 66764, 66763, 66762, 66761, 66759, 66758, 66757, 66756, 66755, 66754, 66753, 66751, 66750, 66749, 66747, 66745, 66744, 66742,

Main Mod. Ref.	Local Plan policy / paragraph	Summary of issues raised in representations	Representation number(s)
			66740, 66737, 66736, 66733, 66732, 66730, 66729, 66728, 66727, 66726, 66725, 66724, 66722, 66720, 66719, 66718, 66716, 66715, 66714, 66713, 66711, 66710, 66708, 66707, 66705, 66703, 66702, 66699, 66696, 66695, 66694, 66691, 66687, 66670, 66669, 66665, 66664, 66663, 66662, 66661, 66660, 66659, 66657, 66651, 66629, 66621, 66619, 66617, 66616, 66615, 66614, 66613, 66612, 66611, 66610, 66570, 66561, 66560, 66557, 66530,



Main Mod. Ref.	Local Plan policy / paragraph	Summary of issues raised in representations	Representation number(s)
			66428, 66427, 66426, 66418, 66414, 66390, 66373, 66372, 66365, 66364, 66350, 66342, 66334
		<u>Object</u> Deleting Local Green Space sites, particularly SC-MM266d, will result in significant loss of natural recreational land of great value to the community, for walking and contemplation, which cannot be replaced.	66427
SC-MM267	Bourn Village Map	<u>Object</u> Proposed change of status of the meadow next to the Brook may open the way to building on a potential flood plain, and the destruction or degradation of an ancient meadow.	66283
SC-MM268	Cambourne Village Map	<u>Object</u> strongly to loss of Local Green Space from the green areas in Cambourne, particularly the country park that is proposed to be undesignated. This area should be kept green and not built on.	66358, 66356, 66355
		<u>SC-MM268g - Sirius Lake (NH/12-035a) &amp; SC-MM268h - Whomping Willow Lake (NH/12-035b)</u>	66354, 66335
		<u>Object</u> Green Space status should remain or be changed into another form of protected space to ensure it cannot be built upon. The areas are well used by the community and have a wide biodiversity of species and rich in flora and fauna.	
		<u>SC-MM268g - Sirius Lake (NH/12-035a)</u>	66362
		<u>Object</u> Satisfies requirements of NPPF Paragraph 77 - community use it all day, every day. This space must remain as Local Green Space.	
SC-MM270	Cottenham Village Map	<u>SC-MM270k Les King Wood (NH/12-052)</u>	66460
		<u>Object</u> Disappointed Les King Wood has been relegated given its role	

Main Mod. Ref.	Local Plan policy / paragraph	Summary of issues raised in representations	Representation number(s)
		connecting the Recreation Ground to new development.  Support for NH/12-049a. Proposed adjustment to development framework in emerging Neighbourhood Plan.	
SC-MM272	Elsworth Village Map	<u>SC-MM272d - Field between Brockley Road and Brook Street (NH/12-062)</u>  <u>Object</u> Removal of LGS belies the importance attached to this area. Should be PVAA. Intrinsically linked to protected frontage. Provides unrestricted views of listed buildings & church. Biodiversity value. Undeveloped and tranquil, important for maintaining rural character.	66564
		<u>T SC-MM272e - Land at south end of Brook Street (NH/12-063)</u>  <u>Object</u> Should be PVAA like MM272a and MM272b. Provides link between protected areas of land to the south of the village and is at least as deserving of PVAA status as areas MM272a and MM272b which were awarded this PVAA status for reasons previously stated in the original submission.	66565
SC-M2723	Eltisley Village Map	<u>SC-MM273a Allotments for Labouring Poor (NH/12-066)</u> <u>SC-MM273b Pocket Park (NH/12-067)</u>  <u>Object:</u> The allotments for the Labouring Poor and the Pocket Park are both important facilities for the villagers of Eltisley and should be protected as such.	66839, 66840
SC-MM275	Fulbourn Village Map	<u>SC-MM275b - Field between Cox's Drove, Cow Lane and Land adjacent the Horse Pond (Land outside the village framework) (NH/12-074)</u>  <u>Support</u> Removal of the Local Green Space designation is fully supported, given Inspector comments and planning approval of 110 dwellings on the site in October 2017.	66389
SC-MM276	Gamlingay Village Map	<u>SC-MM276b - The Lupin Field (NH/12-076c)</u>  <u>Object</u> Concern that Lupin Field was rejected - beauty and tranquillity argument	66300

Main Mod. Ref.	Local Plan policy / paragraph	Summary of issues raised in representations	Representation number(s)
		presented at Inquiry not referred to by Inspectors report after the inquiry hearing. <u>SC-MM276a - The Horse Paddocks (NH/12-076b) &amp; SC-MM276b - The Lupin Field (NH/12-076c)</u>  <u>Object</u> to deletion of 'The Horse Paddocks' and 'Lupin Field', Gamlingay. The adjoining site 'Log Field' (NH/12-076a) is designated as a Local Green Space. They should be treated the same.	66563
SC-MM277	Great and Little Abington Village Map	<u>SC-MM277a - Middle of Magna Close (NH/12-077) &amp; SC-MM277b - Meadows, Bancroft Farm (NH/12-104) (boundary as amended in March 2014)</u>  <u>Support</u> Would have preferred these sites to remain as Local Green Space but can understand why their status has changed to Protect Village Amenity Area, which will still afford them protection.	66709
		<u>SC-MM277c</u>  <u>Support</u> Agree with amended text to include the Pampisford Road and Linton Road housing developments in the revised village framework.	66709
SC-MM284	Ickleton Village Map	<u>Driver's Meadow (NH/12-091)</u>  <u>Support</u> Would have preferred the site to remain as Local Green Space but can understand why their status has changed to Important Countryside Frontage, which will still afford it protection.	66712
		<u>Driver's Meadow (NH/12-091)</u>  <u>Object</u> to removal of LGS. Meets para 77 & 78 of NPPF. Close to heart of the community and conservation area. Demonstrably special. Iconic and beautiful views. Area of tranquillity. Could be of historic interest. Local in character and is not an extensive tract of land.	66523
SC-MM291	Orwell Village Map	<u>SC-MM291c - Glebe Field, behind St Andrews Church (NH/12-128)</u>	66567

Main Mod. Ref.	Local Plan policy / paragraph	Summary of issues raised in representations	Representation number(s)
		<u>Object</u> to removal of LGS. Backdrop to church. Public footpath, used by dog walkers, & enjoy spectacular views. Land needed for burial ground. Vital for managing SSSI and rare breed sheep.	
SC-MM292	Over Village Map	<u>SC-MM292a – Station Road / Turn Lane (NH/12-130) &amp; SC-MM292b - Land to rear of The Lane (NH/12-131)</u>  <u>Support</u> removal of Local Green Space and PVAA designations. Neither site warrant designation.	66353, 66352, 66351, 66347, 66346
SC-MM293	Pampisford Village Map	<u>Support</u> Should be included in Pampisford. Corrects anomaly. Strengthens objective for village frameworks and reinforces principle of plan led system.	66855
SC-MM295	Sawston Village Map	<u>Support</u> Pleased to see a number of important areas in Sawston are given Local Green Space status.	66717
		<u>SC-MM295b - Butlers Green (NH/12-144) &amp; SC-MM295e - The Spike Playing Field, South Terrace (NH/12-141)</u>  <u>Support</u> Would have preferred the sites to remain as Local Green Space but can understand why their status has changed.	66717
		<u>SC-MM295f - Sawston - Millennium Copse (NH/12-143)</u>  <u>Support</u> Agree with the amendment to the Millenium Copse area boundary to exclude the land that is within the nursery.	66717
SC-MM296	Steeple Morden Village Map	<u>SC-MM296a - Ransom Strip, Craft Way (NH/12-149)</u>  <u>Object</u> to the deletion as LGS. Important woodland and meadow to local community. Should be designated to prevent new development. Tranquil, rich in wildlife, in close proximity to community.	66504

## C2. Sustainability Appraisal of Main Modifications - Summary of Representations related to the South Cambridgeshire Local Plan

Section	Paragraph	Summary of issues raised in representations	Representation number(s)
Non Tech Sum		<p><u>Object</u> Analysis is biased because it assesses the sustainability impact of the proposed new village at Bourn Airfield in terms of improved bus journeys to Cambridge city centre and cycling, which it considers broadly positive. In fact the vast majority of commuters from Bourn will have to travel by car (employment is scattered across the area, rather than all being located in the city centre), which will have adverse impacts on the quality of life in surrounding villages and on the environment through carbon emissions.</p> <p>The proposed development is unsustainable in terms of transport and should be scored amber/red or red.</p>	67098
Chapter 1		<p><u>Support</u> Natural England is satisfied that the Sustainability Appraisal of Main Modification (December 2017) generally accords with the requirements of the Planning and Compulsory Purchase Act 2004 and the Strategic Environmental Assessment (SEA) Regulations. We agree that the modifications generally contribute positive effects in terms of all of the relevant sustainability objectives, including biodiversity. We have no further detailed comments to make.</p>	66898
Chapters 2, 3, 4, Appendix A1		<p><u>Object</u> The sustainability appraisal update does not take account of any of the evidence submitted and discussed at the Examination, nor the recent 'Cambourne to Cambridge: better bus services', which provided sustainability appraisals of locations capable of delivering a Park and Ride site in the A428 corridor west of Cambridge.</p>	67175, 67174, 67173, 67172
Chapter 4		<p><u>Object</u> The Sustainability Appraisal, Document 4 on the Cumulative Effects Assessment reviews the earlier CEA and notes that the increase of 1150 houses planned for Cambourne West will have significant negative effects, including on car trips generated.</p> <p>However, rather surprisingly, Document 4 does not address modification SCMM-091 in Policy SS/6 that proposed to bring forward development of Bourn Airfield, with 3,500 houses, earlier in the Plan period.</p>	67100
Appendix A.1		<p><u>Object</u> The sustainability appraisal process did not consider reasonable alternatives to the joint housing trajectory, which is a breach of the SEA Regs.</p>	66929, 66922

		Liverpool method not simple procedural matter and will have negative implications for the supply and delivery of housing and the housing-related sustainability objectives. The assessment process did not properly assess the effect of these modifications, and in the case of the proposed joint housing trajectory no alternative policy options were identified or assessed.  Alternatives to a joint trajectory were available but not assessed.	
Appendix A.1		<u>Object</u> Misconceives purpose and impact of such exemptions, and fails to address conflict with statutory limitation on proper use of planning obligations	67233

### C3. South Cambridgeshire Additional Modifications (not part of consultation but provided for information and completeness)

Additional Mod. Ref.	Local Plan policy / paragraph	Summary of issues raised in representations	Representation number(s)
<b>CHAPTER 6: Protecting and Enhancing the Natural and Historic Environment</b>			
SC-AM024	Key Facts	<u>Support</u> additional text to reference Sites of Special Scientific Interest (SSSIs) and County Wildlife Sites and the Cambridgeshire Green Infrastructure Strategy.	66896
SC-AM025	Paragraph 6.23	<u>Support</u> the amendments to reference individual internationally designated sites.	66897